

## Compliance plan for Electricity Invercargill (ELIN) - 2022

Non-compliance	Description	
Audit Ref: 2.5 With: clause 11.2 and Clause 10.6  From: 01-Dec-20 To: 30-Apr-22	Information for a small number of ICPs, for both TPCO and ELIN, is missing or not up to date.  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 assessed as moderate. Monitoring and correction processes are in place and registry data is corrected as anomalies are identified. PowerNet is committed to accurate registry data even where backdating is required with consequent non-compliance. There was no impact on settlement outcomes. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Due to historic information there are still a small number of anomalies regardless of how much accuracy PowerNet strive to achieve. These are being corrected as the ICPs come up for recertification and the information is relayed back to us to input correct data into the registry.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Accuracy when all new data is being entered	Ongoing	

Non-compliance	Description		
Audit Ref: 4.10 With: clause 3 of Schedule 11.4  From: 01-Dec-20 To: 30-Apr-22	ELIN/TPCO- Registry metering information updated later than 10 business days for a small percentage of metering installation records  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 assessed as strong. Monitoring and correction process are in place and registry data is corrected as anomalies are identified. PowerNet is committed to accurate registry data even where backdating is required to comply with clause 11.2 even with the consequent non-compliance. . There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The rule for timeframe for Registry updates is well understood, and every endeavour is made to comply. However, at times circumstances will be such that to comply with rules requiring complete accuracy backdating will occur.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As data continually improves less need for back dating is expected		Ongoing	

Non-compliance	Description		
Audit Ref: 5.1 With: clause 4(1)(a)(b) of Schedule 10.6 & Table 1 of Schedule 11.4 From: 01-Dec-20 To: 30-Apr-22	ELIN do not have certification information for 512 Metec Q meter Installations Potential impact: None 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 assessed as moderate. This is a known industry issue. The issue is being managed and will correct itself as the meters are removed from service. There was no impact on settlement. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an historic situation relating to meters purchased a number of years ago. As time goes on these meters are being withdrawn from service, thus the situation is diminishing and with only 991 installations remaining it is expected to replace these during the next audit period where customer approval is granted		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
With recent meter purchases, certification documents are obtained. No reoccurrence is expected.			

Non-compliance	Description		
Audit Ref 6.2 With: clause 7(1)(2)(3) of Schedule 11.4 From: 01-Dec-20 To: 30-Apr-22	A relatively small number of control device discrepancies. <ul style="list-style-type: none"> <li>• 7 ELIN LCD missing records in Registry</li> <li>• 41 TPCO LCD missing records in Registry</li> </ul> Potential impact: None 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 assessed as strong because there is a robust the Metering Database and processes in place. The issue is being managed and will correct itself as metering is upgraded and transitioned to SMCO.  There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is being corrected as we are replacing meters for recertification.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Using the Audit Compliance report run monthly to identify these discrepancies and ensuring these issues are prioritised to be corrected.		Ongoing Monthly Checks	

Non-compliance	Description		
Audit Ref 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 01-Dec-20 To: 30-Apr-22	<ul style="list-style-type: none"> <li>TPCO – 920 ICPs with expired certification</li> <li>ELIN -387 ICPs with expired certification</li> </ul> Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as weak. There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Statistical sampling project that is being finalised Recent batch of meter replacements for recertification issued to reach majority of these sites given customers grant access.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Statistical sampling project completed sooner			

Non-compliance	Description		
Audit Ref 7.15 With: Clause 26(1) of Schedule 10.7 From: 01-Dec-20 To: 30-Apr-22	<ul style="list-style-type: none"> <li>• TPCO - 920 ICPs with expired meter certification</li> <li>• ELIN - 387 ICPs with expired meter certification</li> </ul> Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as weak. 1,295 installations have expired installation certification. The statistical sampling process had started well in advance but after 8 months meters were just dispatched to Delta ATH.  There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
A program of recertification of installations is underway for the remaining ICP's when recertification is required		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Certification expiry is monitored and recertification initiated.		Ongoing	

Non-compliance	Description		
Audit Ref 7.16 With: Clause 28(1) of Schedule 10.7 From: 01-Dec-20 To: 30-Apr-22	<ul style="list-style-type: none"> <li>• TPCO – 3 ICPs with expired CT certification</li> <li>• ELIN -9 ICPs with expired CT certification</li> </ul> Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed as moderate because there is a robust process in place. Circumstances impacted the recertification programme to some degree. The audit risk rating is recorded as low due to low number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Recertification project is underway trying to achieve certification			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Certification expiry is monitored and recertification initiated.			

Non-compliance	Description		
Audit Ref 8.2 With: Clause 46(1) of Schedule 10.7 From: 01-Dec-20 To: 30-Apr-22	3 category 2 installations for which TPCO is responsible were not inspected and 9 category 2 installations for ELIN were not inspected within the applicable period 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 assessed as moderate because there is a robust process in place. Circumstances impacted the recertification programme to some degree. The audit risk rating is recorded as low due to low number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
For Cat 2 installations inspections fall due at the same time as certification expires, therefore there is no intention to carry out inspections. Installations will be recertified as has been outlined earlier in this report.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing recertification			