

# Compliance plan for Wellington Electricity, Distributor Audit 2024

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3)  From: 01-Nov-22 To: 25-Sep-23	One ICP of a sample of 30 ICPs was not created within three business days and notification not provided to the participant.  Potential impact: Low  Actual impact: Low  Audit history: Twice previously  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong, as the controls are robust and will mitigate risk to an acceptable level.  The audit risk rating is assessed to be low as the vast majority of ICPs are created within three business days of request. .	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our daily checks process tracks all requests, providing a daily update of the number of days each request is at, and highlighting any that are due. Additional resource has also been added to the connections team to assist with workload.		

<b>Timeliness of Provision of ICP Information to the registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Nov-22 To: 25-Sep-23</p>	<p>Three ICPs not created or made "ready" on the registry prior to these connections being electrically connected.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once previously</p> <p>Controls: Moderate Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as moderate and will mitigate risk most of the time, but GTV not allowing the correcting of the first start date to be earlier prevents the controls from being strong as duplicate ICPs have to be created to work around this.</p> <p>The impact is assessed to be low as the three backdated ICPs were exceptions, and all were corrected as soon as possible and not indicative of any systemic issues.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
No action required as all ICP's were corrected as soon as they were identified.		Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Review Gentrack functionality for backdated ICP's & status reversals.	Oct '24	
Develop guidelines for the Connections team on completing reversals in Registry and when they can/should be used.	Aug '24	

<b>Timeliness of Provision of Initial Electrical Connection Date</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Nov-22 To: 25-Sep-23	Some late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong and have been strengthened during the audit period with livening agents providing paperwork directly to Wellington Electricity. The audit risk rating is low as the vast majority of dates are populated within the required timeframe ensuring that traders can confirm they have the correct first "active" date.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
No action required		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Further enhance process for using MEP livening information to cross check all new connections.	Sep 2024	

Connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.6 With: Clause 11.17</p> <p>From: 01-Nov-22 To: 25-Sep-23</p>	<p>Three ICPs where the trader was not recorded as accepting responsibility in the registry prior to electrical connection.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once previously</p> <p>Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as strong as the processes in place have been strengthened during the audit period with greater cohesion between the projects team and the connection team.</p> <p>The audit risk rating is assessed to be low as these were three exceptions and were corrected as soon as they were identified.</p>	
Actions taken to resolve the issue		Completion date
Trader advised and ICPs created as soon as issue was identified. No further action required.		
Preventative actions taken to ensure no further issues will occur		Completion date
Review Gentrack functionality for backdated ICP's & status reversals.		Oct 2024
		Investigating

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Nov-22</p> <p>To: 25-Sep-23</p>	<p>Ten late address updates.</p> <p>Two of a sample of 15 ICPs with late pricing updates of a possible 400 late updates.</p> <p>Ten late network updates from a sample of ten, from a possible 271 late network updates.</p> <p>Eight of a sample of ten ICPs of a possible 185 late distributed generation updates.</p> <p>Ten late status updates from a sample of ten, from a possible 26 status updates.</p> <p>Four of a sample of 25 late NSP changes from a possible 48 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	
<b>Low</b>	<p>Controls are rated as moderate as they will mitigate risk most of the time.</p> <p>The audit risk rating is low overall the timeliness of updates to the registry is high and all are updated within the 14-month revision period.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Updates were made as soon as correct information received.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Review a fix with Gentrack to ensure update date is used in Registry when GPS coordinates are added rather than last address event date.	Oct 2024	
Further enhance process of using Record of Inspection information to update DG.	Jun 2024	

ICP location address			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clauses 2 Schedule 11.1</p> <p>From: 01-Nov-22</p> <p>To: 25-Sep-23</p>	<p>Two ICPs with the same address.</p> <p>298 "active" ICPs without a readily locatable address.</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		
<b>Low</b>	<p>Controls are rated as strong as the ICP creation process has been strengthened and this mitigates the risks to an acceptable level. The non-compliance relates to historically created ICPs.</p> <p>The audit risk is assessed to be low as the number of ICPs not readily locatable is relatively small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Investigate and resolve historical ICP's with not Unit or Street number.		Oct 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Undertake review of all ICP address information to identify further address clarification/strengthening on historical ICP's		Oct 2024	

GPS coordinates		
Non-compliance	Description	
Audit Ref: 4.8 With: Clauses 7(8) and (9) Schedule 11.1 From: 01-Nov-22 To: 25-Sep-23	53 ICPs with the incorrect GPS co-ordinates. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong now as the use of GPS co-ordinates has been clarified and is well understood. The audit risk is assessed to be low as the number of ICPs affected is small and is in the process of being corrected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Correct GPS coordinates on all ICP's to correct NZTM2000 format	Jun 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process notes for determining GPS coordinates to be updated to ensure correct format.	Apr 2024	