

Compliance Plan for Ventia NZ Operations Ltd MEP – 2022

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11.2 and Clause 10.6 From: 01-Feb-22 To: 10-Aug-22	All practicable steps have not been taken to ensure information is complete and accurate. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate in this area as there is room for improvement. 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 comparisons have been made with our own database and updates made where necessary, ongoing registry comparisons are made each month.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Calendar reminders have been made for the completion of the Registry comparisons.	27/9/2022	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Feb-22 To: 24-Jun-22	Five records updated on the registry later than 10 business days. 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	I have recorded the controls as moderate in this area as there is room for improvement. The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Without checking every update why updates were late we have endeavoured to update the registry as soon as we have received all the paperwork from the ATH	27/9/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
It is likely that some of the above are due to correcting incorrect information entered into the Registry.	27/9/2022	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6 From: 01-Feb-21 To: 24-Jun-22	Some inaccurate or incomplete information in certification report fields. 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 they mitigate risk most of the time but there is room for improvement. 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
The latest Ventia paperwork records a CT burden certification range. And this information will be requested from other contractors.	27/9/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The latest Ventia paperwork records a CT burden certification range. And this information will be requested from other contractors.	27/9/2022	

Provision of Registry Information		
Non-compliance	Description	
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Dec-20</p> <p>To: 24-Jun-22</p>	<p>Incorrect registry information.</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>I have recorded the controls as moderate in this area as there is room for improvement.</p> <p>The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>The reports for the sites are from VirCom EMS not Vector AMS, hence their registry ATH identifier should be VEMS not VCOM.</p> <p>I will however review these and change any remaining VEMS ATH to VCOM</p>		27/9/2022
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The reports for the sites are from VirCom EMS not Vector AMS, hence their registry ATH identifier should be VEMS not VCOM.</p> <p>I will however review these and change any remaining VEMS ATH to VCOM</p>		27/9/2022
		Identified

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 31-Jul-22 To: 10-Aug-22	Registry validation not conducted for every month of the audit period. 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 because Ventia has a validation process, but it has not been run each month. 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
The required changes have been made and the Registry comparison are again being carried out	27/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The required changes have been made and the Registry comparison are again being carried out with calendar reminders set to require the comparison to be made.	27/9/2022	

Cancellation of Certification		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 14-Dec-18 To: 10-Aug-22	Certification cancelled, and registry not updated for two installations with low burden, one of which was not monitored for certification as a lower category. Potential impact: Medium Actual impact: Medium Audit history: Multiple Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as weak because the issues raised have been raised in four audits now and have not been addressed. The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
There is a well documented disagreement on the burden issue	27/9/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
This will be reviewed again in the near future	27/9/2022	

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 14-Dec-18 To: 10-Aug-22	Certification expired for two metering installations. Certification cancelled for two metering installations. Potential impact: High Actual impact: Medium Audit history: Multiple Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate as there is a process to ensure expired certification is identified and recertified. There is room to improve processes regarding cancelled certification. The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
The certification was not cancelled due to a differing opinion on whether the certifications should be cancelled. I will however review this situation and the decision not to cancel the certifications.	27/9/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
The certification was not cancelled due to a differing opinion on whether the certifications should be cancelled. I will however review this situation and the decision not to cancel the certifications.	27/9/2022	