

NORTHPOWER

Compliance Plan 2023

Non-compliance	Description		
Audit Ref: 2.1 With:11.2(2) From: 29-Apr-22 To: 30-Apr-23	Relatively low number of information inaccuracies identified during the audit. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong. During the audit evidence demonstrated the significant efforts to achieve accuracy with exception reporting in place and correction of errors discovered. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer to the response in each of the individual non-compliance sections			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer to the response in each of the individual non-compliance sections			

Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 29-Apr-22 To: 30-Apr-23	12 x ICPs did not have READY status in the Registry prior to electricity being traded at the ICPs Potential impact: Low Actual impact: Low Audit history: once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate. During the audit evidence was produced showing effort to achieve accuracy with exception reporting in place and correction of errors discovered. No impact on settlement outcomes. Audit risk rating low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The use of emails to request retailer acceptance of new ICPs has been identified as a weak point in the New Connections process. We are investigating processes that may remove the requirement for a retailer to email their reply to the “new ICP notification” email back to Northpower but will need to discuss the proposal with retailers.</p> <p>A daily report has been implemented, which will remain after any other process changes, to highlight any ICPs which have not moved to the READY status due to the retailer acceptance not being received. Staff will follow up with the proposed retailer to get their response to the request for acceptance of the new ICP</p>		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Northpower will send a works authority/approval to connect to the livening contractor only after Northpower receives the Retailer acceptance and request to liven.</p> <p>We are also investigating a digital solution for retailers to provide their acceptance and request to liven, rather than current email-based process.</p>	31 October 2023	

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 29-Apr-22 To: 30-Apr-23	16 x ICP (1.7% of all new connections) had the IECD uploaded to the Registry more than 10 days after the event date. 1 x discrepancy between IECD and Metering/Active event dates. Potential impact: Low Actual impact: Low Audit history: once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as Strong. During the audit evidence demonstrated considerable endeavours to achieve accuracy, with exception reporting in place and correction of errors discovered. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue	Completion date	Remedial action status	
Where we become aware, the livening agent is contacted to request that the missing information be provided. Where the required information has not been provided within the timeframes in the Code the livening agent is reminded of their obligations and informed that their actions have resulted in a breach for Northpower.	As soon as breach identified	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
Ongoing education of Livening agents as part of normal communication processes.	Ongoing		

Non-compliance	Description		
<p>Audit Ref: 3.14 With: Clause 15 Schedule 11.1</p> <p>From: 29-Apr-22 To: 30-Apr-23</p>	<p>8 x ICPs did not have READY validated after 24 months.</p> <p>Potential impact: Low Actual impact: Low Audit history: none previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate. During the audit evidence demonstrated efforts made to validate the READY status although this appears inconsistent. No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have emailed the retailer noted in the Registry as the “proposed retailer” for all affected ICPs and requested that they respond as to whether the ICP should be kept or be decommissioned.</p> <p>To date we have had a response from only two of the five affected retailers so the other retailers will be followed up a month after the initial email.</p>		2/6/2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A report has been created that is run each day to capture the ICPs that have remained at either the New, Ready or Inactive New Connection In Progress status for 22 month or more. The retailer is then emailed to request whether the ICP should be kept or be decommissioned.</p> <p>To date two additional ICPs have appeared on the new report and the affected retailers have been emailed.</p>		On-going	

Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 29-Apr-22 To: 30-Apr-23	Relatively low number of Registry updates greater than 3 days from the event date Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate. During the audit clear evidence was demonstrated of efforts made to meet code requirements using available Registry reports and exception reporting. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted in the Audit commentary, the majority of late Registry updates (in the Audit Compliance Report) are due to either generation being installed at an existing ICP (for which there is no easy solution under current Code settings) or price category changes that have been agreed with the retailer and therefore are not non-compliant.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing education of Network Approved Contractors and Solar installers as part of normal communication processes.		On-going	