

Compliance plan for Trustpower MEP - 2018

Participants to Provide Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11.2 and Clause 10.6</p> <p>From: 01-Jan-17</p> <p>To: 12-Nov-17</p>	<p>Registry not always updated as soon as practicable in some cases.</p> <p>Potential impact: Medium</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 recorded as moderate because there is room to improve the timeliness of some registry updates.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Continue to monitor and improve reporting. Influence contractor and Network behavior's where that is having an impact on timeframes for updates.</p> <p>Although it was identified as part of the audit preparation that some inspections had not been completed, establishing which sites were no longer certified as a result of the late inspection was only carried out after the Auditors site visit which impacted the registry update timeframe. This is considered a one off event, as the learnings will be rolled into the established business process.</p> <p>We believe waiting to clarify the understanding with auditor in this situation did constitute taking action in a practicable timeframe – albeit outside the obligatory code requirement</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Continue to monitor and improve reporting.</p> <p>We believe we are very good and most instances fall outside of our control or required further investigation to enable us to process.</p> <p>NB: Due to the low numbers and low impact it is our view that this could justifiably hold a lower risk rating.</p>		Ongoing
		Disputed

Registry Notification of Metering Records			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jan-17 To: 12-Dec-17	5 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are in place to ensure the timeliness of updates, but Trustpower is sometimes prevented from updating the registry due to late nomination. The impact on other participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken		completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Trustpower considers this to be a high level of compliance and in a practical sense we don't believe further corrective actions are possible.		Ongoing	

Metering Installation Design & Accuracy			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 17-Mar-17 To: 14-Sep-17	Error and uncertainty calculations not always conducted correctly by ATHs. 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 because there is room to improve the records provided by ATHs and their processes. There could be a minor impact on metering installation accuracy; therefore, the audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>Advised Delta of non-compliance, and corrective actions required on their behalf</p> <p>Although the form did not include the calculation it included the data to enable the Trustpower Test House to establish that if the temperature had been correctly applied the sites were still within the allowable tolerances and compliant.</p> <p><i>Refer: Participant Response</i></p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to monitor and check Test House certification and compliance with requirements.	Ongoing	

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-Jan-17</p> <p>To: 12-Dec-17</p>	<p>Some records updated on the registry later than 10 business days.</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 because there is room for some improvement.</p> <p>The impact on participants, customers or settlement is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Remedial action status
<p>Two which were in our control were resolved as soon as identified and addressed appropriately going forward.</p> <p>Many of these are corrections to historic data. We seek advice on how to update these and not appear on this report, as they are updated when resolved.</p> <p>Statistical sampling: Better understanding of dates when updating registry of statistical sampling. Chose the 1st of the month as certification date instead of the date of the registry update. We note the update occurred at 12 days not the required 10 days.</p> <p>Included in the bulk update to reflect the statistical sampling outcomes was a technical error in administration, this has little to no impact.</p>		Completed

Preventative actions taken to ensure no further issues will occur	Completion date	
Continue with our reports and influencing contractors in regards to timeframes of information	Ongoing	

Accurate and Complete Records		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1) of Schedule 10.6</p> <p>From: 01-Jan-17</p> <p>To: 12-Dec-17</p>	<p>Some inaccurate certification records.</p> <p>Potential impact: Medium</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 because there is room for improvement.</p> <p>There is a minor impact on other participants; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Rectify known data issues</p> <p>Intellihub Certification form has already been modified since first AMI Meters deployed and future releases are scheduled to ensure continuous improvements.</p>		01/03/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Improve, documentation, reporting and training of processing staff.</p> <p>Will review the list of non-compliances and where an opportunity exists to introduce a new control, and the exception is not already identified or being managed, we will introduce new reporting.</p> <p>For example; meter certification details and certifying test house are held in our Asset management system not on the site certification form. We don't believe further controls are required in this area.</p>		Ongoing

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-Jan-17</p> <p>To: 12-Dec-17</p>	<p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</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 strong in this area. There are still a small number of areas where improvement can be made.</p> <p>Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
We agree with the auditors findings and will continue to prioritise and rectify identified issues. However we note and agree with the auditor that very few of these discrepancies have an impact and that Trustpower has continued to make good progress in bringing overall numbers down.		31/03/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Improve reporting to identify those that have an impact.</p> <p>Where appropriate, attempt to duplicate the control reports that were run by the auditor, and include these as part of our own checks</p>		Ongoing
		Identified

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Jan-17</p> <p>To: 12-Dec-17</p>	<p>Certification cancelled and registry not updated within 10 business days for 57 ICPs without inspections within the allowable window and 22 installations with a single phase meter on a three phase installation.</p> <p>Potential impact: Medium</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>I have recorded the controls as moderate in this area because the Category 2 installations were identified and it was expected that the AMI deployment would occur prior to the need for inspections.</p> <p>The issues found can all potentially have a minor impact on other participants and on settlement. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Cancel Certification where compliance is now invalid</p> <p>Breach was only identified as part of the Audit process and these were completed on discovery.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Ensure Reporting identifies when inspections are not completed within required window.</p> <p>Update process documentation to change Certification if the above occurs.</p> <p>Ensure Staff are aware of above.</p>		01/03/2018
Remedial action status		
Identified		

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: 01-Apr-15 To: 31-Dec-17	Certification expired for 801 ICPs. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	I have recorded the controls as moderate in this area because certification has been expired for a number of years for some ICPs and because some of the expired installations were fully certified at one point. The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continue to actively reduce the number of uncertified sites.		On Going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue Compliance programs		On Going	

Control Device Bridged Out	
Non-compliance	Description
<p>Audit Ref: 7.11</p> <p>With: Clause 35 of Schedule 10.7</p> <p>From: 31-May-17</p> <p>To: 20-Jun-17</p>	<p>Reconciliation participant not notified of bridged control device within 10 business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are recorded as strong because only one example was found.</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	Remedial action status
Due to Queens birthday weekend we missed obligation by 1 or 2 working days - None	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
None – This is an exception and are confident we have the controls in place to comply.	Completed	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 12-Dec-17	706 ICPs with expired interim certification. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate in this area because certification has been expired for a number of years for these ICPs. The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue to actively reduce the number of uncertified sites.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue Compliance program	Ongoing	

Category 2 to 5 Inspections		
Non-compliance	Description	
<p>Audit Ref: 8.2</p> <p>With: Clause 46(1) of schedule 10.7</p> <p>From: 01-Jan-17</p> <p>To: 12-Dec-17</p>	<p>57 Category 2 inspections not conducted within the allowable window of +/- 6 months</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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>The controls are recorded as moderate because there is room for improvement.</p> <p>The impact on settlement and participants is unknown. These installations will be raised in the priority order for AMI deployment, which will minimise the risk; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Updated registry to reflect that the sites are uncertified		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Add a 6 month window to certifications dates when establishing the program of work reporting so that our administrator and contractors are fully aware of time frames in which this work is required to be carried out.</p> <p>Improve management of Audits – Continue inspection program and recertify sites now deemed uncertified</p>		Completed
		Identified