

Compliance Plan 2021

PowerNet

Non-compliance	Description		
Audit Ref: 2.1 With: <i>Clause 11.2(1) and 10.6(1)</i> From: 01-Jul-20 To: 10-Jul-21	A relatively small quantity of information in the Registry was inaccurate, they were spread broadly across all PowerNet Distribution Networks ELIN, TPCO, LLNW, OTPO. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, since the new ICP management implemented during the previous audit period, some improvement has been demonstrated this audit period. The audit Risk Rating is assigned as low due to the relatively low number of ICPs involved.		
Actions taken to resolve the issue		Completion date	Remedial action status
All data inaccuracies are corrected as they are discovered		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
In general errors are unknown until they are highlighted. At that point corrective action is taken		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.5 With: <i>Clause 7(2A) of Schedule 11.1</i></p> <p>From: 01-Jul-20 To: 10-Jul-21</p>	<p>TPCO - 1.55% of IECD input to Registry late ELIN - 3.13% of IECD input to Registry late OTPO - 10% of IECD input to Registry late LLNW – 0.47% of IECD input to Registry late</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. Evidence shows the new ICP connection management system and processes implemented have demonstrated improved results they are inconsistent across networks. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Daily monitoring of PowerNet Connect dashboard identifies ICPs which have become Active, but no IECD has been loaded. This prompts updating of Registry and investigation into missing information from the field.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Investigating occurrences as outlined above leads to education and reinforcement with field operators on requirements to return documentation.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.1 With:</p> <p><i>Clause 8 Schedule 11.1</i></p> <p>From: 01-Jul-20 To: 10-Jul-20</p>	<p>Registry information not updated within 3 business days by all PowerNet Distribution Networks ELIN, TPCO, LLNW, OTPO</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 recorded as moderate, the new ICP management system appears to be operating as expected although appears inconsistent across networks. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>At last audit it was found PowerNet Connect was behaving in a way that led operators to unnecessarily backdate updates by presenting them with a default of the last used Event Date. The software was modified to default to present date which is appropriate for most routine updates. The reports show these backdates ceased after this had been implemented.</p>		Dec 20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As has been mentioned in the Audit commentary, a bulk address data cleansing exercise inadvertently, and wrongly, applied an historic Event Date to many data corrections. This was a one-off situation, and the error has been noted, no recurrence is expected.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.4 With:</p> <p><i>Clause 2 Schedule 11.1</i></p> <p>From: 01-Jul-20 To: 10-Jul-21</p>	<p>A number of duplicate addresses created as an unintended consequence of address data cleansing. Across all PowerNet Distribution Networks ELIN, TPCO, LLNW, OTPO.</p> <p>All networks</p> <p>Potential impact: Low</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. The reason for this non-compliance is recognised and remedial action is being implemented. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All duplicate addresses will be reviewed, and appropriate corrective action taken.		By next audit	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Any future bulk changes of data will involve extra vigilance to ensure new issues are being created.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.6 With:</p> <p><i>Clause 7(1)</i> <i>Schedule 11.1</i></p> <p>From: 01-Jul-20 To: 10-Jul-21</p>	<p>Incorrect Installation type in the Registry for TPCO (x4), OTPO (x3) Missing Distributed Generation information type in the Registry capacity and fuel type for TPCO (x4), OTPO (x3)</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls are recorded as moderate because new system appears to be operating as anticipated. Further compliance improvement should be expected as system knowledge develops. The audit Risk Rating is assigned as low due to a small number of ICPs with minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Work has begun to correct identified errors.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Work is ongoing correcting data anomalies which exist. All tools available are used to assist identify areas for attention.		Ongoing	