

## Compliance plan for Waipa Network, DIST 2024

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1)  From: 16-May-23 To: 15-May-24	Registry information not complete and accurate in all instances. 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 rated as strong overall as processes are robust and there is good reporting in place to manage risk.  The risk rating is assessed to be low overall as the number of ICPS affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Keep checking the ARC Dashboard reporting and adding any new features that we need/have been missed.	Actions as it comes up	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
ARC Dashboard does give us the visibility of data inaccuracies, it is ensuring everyone is responsible for looking and utilising the tools we have.	01/08/2024 ongoing	

Requirement to correct errors		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clauses 11.2(2) and 10.6(2)</p> <p>From: 16-May-23</p> <p>To: 4</p>	<p>A small number of errors not corrected as soon as possible.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong overall as processes are robust and there is good reporting in place to manage risk.</p> <p>The risk rating is assessed to be low overall as the number of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date
Advised the team it is everyone's responsibility to check the dashboard daily to resolve asap.		
Preventative actions taken to ensure no further issues will occur		Completion date
ARC Dashboard reporting does provide visibility of data inaccuracies A reminder set in team calendar to check during the week.		
		Identified

<b>Participants may request distributors to create ICPs</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.2 With: Clause 11.5(3)  From: 16-May-23 To: 24-May-23	One LE ICP not created within three business days, and the delay to create was not communicated to applicant.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Weak  Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as weak as the process relied on one person. Waipa intends to review the process.  The risk rating is low as only one ICP was affected.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Will start getting the process documented so the customer team can process these.	01/01/2025	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We will communicate with the customer if we are unable to create their ICP within 3 working days.	01/08/2024	

<b>Timeliness of ICP Information to the registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.4 With: Clauses 7(2) of Schedule 11.1 From: 16-May-23 To: 15-May-24	12 ICPs not updated to “ready” prior to electricity being traded. Potential impact: Low Actual impact: Low Audit history: Four times previously Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate with room for improvement. The risk rating is low as the number of ICPs affected is small in relation to the overall number of new connections completed during the audit period.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
ARC updates the status for us automatically, when we add the EDB approval and trader acceptance.	February 2023 onwards	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Check that the ICP’s switch to ‘ready’ in ARC when we complete our steps as it happens automatically.	1/11/23	

<b>Timeliness of initial electrical connection date</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: Clause 7(2A) of schedule 11.1 From: 16-May-23 To: 15-May-24	16 initial electrical connection dates not updated within ten business days. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong overall and will mitigate risk to an acceptable level. The risk rating is low this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We have reminded the team again to liven connection once work has been completed and carried out. Current state we close a job and liven the connection in two separate places which causes the issue to arise.	1/08/24	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
It is an ARC enhancement to remind us to liven connection or close and liven in one step.	Actioned and waiting for it to be implemented	

Monitoring of "new" & "ready" statuses		
Non-compliance	Description	
Audit Ref: 3.14 With: Clauses 15 of Schedule 11.1  From: 16-May-23 To: 15-May-24	11 of the 12 ICPs at "new" or "ready" for more than 24 months not checked to confirm if required. Potential impact: Medium Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as Waipa intend to undertake these reviews regularly going forward. The risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Look at reporting in ARC dashboard ICP life cycle in ARC.	Currently already actioned.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ICP life cycle in ARC Dashboard reporting provides the information and a reminder has been set in team calendar to check regularly.	Currently already actioned.	

<b>Timeliness of registry updates</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 16-May-23</p> <p>To: 15-May-24</p>	<p>One late address update.</p> <p>One of a sample of ten backdated price updates not updated within three days of agreement with trader.</p> <p>Eight late decommissioning status updates.</p> <p>88 late distributed generation updates.</p> <p>11 late NSP changes.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Medium</b>	<p>Controls are rated as strong as ARC has robust controls to mitigate risk to an acceptable level. The incorrect NSP issue is an historic issue and all ICPs will be correctly recorded going forward.</p> <p>The risk rating is medium as the incorrect NSP and therefore incorrect balancing area has had a direct impact on reconciliation accuracy for the affected ICPs.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Reminder has been sent to the team to check the dashboard on a regular occurrence.		Currently actioned	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
ARC ICP management system provides additional checks and reporting to help minimise late notifications within our control. Reminder also in our team calendar and in the future, we will share the ARC Dashboard on the TV screens above us which will aid as another preventative measure.		Currently already actioned, TV screen we are waiting on.	

<b>Notice of NSP for each ICP</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.2 With: Clause 7(1),(4) & (5) Schedule 11.1 From: 20-Oct-22 To: 15-Mar-24	11 ICPs mapped to wrong NSP and balancing area. Potential impact: Medium Actual impact: Medium Audit history: Once previously Controls: Moderate Breach risk rating: 4	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Medium</b>	Controls are rated as moderate as NSP changes still require development in ARC to automate these updates to the registry. The risk rating is medium as the incorrect NSP and therefore incorrect balancing area has had a direct impact on reconciliation accuracy for the affected ICPs.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The wider team have been advised about changes made on the network need to be communicated with the customer team when NSP's change. We will then send an email with the relevant information to traders.	Currently actioned	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Adding a note in SCADA system to alert engineers to advise us of NSP's being changed.	Currently actioned	



ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1  From: 16-May-23 To: 15-May-24	Approximately 520 ICPs with addresses that are not readily locatable. 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 rated as strong as the controls in ARC will mitigate risk to an acceptable level.  The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
We are still completing desk-based work to update addresses where we can and sending field staff to site when we have the resource.		
Preventative actions taken to ensure no further issues will occur		Completion date
ARC ICP management won't allow us to create duplicate addresses and makes all the required registry address fields compulsory which means incomplete addresses should be minimised		Currently already actioned.
		Investigating

<b>Distributor to provide ICP information</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 16-May-23</p> <p>To: 15-May-24</p>	<p>Two LE ICPs incorrectly recorded as “not dedicated”.</p> <p>Two LE ICPs with an incorrect initial electrical connection date recorded.</p> <p>Chargeable capacity incorrectly recorded on the registry when it is being derived from the retailer billing files.</p> <p>Three ICPs with an incorrect initial electrical connection date populated.</p> <p>One ICP with distributed generation recorded but an installation type of “L”</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are rated as strong overall as controls will mitigate risk to an acceptable level.</p> <p>The risk rating is assessed to be low as data accuracy overall is high.</p>	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
Monitoring of the high-risk database as well as checking the report EIEP1 & 3 to pick up any discrepancies.		Actioned and ongoing
		Investigating

<b>Management of “decommissioned” status</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.11 With: Clause 20 Schedule 11.1  From: 16-May-23 To: 15-May-24	One “decommissioned” ICP not recorded as “decommissioned”. Four of a sample of five ICPs recorded with the incorrect decommission date. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong as the team has a good understanding of event date requirements. The risk rating is assessed to be low this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Communicated with the team it is better to put accurate data and fail audit requirements. Team has been educated on how to enter the data and how to get around the date issue in the registry.	Currently actioned	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Going forward we know how to get around the date issue in the registry and will continue to ensure we put the correct dates moving forward.	Currently actioned & ongoing	