

Compliance plan for Unison Distributor Audit 2023

Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: 11.2(1) and 10.6(1)</p> <p>From: 06-Sep-21</p> <p>To: 01-Feb-23</p>	<p>Not all practicable steps are taken to ensure that the information provided is complete and accurate.</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	
Low	<p>The registry discrepancies processes are robust, and the number of discrepancies was low.</p> <p>The inaccurate information has a small impact on other participants and on settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>The four ICP's showing incorrect NSP's have now been corrected.</p> <p>The one ICP concerning distributed generation has been corrected.</p> <p>The two ICPs with the incorrect unmetered load are being corrected.</p> <p>The one ICP with the incorrect Initial Electrical connection date was corrected during the audit.</p>		28/07/2023
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We will work with our information technology team to identify whether there are further automated controls that can be put in place.</p>		<p>To be determined based on complexity of any solution.</p>
Investigating		

Removal or breakage of seals		
Non-compliance	Description	
<p>Audit Ref: 2.3</p> <p>With: Clause 48(1A) and 48(1B) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 06-Feb-23</p>	<p>Seal information is not recorded and is not traceable to the person fitting the seal.</p> <p>MEPs are not notified when seals are broken.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because control devices are sealed, and notification is provided to the MEP via the trader.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Not applicable		Not applicable
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We will work on a way of keeping records of the seals which are broken.</p> <p>We will review our process of notifying the trader with a view to notifying the MEP also.</p>		Within the next 3 months.
		Identified

Provision of information on dispute resolution scheme			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11.30A From: 07-Sep-21 To: 01-Feb-23	Utilities Disputes service information not provided via Facebook messenger. 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 as this has been corrected. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
UDL service information is now present in automated response on Facebook Messenger.		04/07/2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Not applicable		Not applicable	

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3) From: 16-Dec-21 To: 20-May-22	One LE ICP not created or reason for delay not communicated within three business days. 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 rated as strong overall as the process for standard ICP creation is well established and LE ICP requests are rare. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Not Applicable	Not applicable	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Review LE ICP creation process, particularly in relation to who is contacted during the process.	Within the next 3 months.	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 07-Sep-21</p> <p>To: 01-Feb-23</p>	<p>Registry not updated prior to commencement of trading for two ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as there are robust controls in place.</p> <p>The audit risk rating is low as this affected only two ICPs and both were remedied as soon as they were brought to Unison's attention. .</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will request our authorised contractors to ensure that they are only living as per the authorisation at their next review.	Normally within the next two months	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 08-Sep-21 To: 01-Feb-23	Late population of the initial electrical connection date for 87 ICPs (5%). 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	Controls are rated as strong as there are robust controls in place to ensure these are populated on time and correctly. The potential impact is low as the number of late updates is low as proportion of the total ICPs electrically connected.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will reinforce with the livening agents the importance of providing the appropriate paperwork in a timely fashion. .	Normally within the next two months	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Monitoring of "new" & "ready" statuses		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 15 of Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	ICPs at "new" or "ready" for 24 months not confirmed as required in all instances. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as the process is robust but hasn't been able to be actioned due to mitigating circumstances. The potential impact is assessed to be low as the number of ICPs that have been at "new" and "ready" for 24 months is relatively low. .	
Actions taken to resolve the issue	Completion date	Remedial action status
These were corrected with the necessary changes made. Additional resources have been made available to support this activity.	28/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional checks will be implemented in the process.	Within the next 2 months	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	10,016 late address updates. 774 late price updates. 73 late decommissioning status updates. Seven late network event updates. 14 late distributed generation updates. 12,619 late NSP changes. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak as the Gentrack issue where the file upload size is limited is causing delays in bulk updates getting to the registry. The impact on settlement and participants has a potential to be medium but is rated as low as NSP changes are generally within in the same balancing area.	
Actions taken to resolve the issue	Completion date	Remedial action status
Not applicable	Not applicable	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Create a job with Information Technology to investigate the issue with Gentrack Wizard.	Within the next 2 months.	

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	Four ICPs with an incorrect NSP recorded. 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 but are expected to move to strong once the mapping issue for new ICPs in Rotorua is resolved. The audit risk rating is low as only four ICPs were found to be mis-mapped and none were in the incorrect balancing areas.	
Actions taken to resolve the issue	Completion date	Remedial action status
All the incorrect entries have now been corrected	28/07/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with our IT department to resolve issues going forward.	Not applicable	

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 of Schedule 11.1</p> <p>From: 07-Sep-21</p> <p>To: 01-Feb-23</p>	<p>Six ICPs with duplicate addresses.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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 with the ICP creation process.</p> <p>The audit risk rating is low as no active ICPs were found with duplicate addresses.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP's that have been created as double up have been deleted on the Registry with the Status – Deleted as account set up in error.	28/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Questions will need to be asked of the customer or Electrician if an application is submitted for a connection at the same address of an ICP that has already been created as to whether it is a duplicate or if it is for a different lot at the same address.</p> <p>Checks are being conducted across 2 teams before ICP is created.</p>	Ongoing task.	

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	One ICP with distributed generation recorded where none is present. Two ICPs with the incorrect unmetered load details recorded. One ICP with the incorrect initial electrical connection date recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate overall. The process to populate distributed generation with the expected connection date ensures these get to the registry on time but the correct event date is not recorded in all instances, and I recommend a process improvement above. The impact on settlement and participants is assessed to be low as overall the information populated to the registry has a high level of accuracy.	
Actions taken to resolve the issue	Completion date	Remedial action status
Necessary changes were made for relevant ICPs.	28/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reporting regularly for distributed generation ICP's. Review processes regarding communication with customers and streetlighting, and external contractors as part of the new connection process.	Not applicable	

Management of “decommissioned” status		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 20 Schedule 11.1 From: 06-Sep-21 To: 01-Feb-23	Six of sample of ten ICPs checked recorded with the incorrect decommission date. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate as there is room for improvement. The impact is assessed to be low as this is information is post the ICP being traded so has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Not applicable	Not applicable	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
More checks will be put in place to ensure the correct date is used. This has no direct impact on reconciliation. Mindful that Retailers also can contribute to a date discrepancy.	Within the next 2 months.	