

# Compliance plan for Waipa Network Distributor Audit 2023

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 01-Jun-22 To: 15-May-23	Registry information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate and will move to strong once the dashboard reporting includes dates. The risk rating is assessed to be low as the number of ICPS affected is small in relation to the number of ICPS overall.		
Actions taken to resolve the issue		Completion date	Remedial action status
The team will run AC020 report weekly until reporting update is made in ARC		Current-already actioned	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
ARC Dashboard reporting update will provide visibility of data inaccuracies		31/08 /23	

Requirement to correct errors			
Non-compliance	Description		
Audit Ref: 2.2 With: Clauses 11.2(2) and 10.6(2) From: 01-Jun-22 To: 15-May-23	Errors not corrected as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate and will move to strong once the dashboard reporting includes dates. The risk rating is assessed to be low as the number of ICPS affected is small in relation to the number of ICPS overall.		
Actions taken to resolve the issue		Completion date	Remedial action status
The team will run AC020 report weekly until reporting update is made in ARC		Current-already actioned	
Preventative actions taken to ensure no further issues will occur		Completion date	
ARC Dashboard reporting update will provide visibility of data inaccuracies		31/08/23	

Timeliness of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clauses 7(2) of Schedule 11.1 From: 25-Oct-22 To: 01-May-23	Two ICPs not updated to “ready” prior to electricity being traded. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as ARC has robust controls to mitigate risk to an acceptable level. The risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
ARC ICP Management system was newly implemented at time of audit sample submission. Staff have received further training on its use to ensure they understand the process in the new system.	Current-already actioned	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ARC ICP Management system recently implemented will identify system-related issues and report these in dashboard reporting	Current-already actioned	

Timeliness of initial electrical connection date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of schedule 11.1 From: 01-Jun-22 To: 15-May-23	80 initial electrical connection dates not updated within ten business days. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate and will move to strong once the dashboard reporting includes dates. The risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have provided further training to staff in the new ICP Management system to ensure the use of 'event date' is understood by the team.	Current-already actioned	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ARC ICP Management system recently implemented will identify system-related issues and report these in dashboard reporting. Prioritising on dates is under development in ARC.	Current-already actioned	

Monitoring of "new" & "ready" statuses		
Non-compliance	Description	
Audit Ref: 3.14 With: Clauses 15 of Schedule 11.1  From: 01-Jun-22 To: 15-May-23	Four of the five ICPs at "new" or "ready" for more than 24 months not confirmed as required. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as the quick reports do not contain dates to be able to identify those ICPs needing to be confirmed. The risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
The Audit Compliance report AC020 will be used as an interim tool to identify ICP creation statuses until ARC dashboard reporting is updated.	Current-already actioned	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Updates to the dashboard reporting to include ICP creation date, and date prioritisation are in development and will immediately allow us identify anomalies in with ICP compliance dates.	31/08/23	

Timeliness of registry updates		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Jun-22</p> <p>To: 15-May-23</p>	<p>12 late address updates.</p> <p>One late price update of the sample of ten ICPs.</p> <p>96 late decommissioning status updates.</p> <p>87 late distributed generation updates.</p> <p>One late NSP change.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong as the controls in ARC will mitigate risk to an acceptable level.</p> <p>The risk rating is low as the volume of ICPs affected are small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Team have been reminded of the timeliness of registry updates and trained to ensure data input into ARC is accurate. ARC will resolve this issue going forward, as it flags these on our dashboard.	Current – already actioned	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ARC ICP management system provides additional checks and reporting to help minimise any late notifications within our control	Current – already actioned	

Notice of NSP for each ICP			
Non-compliance	Description		
Audit Ref: 4.2 With: Clause 7(1),(4) & (5) Schedule 11.1 From: 29-Jun-22 To: 19-Jun-23	One ICP mapped to wrong NSP and balancing area. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as development is still required to manage NSP changes effectively. The risk rating is assessed to be low as Waipa operate two distinct network areas and the ICP affected was due to human error and has been corrected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Report AC020 will be used to monitor NSP changes and discrepancies. ICP in question has been corrected.		Current – already actioned	
Preventative actions taken to ensure no further issues will occur		Completion date	
[Digital Stock to implement one of two possible solutions based on data available from GIS. Each solution will require manual approval before events are sent.]		31/08/23	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1  From: 01-Jun-22 To: 15-May-23	Approximately 620 ICPs with addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong going forward as the controls in ARC will mitigate risk to an acceptable level.  The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
We have done desk-based work to identify addresses and duplicates, however many of the ICPs identified require site visits which we intend to work through as resourcing allows. We will also work to identify ICPs where address information has been recorded correctly but in a different field of the record to improve accuracy of location.		Current – already actioned
Preventative actions taken to ensure no further issues will occur		Completion date
[ARC ICP Management won't allow duplicate addresses and makes all the required registry address fields compulsory so incomplete addresses will be minimised. ]		Current – already actioned
Identified		

Distributor to provide ICP information		
Non-compliance	Description	
<p>Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Jun-22 To: 15-May-23</p>	<p>Chargeable capacity incorrectly recorded on the registry when it is being derived from the retailer billing files.</p> <p>Two ICPs with the incorrect distributed generation details recorded of the sample of 28 ICPs checked.</p> <p>Four ICPs with an incorrect initial electrical connection date populated.</p> <p>One ICP with a "known" unmetered load not recorded on the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong with ARC in place as controls will mitigate risk to an acceptable level.</p> <p>The risk rating is assessed to be low as data accuracy overall is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Capacities have been amended and event stacking has been reversed. ICP 0001132003WA6F3 is still undergoing investigation to see if generation is recorded on the correct ICP.	31/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monitoring the High-Risk database as well as checking the report EIEP1 & 3 to pick up any discrepancies. ARC has a separate field for separate storage of Chargeable Capacity values, which will not be sent up to the registry.	Ongoing and actioned.	