

Compliance Plan Vector Distributor 2023

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) & 10.6(1) From: 01-Oct-22 To: 11-Jul-23	Examples of incorrect or missing information found in sections 3.3, 4.2, 4.4 and 4.6. 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 rated as moderate as whilst there are good processes in place for identifying inaccurate and missing information, corrections are not always made in a timely manner. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Distributed Generation: Continue monthly follow up with customers for missing COCs and issue deadline to customer for response. IECD: Allocate resource to manage and monitor follow up for missing IECD from warranted person monthly. We will continue to use the audit compliance report to pick up missing data.		30/11/2023	Identified
		30/11/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
N/A			

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: 11.2(2) and 10.6(2) From: 01-Oct-22 To: 11-Jul-23	Errors were not always 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	
Low	The controls are rated as moderate as whilst there are good processes in place for identifying inaccurate and missing information, corrections are not always made in a timely manner. The audit risk rating is low as the incorrect information has a small or no effect on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Refer to audit reference 2.1 A daily process of checking registry errors (NOTfiles) will be in place to identify updates that failed to flow up from Gentrack to registry. We will continue to use the audit compliance report to pick up missing data.	30/11/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/A		

Provision of ICP Information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7 From: 01-Oct-22 To: 11-Jul-23	360 ICPs became “active” but had no initial electrical connection date populated. 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	Controls are rated as moderate as there is room for improvement in the monitoring of missing dates. The audit risk rating is low as the missing dates have little or no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
IECD: Refer to notes on audit ref 2.1		30/11/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer to notes on audit ref 2.2		30/11/2023	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 13-Oct-22 To: 18-May-23	Nine ICPs were made “ready” after electrical connection, and therefore trading, had occurred. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as they will eliminate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
N/A		
Preventative actions taken to ensure no further issues will occur		Completion date
The current process implemented is an ongoing piece of work. Further training will be provided to staff to ensure these scenarios are avoided and better monitored.		30/11/2023
		Identified

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Oct-22 To: 18-May-23	3,273 ICPs did not have initial electrical connection dates populated within ten business days of being electrically connected. Potential impact: None Actual impact: None Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are moderate as Vector is reliant on the timely return of connection information from the warranted person and whilst reporting is in place to identify missed information, it does not always ensure timeliness. The audit risk rating is low because there is no direct impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Refer to audit reference 2.1 and 2.2	30/11/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/A		

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 13-Oct-22 To: 18-May-23	Nine ICPs were connected prior to recording of the accepting trader in the registry. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as they will eliminate risk to an acceptable level. The audit risk rating is assessed to be low as the volume of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
N/A		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Please refer to audit reference 3.4	30/11/2023	

Connection of NSP that is not point of connection to grid		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 10.30 From: 10-May-23 To: 22-May-23	The MEP identifier and meter installation certification expiry date advised after 14 business days for NSP WHA0221. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as an agreement was in place with AMCI as MEP and the metering installation was certified at the time of connection. There is no impact on settlement and participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Please refer to audit reference 6.9		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: clause 8 schedule 11.1</p> <p>From: 01-Oct-22</p> <p>To: 11-Jul-23</p>	<p>53 late address updates.</p> <p>130 late updates to decommissioned status.</p> <p>318 late other network updates.</p> <p>1,839 late distributed generation updates.</p> <p>1,282 late NSP changes.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as the checks in place will mitigate risk most of the time.</p> <p>There is a potential minor impact on settlement, hence the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Address: Please refer to audit reference 2.1 and 2.2.</p> <p>Decommission: To mitigate the number of errors, the registry “ready to decom” report is run for VECT and UNET monthly and the required remediations will be addressed and fixed.</p> <p>Distributed Generation: Please refer to audit reference 2.1</p> <p>NSP: Please refer to audit reference 4.2</p>	30/11/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clause 7(1)(b) Schedule 11.1 From: 01-Oct-22 To: 11-Jul-23	24 of the 30 ICPs sampled mapped to the incorrect NSP. 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 rated as moderate as the checks in place will mitigate risk most of the time but there is room for improvement in the assignment of NSPs to new ICPs. The risk rating is low as Vector has one balancing area per network and therefore an incorrect NSP has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
"Pending" Platforms have been created in Gentrack for each of the NSPs along with instructions provided on how to allocate a new ICP to the required "Pending" Platform (where no valid Platform exists).	Beginning of 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The Registry Audit Comparison Report for NSP Discrepancies is run monthly, and this is regularly reviewed and ICP's are remediated, where required. A report is run regularly to identify ICPs that are located more than 1km away from their expected location. This report is regularly reviewed and ICP's are remediated, where required.	Ongoing Ongoing	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Oct-22 To: 11-Jul-23	1,502 ICPs with addresses that are not readily locatable or are duplicates. 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	Controls are rated as moderate as whilst the process for new connections is robust there are still a high number of historic addresses to be confirmed. The risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
This is an ongoing piece of work. Vector continues to work on trying to identify and correct these historical address issues and are requesting help from the traders to resolve these.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/A		

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Oct-22</p> <p>To: 11-Jul-23</p>	<p>11,691 ICPs had missing initial electrical connection dates.</p> <p>359 ICPs with potentially incorrect initial electrical connection dates on the registry.</p> <p>Distributed generation details not populated for ten of a sample of 20 ICPs.</p> <p>Seven ICPs with incorrect unmetered load details.</p> <p>Seven "GN" ICP with an incorrect NSP dedication flag of "Y".</p> <p>Six LE ICPs with the incorrect NSP dedication flag of "N".</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as there is room for improvement.</p> <p>The audit risk rating is assessed to be low as the discrepancies have only a minor impact to the market.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NSP Flag: All errors have been fixed</p> <p>Distributed Generation: Please refer to audit reference 2.1.</p> <p>IECD discrepancies: Checking with warranted persons and traders to confirm the correct date and will update registry where necessary.</p> <p>Vector will continue to use compliance report to identify IECD discrepancies and will be addressed monthly.</p>	<p>Completed</p> <p>Ongoing</p> <p>30/11/2023</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NSP Flag: Further training will be provided for staff to identify and allocate the correct NSP flag for each ICP.</p>	30/11/2023	

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 7(3) Schedule 11.1 From: 26-Apr-23 To: 18-May-23	Price category code was updated 16 business days after trading commenced for one ICP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as Vector has updated the price code prior to trading for all but one ICP. The audit risk rating is recorded as low as only one ICP was affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Please refer to audit reference 3.4	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/A		

GPS coordinates		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 7(8) and (9) Schedule 11.1 From: 01-Oct-22 To: 11-Jul-23	93 ICPs with the incorrect GPS co-ordinates recorded in the registry. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as the new connection process includes steps to ensure the accuracy of GPS coordinates. The audit risk rating is assessed to be low due to the number of ICPs found with the incorrect co-ordinates recorded.	
Actions taken to resolve the issue	Completion date	Remedial action status
Validate process to be reviewed and updated to include GPS checks for addresses.	30/11/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Further staff training is required to help identify in the validation process checks of the GPS co-ordinates for addresses	30/11/2023	

Creation and decommissioning of NSPs		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 11.8 and Clause 25 Schedule 11.1 From: 01-Apr-23 To: 04-Apr-23	Reconciliation manager notified late of the creation of NSP WHA0221. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as notification was provided within 27 days. There is no impact on settlement and participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
AMCI's standard process is to send new certification paperwork to the RM for a NSP as soon as paperwork is available from the certifying test house and where possible within the EA Code required timeframes. In this case paperwork was not sent. In mitigation there was still a review underway by the RM and Vector Metering regarding this interconnection point and AMCI had not actually formally accepted to be the MEP until the 7 th of August 2023. AMCI also did not receive any separate requests from the RM to provide certification paperwork. Going forward AMCI will send certification paperwork to the RM irrespective whether AMCI has formally accepted MEP responsibility on a NSP or not		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Responsibility for metering information when creating an NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 10.25(2) From: 10-May-23 To: 22-May-23	The MEP identifier and meter installation certification expiry date advised after 14 business days for NSP WHA0221. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as an agreement was in place with AMCI as MEP and the metering installation was certified at the time of connection. There is no impact on settlement and participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>AMCI had not formally accepted MEP responsibility on this interconnection point until the 7th of August 2023. This was partly due to AMCI requiring clear confirmation that the Code requirements regarding data provisioning had been met. This clarification was provided by Provera on the 7th of August 2023 and in response to Provera we advised that AMCI would accept MEP responsibility for this NSP. AMCI updated our system to reflect this. At that stage AMCI did not forward any certification paperwork to the RM or Provera.</p> <p>Vector initially applied for a Code exemption from becoming a Certified Reconciliation Participant for the purposes of volume submissions to the RM. That exemption process was discussed extensively with the Electricity Authority Compliance Team and upon advice as to the appropriate course of action, Vector became certified as a CRP and the audit by Provera was then completed.</p> <p>Note: Certification paperwork for the NSP was already loaded up in AMCI's system from the 15th of May 2023 but it was not sent to the RM at that stage due to the outstanding review which was underway.</p>	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	