

Compliance Plan The Lines Company Distributor 2024

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Mar-23 To: 13-Nov-23	Some incorrect address, initial electrical connection date, distributed generation and NSP information was identified during the audit. All confirmed exceptions were corrected during the audit except two ICPs with incorrect distributed generation details. 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 rated as strong as validation occurs regularly and most errors are corrected soon after discovery. The audit risk rating is assessed as low as the volume of errors is small in relation to the number of ICPs managed.	
Actions taken to resolve the issue	Completion date	Remedial action status
TLC has been updating addresses. There are approximately 3,000 remaining. Updated the two distributed generation ICPs.	30/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
1. Use of pre-populated address fields in Axos; 2. Ongoing education and monitoring of distributed generation connections.	8/03/2024	

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: 10-Jan-23 To: 08-Sep-23	Two ICPs were made “ready” after electrical connection, and therefore trading, had occurred. Potential impact: Low Actual impact: Low Audit history: Twice 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	Remedial action status
Follow-up with retailer to update Registry.		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Ensure that connections are not livened without a retailer loaded on the Registry for an ICP. Achieve this by requiring staff to check the Registry and not rely on emails from retailers. Prepare a step-by-step document walking through the process; a verifier is passed the documentation to ensure correct set-up. Periodic review (weekly) of new connections. Investigate Axos not allowing input until all fields are populated.	19/02/2024	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Mar-23 To: 13-Nov-23	Late population of the initial electrical connection dates for 74 ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate because most initial electrical connection updates were completed on time. The audit risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Process and instructions for contractor to return paperwork in a timely manner.	April 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Set up a process to keep track of the outstanding livening jobs.	April 2024	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: 11.17 From: 10-Jan-23 To: 08-Sep-23	A trader was not recorded on the registry on the initial electrical connection date for two ICPs. Potential impact: Low Actual impact: Low Audit history: Twice 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	Remedial action status
Registry updated.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Further training – flag in Axos?	April 2024	

Meter bridging		
Non-compliance	Description	
Audit Ref: 3.18 With: Clause 10.33C From: 07-Nov-23 To: 14-Nov-23	Retailer not notified of bridged meter within one business day. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because TLC has improved its processes to notify retailers most of the time but there is room for improvement. The audit risk rating is assessed to be low because: <ul style="list-style-type: none"> • the number of bridged meters is low, and • the impact on reconciliation is expected to be low, because the bridging events which are not notified normally have a short duration. 	
Actions taken to resolve the issue	Completion date	Remedial action status
There was a misunderstanding about the different scenarios of bridged meters. This has been clarified. Reporting is being updated to ensure all bridged meters are identified for notification to the retailer.	May 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above.	May 2024	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 of Schedule 11.1 From: 01-Mar-23 To: 13-Nov-23	Two late address updates. Four from a sample of ten late pricing updates. 16 late updates to decommissioned status. 42 late distributed generation updates. Three late updates to the direct billed status. 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. The audit risk rating is assessed as low as the impact on reconciliation is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
All updated actions.	March 2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Clarification of the dates to update the Registry, plus investigating a new process for DG installations - DG is a problem all around as TLC often has no knowledge of DG installations; where we have the knowledge, we don't or receive the ROI late. Agree there is room for improvement.	March 2024	

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 01-Mar-23</p> <p>To: 13-Nov-23</p>	<p>404 ICPs with an incorrect address region recorded on the registry.</p> <p>An unknown number of other ICPs are likely to have incorrect address regions recorded.</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	
Low	<p>The controls are rated as strong overall as they prevent duplicate and incomplete addresses. TLC is actively working to reduce the number of ICPs with an incorrect region recorded.</p> <p>The audit risk rating is low. All ICPs are expected to be located in Waikato or Manawatu, and TLC uses the suburb and town fields where information is available which will help reduce the risk that other parties may not identify the correct ICP for the address.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
All address are being updated with approximately 3,000 to go.	May 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Use Axos default address sourced from LINZ, NZ Post and Stats NZ	19/02/2024	

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Mar-23</p> <p>To: 13-Nov-23</p>	<p>Initial electrical connection dates</p> <ul style="list-style-type: none"> One ICP created during the audit period, and three ICPs created and connected prior to the audit period (but after 29 August 2013) had incorrect initial electrical connection dates. One network event populating the initial electrical connection date had an incorrect event date applied. <p>Distributed generation</p> <ul style="list-style-type: none"> Three ICPs had incorrect distributed generation details. <p>NSP</p> <ul style="list-style-type: none"> Incorrect NSP dedicated flag for one ICP. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have rated the controls as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is assessed as low, as all the affected data has been corrected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Set NSP to No. DG issue being investigated and to update.	June 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training, investigate with Axos about having a warning label when ticked, and exception reporting.	April 2024	

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 10.25(1) & 10.26(1) From: 27-Nov-23 To: 12-Dec-23	Metering installation certification details were not provided to the reconciliation manager within 20 business days of recertification for TLC0111. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated strong because the TLC process ensured that certification details were provided the day the certification report was received. The audit risk rating is assessed as low as the impact on reconciliation is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Reliant on MEP and their contractor to certify the meter.	12/12/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Set calendar reminders of meter expiry and renewal date and request MEP completes job early. If continued delays occur, escalate task.	March 2024	