

## Compliance plan for Vector Limited, DIST 2024

Requirements to provide complete and accurate information			
Non-compliance	Description		
<p>Audit Ref: 2.1 With: 11.2(1) &amp; 10.6(1)</p> <p>From: 12-Jul-23 To: 05-Jun-24</p>	<p>Examples of incorrect or missing information found in <b>sections 3.3, 4.2, 4.4, 4.6</b> and <b>4.10</b>.</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		
<b>Low</b>	<p>The controls are rated as moderate as whilst there are good processes in place for identifying inaccurate and missing information, corrections are not always made in a timely manner.</p> <p>The audit risk rating is low but has the potential to be medium due to the estimated volume of ICPs with initial electrical dates missing as this prevents the traders from confirming that the correct first "active" date has been recorded. The incorrect NSP allocation also has a direct impact on the accuracy of ICP days which is used to scale for traders.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Missing IECD: Refer to audit reference 3.3</p> <p>Distributed Generation: Continue monthly follow up with customers for missing COCs.</p> <p>NSP flag: Further training to be provided to team around correct NSP flags when changes are made to an ICP.</p> <p>The connections team will fix ICP's in this sample. We will continue to use the audit compliance report to pick up missing data.</p>		9/12/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No comments provided			

<b>Requirement to correct errors</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.2 With: 11.2(2) and 10.6(2)  From: 12-Jul-23 To: 05-Jun-24	Errors were not always corrected as soon as practicable. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate as whilst there are good processes in place for identifying inaccurate and missing information, corrections are not always made in a timely manner. The audit risk rating is low but has the potential to be medium due to the estimated volume of ICPs with initial electrical dates missing as this prevents the traders from confirming that the correct first "active" date has been recorded. The incorrect NSP allocation also has a direct impact on the accuracy of ICP days which is used to scale for traders.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
N/A		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Training of NOTfiles scheduled to commence on the week 21/11/2024. This will identify failed Gentrack to registry updates and how to fix errors within a timely manner.	31/11/2024	

<b>Participants may request distributors to create ICPs</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.2 With: Clause 11.7  From: 12-Jul-23 To: 05-Jun-24	Four LE ICPs of 22 LE ICPs not created within three days of all required information being provided.  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 processes are robust to mitigate risk to an acceptable level.  The audit risk rating is low as the number of LE ICPs not created within three business days was small.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Create an internal LE register to record all LE ICP requests and its progress.  This register will be an active tool assigned to a connections team member weekly. We will be able to have visibility of all LE ICP requests that require more information or pending third party contribution/information.		30/11/2024
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
N/A		
<b>Remedial action status</b>		
Identified		

Provision of ICP information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7  From: 12-Jul-23 To: 05-Jun-24	548 ICPs became “active” during the audit period but had no initial electrical connection date populated.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as there is room to take a targeted approach to get this information from the warranted persons.  The audit risk rating is low as this information is not used directly in reconciliation but is important to confirm that ICPs are made “active” from the correct date.		
Actions taken to resolve the issue		Completion date	Remedial action status
As recommended, we will conduct an analysis of the ICP’s with no IECD will identify its respective warranted person. We will collaborate closely with the warranted persons to obtain missing IECD’s.  First, we will fix the ICP’s listed in the sample from this audit. Last week of October 2024 and first week of November 2024 has been set aside for this analysis, following up on initial contact made to warranted persons during the audit.  We will continue to use the audit compliance report to work with warranted persons to pick up missing data.		30/11/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
N/A			

<b>Timeliness of Provision of ICP Information to the registry manager</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of schedule 11.1</p> <p>From: 12-Jul-23</p> <p>To: 05-Jun-24</p>	<p>18 ICPs were made “ready” after electrical connection, and therefore trading, had occurred.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Four times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are recorded as moderate as they will mitigate risk but there is room for improvement.</p> <p>The audit risk rating is assessed to be low but has the potential to be medium as this has a direct impact on reconciliation as the trader cannot make the ICPs “active” and the majority of these sites are meter category 2 or higher with large consumption.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>An internal ‘CT purpose’ register will be created end of October 2024. Like LE ICP’s register this register will record all ICP requests created in NU status and issued for CT purposes.</p> <p>The connections team will be able to have visibility of all the requests. Progress and response from projects team can be tracked weekly through the team daily stand-up meetings.</p>		31/10/2024	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
<p>Once the register has been created training will be provided to the team on how to use this tool effectively to capture supply install dates so status of the ICP can be changed to ready prior to connection being made at retailer’s end.</p>		31/10/2024	

<b>Timeliness of Provision of Initial Electrical Connection Date</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 3.5 With: 7(2A) of schedule 11.1</p> <p>From: 12-Jul-23 To: 05-Jun-24</p>	<p>22 of a sample of 30 ICPs checked of a possible 3,587 ICPs that did not have initial electrical connection dates populated within ten business days of being electrically connected.</p> <p>Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are moderate as controls will mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is low but has the potential to be medium due to the estimated volume of ICPs with these dates missing. This prevents the traders from confirming that the correct first "active" date has been recorded.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Please refer to audit reference: 3.3	30/11/2024	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17  From: 12-Jul-23 To: 05-Jun-24	18 ICPs were connected prior to the ICP being made "ready" and therefore the trader accepting responsibility in the registry.  Potential impact: Low  Actual impact: Low  Audit history: Twice previously  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate as they will mitigate risk but there is room for improvement.  The audit risk rating is assessed to be low but has the potential to be medium as this has a direct impact on reconciliation as the trader cannot make the ICPs "active" and the majority of these sites are meter category 2 or higher with large consumption.	
Actions taken to resolve the issue	Completion date	Remedial action status
Please refer to audit reference 3.4	31/10/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<b>Monitoring of “new” &amp; “ready” statuses</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 3.14</p> <p>With: Clause 15 of schedule 11.1</p> <p>From: 12-Jul-23</p> <p>To: 05-Jun-24</p>	<p>ICPs at “ready” for more than 24 months not being confirmed with the trader as still required.</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>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are recorded as moderate as the process in place will mitigate risk, but due to resource constraints these are not being worked consistently.</p> <p>The audit risk rating is assessed to be low but has the potential to be medium as the volume of aged ICPs not managed increases the risk of ICPs being electrically connected ICPs but not identified.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>The compliance report is still being used to identify unclaimed ICP’s by traders.</p> <p>Week starting 11/11/2024 has been allocated to ensure all compliance reports for ready ICP’s are compiled and followed up with traders.</p> <p>Checks will be conducted internally (mailboxes) to ensure we cover any missed communication from traders in reference to these ICP’s.</p>		30/11/2024	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	



Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: clause 8 of schedule 11.1</p> <p>From: 12-Jul-23</p> <p>To: 05-Jun-24</p>	<p>71 late address updates.</p> <p>286 late updates to decommissioned status.</p> <p>451 late other network updates.</p> <p>1,495 late distributed generation updates.</p> <p>1,428 late NSP changes.</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		
<b>Low</b>	<p>The controls are rated as moderate as the checks in place will mitigate risk most of the time but there is room for improvement.</p> <p>There is a potential minor impact on settlement, hence the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Decommission: please refer to audit reference 2.2</p> <p>Distributed Generation: Report of missing COC report collated monthly to follow up with requestors for COC.</p> <p>Network Event Dates: please refer to audit reference 3.3</p>		31/12/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<b>Notice of NSP for each ICP</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 4.2</p> <p>With: Clause 7(1)(b) of schedule 11.1</p> <p>From: 12-Jul-23</p> <p>To: 05-Jun-24</p>	<p>32 of the 50 ICPs sampled mapped to the incorrect NSP.</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>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are rated as moderate as the checks in place will mitigate risk most of the time but there is room for improvement management of NSP changes.</p> <p>The risk rating is low as the number of ICPs affected is expected to be small overall, but I note that this does have a direct impact on the accuracy of ICP days used for scaling in the reconciliation processes.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>Approximately 600 ICPs that were loaded onto the old "Pending" Platforms are now showing in Vector's systems as correct, however they are not showing in the Electricity Authority Registry with the correct NSP due to database "stacking".</p> <p>These ICPs (approximately 600) have been identified and they will need to be remediated directly into and via the Electricity Authority online application.</p>		Jun 2025	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
<p>The Registry Audit Comparison for NSP Discrepancies continues to be run monthly and this is regularly reviewed and ICP's are remediated in the source systems, where required.</p> <p>A report continues to be run weekly to identify ICPs located more than 1km away from their expected ICP Premise Address location. This report is regularly reviewed and ICP's are remediated in the source systems, where required.</p>		<p>Ongoing</p> <p>Ongoing</p>	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 of schedule 11.1 From: 12-Jul-23 To: 05-Jun-24	1,495 ICPs with addresses that are not readily locatable or are duplicates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as whilst the process for new connections is robust, there are still a high number of historic addresses to be confirmed. The risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
This is an ongoing piece of work. Vector continues to work on trying to identify and correct these historical address issues and are requesting help from the traders to resolve these. Vector will follow up with traders of the ten listed addresses above over the next three-four months.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

<b>Distributors to provide ICP Information to the registry manager</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 4.6 With: Clause 7(1) of schedule 11.1</p> <p>From: 12-Jul-23 To: 05-Jun-24</p>	<p>15 of a sample of 47 ICPs of a possible 214 ICPs with the incorrect initial electrical connection date recorded.</p> <p>Three of a sample of 20 of a possible 75 ICPs with initial electrical connection dates populated in error.</p> <p>15,942 ICPs had missing initial electrical connection dates.</p> <p>15 of a sample of 20 ICPs of a possible 670 ICPs with distributed generation details not populated.</p> <p>Six ICPs with distributed generation details recorded but an installation type of "L".</p> <p>ICP 0800537068LC12B recorded with an installation type of "B" but generation volume of zero.</p> <p>One ICP of a sample of 20 of a possible 193 ICPs where Vector has distributed generation details incorrectly recorded.</p> <p>One "GN" ICP with an incorrect NSP dedication flag of "Y".</p> <p>Six LE ICPs with the incorrect NSP dedication flag of "N".</p> <p>One ICP with an incorrect reconciliation code of "EN"</p> <p>19 of a sample of 30 ICPs with backdated NSP changes were still recorded against the incorrect NSP due to the event start date selected.</p> <p>Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls are rated as moderate as there is room for improvement.</p> <p>The audit risk rating is low but has the potential to be medium due to the estimated volume of ICPs with initial electrical dates missing as this prevents the traders from confirming that the correct first "active" date has been recorded.</p> <p>The incorrect NSP allocation also has a direct impact on the accuracy of ICP days which is used to scale for traders.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>IECD: Refer to audit reference 3.3</p> <p>Distributed Generation: Refer to audit reference 2.1</p> <p>NSP Dedication Flags: Provide further training to team to check the correct NSP flag for each ICP particularly when changes are made to an ICP.</p>		09/12/2024	Identified

<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Compliance report will be processed monthly which will outline any additional discrepancies.		

<b>Provision of information to registry after the trading of electricity at the ICP commence</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.7 With: Clause 7(3) of schedule 11.1  From: 11-Apr-24 To: 02-May-24	Price category code was updated 14 business days after trading commenced for one ICP. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as strong as Vector has updated the price code prior to trading for all but one ICP.  The audit risk rating is recorded as low as only one ICP was affected.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The business continues to chase timely paperwork from FSPs		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Once the site is confirmed as livened on the registry the Billing Team will pick up these incidences in the billing run should the paperwork have not been supplied.		

GPS coordinates		
Non-compliance	Description	
Audit Ref: 4.8 With: Clauses 7(8) and (9) of schedule 11.1 From: 12-Jul-23 To: 05-Jun-24	256 ICPs with the incorrect GPS co-ordinates recorded in the registry. Potential impact: Low Actual impact: None Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as the new connection process is robust. 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
The 256 ICP's GPS co-ordinates will be checked and verified before the bulk upload via Gentrack through to registry will take place.	January 2025	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Management of "ready" status		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 14 of Schedule 11.1 From: 12-Jul-23 To: 05-Jun-24	Five ICPs at "ready" with no proposed trader recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as they will mitigate risk to an acceptable level. The audit risk rating is assessed to be low as only a very small number of ICPs were affected.	
Actions taken to resolve the issue		Completion date
Please refer to audit reference 2.2		
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified