

Compliance plan for WEL Network, Distributor 2023

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) & 10.6(1) From: 01-Jul-22 To: 30-Jun-23	Registry and loss factor information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement. The audit risk rating is assessed to be low as the overall number of ICPs affected and the calculated impact of data inaccuracies on reconciliation is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
WEL notes that that the number of registry updates and actions completed is great in number, but the number of variances or perceived inaccuracies is extremely low and has minimal or no impact. WEL reviews discrepancies on a daily basis but are reliant often on other parties such as retailers and livening agents in giving us correct information in a timely manner. We have evidence where we have pushed parties for information or to recheck information provided and will continue to do so.	October 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
WEL will continue to work with necessary parties to remind them of their obligations to provide information required for registry updates in a timely manner. Any recommendations provided in the audit will be taken onboard in the manner that they were intended and implemented where practical and meaningful.	October 2023	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: 7(2) of Schedule 11.1 From: 04-Apr-22 To: 04-Sep-22	One ICP made ready after trading had commenced at the 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 rated as strong as WEL have robust processes in place to manage this process. The trader's error and the living agent failing to report this electrical connection to WEL has caused this non-compliance. The audit risk rating is assessed to be low as the volume associated with this ICP missing from submission was minor and was corrected prior to the 14-month revision.	
Actions taken to resolve the issue	Completion date	Remedial action status
As noted, it was the error of other parties which has caused WEL to be non-compliant in 1 instance here out of 1837. We moved to correct the errors as soon as we were able. As noted in past audits, it is unfortunate that the audit rules dictate that we are penalized for things not directly caused by our own actions.	October 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
WEL cannot control other parties, but we will review any recommendations that may assist in this area.	October 2023	

Timeliness of provision of initial electrical connection		
Non-compliance	Description	
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Jul-22 To: 30-Jun-23	Five out of a sample of ten (of a possible 89 ICPs) had the initial electrical connection dates updated greater than ten days from the event date. 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 WEL has robust processes in place to manage the timeliness of initial electrical connection updates to the registry. The audit risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
As noted in the audit notes, the samples looked at shows that non-compliance comes as a result of late notification of livening by other parties. We have examples where we have chased livening date reports when not received weekly, and Livening agents have been strongly reminded of their obligations to provide timely livening details. As noted in past audits, it is unfortunate that the audit rules dictate that we are penalized for things not within our control.	October 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Since the site audit WEL Networks has spoken directly to WELLS I&E in regard to the reporting provided and accuracy of it. This was specifically in regard to inaccurate Initial Energization dates provided to us. They have investigated and advised us that they have taken responsibility and made internal changes. They note in their written response: <i>“After investigating I believe that it was a report that was just generated and passed to yourselves without any due diligence from our side.</i> <i>We have changed the process, and a Wells Team Member will go through each job individually to ensure that we have the correct details in the report moving forward.”</i> We have also now have an escalation point for WELLS I&E to address future concerns. This should help minimize inaccuracies going forward.	October 2023	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: clause 8 schedule 11.1</p> <p>From: 01-Jul-22</p> <p>To: 30-Jun-23</p>	<p>Four late address updates.</p> <p>Six late decommissioning status updates.</p> <p>282 late distributed generation updates.</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>Controls are rated as moderate as there is room for improvement with the updating of distributed generation updates.</p> <p>The audit risk rating is assessed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Outside of the Distributed Generation area, as noted in the audit comments, the number of genuinely late updates is extremely low when looking at the number of updates done in the audit period.</p> <p>Each year WEL gives all retailers advance notice in November, and again in December of our Xmas shutdown period (always just the two short 3 day weeks), and that requests may be delayed in this time.</p> <p>We believe it is unfortunate and unreasonable that the EA has expectations of Networks that all operations should be continued without impact over this period.</p>	October 2023	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>In the Distributed Generation, WEL acknowledges room for improvement.</p> <p>We look to follow up with installers 1 month after the planned install date and we have been exploring more efficient methods to manage and track paperwork-related delays.</p> <p>To address these challenges, we implemented from 9/08/2023, a system to automatically capture applications details, and give us visual indicators of days past the expected connection date.</p> <p>We will be improving the initial correspondence to DG applicants, stating, and emphasizing the obligations to return paperwork within the given timeframe.</p> <p>We are also looking at how we can Improve the DG team’s internal database to better track overdue paperwork and will look to monitor solar companies and create profiles based on their responses to this matter. These steps are expected to provide greater visibility, allowing us to identify and try rectify these issues more efficiently in the future.</p> <p>WEL does however note that we are still heavily reliant on installer responses in a timely manner.</p>	<p>October 2023</p>	

Notice of NSP for each ICP		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 7(1),(4) and (5) Schedule 11.1</p> <p>From: 27-Nov-22</p> <p>To: 30-Jun-23</p>	<p>One ICP with the incorrect NSP assigned.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</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 they mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor as the affected ICP's NSP is within the same balancing area; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
NSP corrected for ICP in question. Result of human error.	October 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This came as a result of human error and we cannot put in actions to 100% safeguard against this.	October 2023	

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 01-Jul-22</p> <p>To: 30-Jun-23</p>	<p>13 ICPs with insufficient address details to make them readily locatable.</p> <p>Potential impact: Low</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 they mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the number of ICPs not readily locatable is very small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Since the site audit WEL has been able to obtain GPS co-ordinates and/or address updates for all of the 13 ICPs in question so all should now be compliant.</p> <p>WEL approached traders of the 13 ICPs in question to seek additional address details but got no responses.</p> <p>A challenge faced with connections that do not have a council number yet is that while we may be able to obtain GPS co-ordinates in a Latitude/Longitude format, the Electricity Registry uses a Northing/Easting Format.</p>	October 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>WEL has updated an existing process to populate GPS co-ordinates for addresses that are just lot numbers with no recognised council numbering. These co-ordinates will be entered into our system in a Latitude/Longitude format.</p> <p>In conjunction with the above, we have also made an update to our systems that will convert these Latitude/Longitude co-ordinates into Easting/Northing co-ordinates and send through an update to the Electricity registry so the registry has the required format of co-ordinates..</p> <p>We are also exploring the possibility to have all existing ICPs in our system with Latitude/Longitude co-ordinates converted to Northing/Easting, and then updated in the Electricity Registry. This though will not be to improve compliancy as almost all will already have compliant addresses to ensure they are locatable. This is more for consistency of information we have.</p>	October 2023	

Provide information to the registry			
Non-compliance	Description		
<p>Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Jul-22 To: 30-Jun-23</p>	<p>Distributed generation details missing for three of a sample of ten ICPs checked of a possible 74 ICPs.</p> <p>Distributed generation event dates not reflective of connection date.</p> <p>All ten sampled of a possible 65 ICPs where the IECD ≠ and active date = MCD recorded with the incorrect initial electrical connection date.</p> <p>Of the remaining 17 ICPs with date mismatches two had the incorrect initial electrical connection date dates recorded.</p> <p>ICP 0000011088WECB8 had the incorrect unmetered load details recorded.</p> <p>Unmetered load (shared or standard) ICPs not created to record the load for 14 private lights resulting in an estimated under submission of 4,130 kWh per annum.</p> <p>Two LE ICPs incorrectly recorded with reconciliation type “non-dedicated”.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated 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 to be low as the overall number of ICPs affected and the calculated impact of data inaccuracies on reconciliation is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>WEL will continue to work on this area to clear outstanding issues.</p> <p>WEL is in the process of creating a specific internal policy regarding Unmetered Load.</p>		October 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Recommendations made will be considered.		October 2023	

Management of “decommissioned” status			
Non-compliance	Description		
Audit Ref: 4.11 With: Clause 20 Schedule 11.1 From: 01-Jul-22 To: 30-Jun-23	Decommission event dates incorrect for one of ten ICPs sampled. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as WEL has a robust process in place that mitigates errors to an acceptable level. The audit risk rating is low this has no material impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
One issue due to human error that was resolved.		October 2023	
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
Controls and processes are strong. Cannot guarantee that human errors will not occur.		October 2023	

Responsibility for metering information for NSP that is not a POC to the grid			
Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: Clause 10.25(1) and 10.25(3)</p> <p>From: 01-Jul-22</p> <p>To: 30-Jun-23</p>	<p>Incorrect meter expiry date recorded for HMB0111.</p> <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>Controls are rated as moderate for the updating of GXPs meter recertifications as WEL are reliant on the MEP to provide this information.</p> <p>The audit risk rating is low as the meters were certified at all times and there was no impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Date provided to WEL Networks was incorrect as noted and rectified.		October 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Date provided to WEL Networks was incorrect as noted and rectified.</p> <p>WEL Networks feels that the Breach risk rating of 2 seems too high for once instance, where incorrect information was given to us, and where impact is low.</p> <p>If the higher breach risk rating is due to controls being noted as moderate, WEL Networks would like to know what would be required and within our control to make controls strong.</p>		October 2023	

Creation of loss factors			
Non-compliance	Description		
<p>Audit Ref: 8.1 With: Clause 11.2</p> <p>From: 01-Jul-22 To: 30-Jun-23</p>	<p>Calculation of embedded network loss factors has not been undertaken to ensure that loss factors are accurate.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak as the embedded network loss factors review process does not mitigate errors to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the number of ICPs affected is small as these are on embedded networks.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Updating the Embedded Network Loss figures is currently being looked at and are planned to be updated with pricing to be released to retailers late December.		December 2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
Appropriate parties within WEL Networks have been asked to maintain these appropriately going forward.		December 2023	