

Compliance Plan Network Waitaki Distributor 2024

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 16-Mar-22 To: 01-Mar-24	One ICP with insufficient address information was recorded on the registry. Six ICPs created and electrically connected during the audit period had incorrect initial electrical connection dates. Two ICPs with unmetered load incorrectly recorded on the registry. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as Network Waitaki has robust processes to identify discrepancies and most corrections are made promptly. The audit risk rating is assessed to be low as the volume of ICPs affected is small and all corrections have been made.	
Actions taken to resolve the issue	Completion date	Remedial action status
All have been corrected	30/04/24	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Clarified processes around determining initial electrical connection dates	30/04/24	

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-Jun-22 To: 02-Feb-24	23 late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong in this area as Network Waitaki has checks in place to identify and resolve discrepancies and the number of late updates was low. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
These were identified and corrected at time of audit.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
A daily report is run out of Revman which is checked daily by ICP management team which picks up these errors/ discrepancies so they can be fixed straight away.	April 2024	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Jun-22 To: 02-Feb-24	Five late address updates. Seven late pricing updates from a sample of ten backdated events. Ten late updates of distributed generation information. 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	I have recorded the controls as strong in this area as Network Waitaki has checks in place to identify and resolve discrepancies and the number of late updates was low. There is a minor impact on participants with late updates. The Audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
These were identified and corrected at time of audit.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Processes have been clarified, particularly around decommissioning, distributed generation, and pricing. Reports that are run out of Revman also assist with identifying discrepancies.	April 2024	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 16-Mar-22 To: 01-Mar-24	One ICP with insufficient address information was recorded on the registry. 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 because they mitigate risk to an acceptable level. There is no impact on settlement and participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
This was corrected at the time of audit.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Clarification around what makes a complete address so that ICP management team understands what is required going forward. Have added additional notes to process in Promapp to highlight this.	April 2024	

Distributors to Provide ICP Information to the Registry		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1)(o) of Schedule 11.1 From: 01-Jun-22 To: 02-Feb-24	Incorrect initial electrical connection dates recorded in the registry for six ICPs. Incorrect unmetered load details recorded in the registry for two ICPs. 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 recorded as strong because of the low number of inaccuracies identified. The audit risk rating is low as the errors found have a minor effect on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
These were identified and corrected at time of audit.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
ICP management team will check the daily report from Revman on a daily basis to pick up any discrepancies and rectify them as soon as possible.	April 2024	

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 7(3) Schedule 11.1 From: 23-Nov-22 To: 01-Dec-22	Price category code was updated 16 business days after trading commenced for one ICP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as the Network Waitaki process normally ensures the price code is updated prior to trading. The audit risk rating is recorded as low as only one ICP was affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Unable to do anything to resolve this specific issue – correct pricing was entered not long after creation of ICP but it was 15 days after.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
This is not likely to occur so long as processes are followed, they have been checked and reiterated with the ICP management team.	April 2024	

Management of “decommissioned” status		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 20 Schedule 11.1 From: 30-Mar-23 To: 02-Feb-24	Two of a sample of five ICPs checked had an incorrect decommissioning date recorded on the registry. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong to reflect the improvements made to the decommissioning process prior to completion of the audit as detailed in the excerpt below. The impact is assessed to be low as there is no impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
These were identified and corrected at time of audit.	March 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We have now clarified this process (please see excerpt below) and have embedded this change into the team.	April 2024	

Maintenance of price category codes		
Non-compliance	Description	
Audit Ref: 4.12 With: Clause 23 Schedule 11.1 From: 03-Aug-23 To: 03-Sep-23	Registry not updated at least two months prior to the start date of price code IND15U. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as price codes are normally updated as required by this clause and this code was created for one ICP which became “active” in December 2023. The impact is assessed to be low as the price code was created for one ICP only.	
Actions taken to resolve the issue	Completion date	Remedial action status
Unable to resolve this issue except that the actual implementation of the pricing code to 1 ICP occurred 5 months after the registry update.	29 Apr 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Reinforcement of Registry timing requirements as prescribed by the Code	29 Apr 2024	