

Compliance plan for Unison Distributor – 2021

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2(1) and 10.6(1)</p> <p>From: 01-Feb-20</p> <p>To: 06-Sep-21</p>	<p>Not all practicable steps are taken to ensure that the information provided is complete and accurate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The registry discrepancies processes are robust, and the number of discrepancies was low.</p> <p>The inaccurate information has a small impact on other participants and on settlement, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The four remaining ICP's showing on incorrect GXP's have now been corrected in the Registry		20/10/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will work with our IT team to identify whether there are further automated controls that can be put in place.		To be determined based on complexity of any solution.	

Non-compliance	Description		
<p>Audit Ref: 2.3</p> <p>With: Clause 48(1A) and 48(1B) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 06-Oct-21</p>	<p>Seal information is not recorded and is not traceable to the person fitting the seal.</p> <p>MEPs are not notified when seals are broken.</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>The controls are recorded as moderate because control devices are sealed, and notification is provided to the MEP via the trader. Minor process modifications will ensure compliance.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Not Applicable		Not Applicable	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are aware of the new requirements and will implement necessary education for faults staff on these regulations.		Within the next two months.	

Provision of information on dispute resolution scheme		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11.30A From: 01-Apr-21 To: 05-Oct-21	Utilities Disputes information not provided during phone calls. 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 at the time the audit was finalised, because Unison had specific plans in place to resolve this at the time of the audit. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The IVR is now in place		4/11/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Not applicable		Not applicable
		Cleared

Participants may request distributors to create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 11.5(3) From: 11-Mar-20 To: 11-Sep-20	Two ICPs not created within three business days and notification not provided to the participant. 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; these two notifications appear to be one-off issues and it's also possible the notifications were sent but merely cannot be located. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Not applicable		Not applicable
Preventative actions taken to ensure no further issues will occur		Completion date
Being more vigilant with correspondence from Retailers and Electricians to prevent time breaches. Better recording of notifications.		Ongoing. Review 2022 audit.
		Identified

Timeliness of Provision of ICP Information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Jan-20</p> <p>To: 05-Feb-20</p>	<p>Registry not updated prior to commencement of trading for two ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because most registry updates occurred on time.</p> <p>The audit risk rating is low because the status changes occurred as soon as Unison became aware of the issues.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We will request a reminder to our authorised contractors at their next review to ensure they are only living as per the authorisation that has been given by us.		Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 01-Feb-20</p> <p>To: 06-Sep-21</p>	<p>Late population of the initial electrical connection date for 80 ICPs (4%).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong. Improvements were made during the audit period and the percentage compliance has improved to 96%.</p> <p>The potential impact is low, of the 80 late updates, 11 were updated later than 20 business days of the initial electrical connection date.</p>	
Actions taken to resolve the issue		Completion date
We obviously need to reinforce with the livening agents the importance of providing the appropriate paperwork in a timely fashion.		Normally within the next two months (Covid restrictions may apply)
Preventative actions taken to ensure no further issues will occur		Completion date
As above		As above
		Remedial action status
		Identified

Connection of ICP that is not an NSP			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 01-Jan-20</p> <p>To: 05-Feb-20</p>	<p>One ICP connected prior to proposed trader being recorded in the registry.</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>Controls are rated as strong because connection occurred without Unison's knowledge for this ICP because the incorrect ICP was connected.</p> <p>The audit risk rating is low because registry updates occurred as soon as Unison became aware of the issues.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Same situation as Clause 3.4 "We will request a reminder to our authorised contractors at their next review to ensure they are only livening as per the authorisation that has been given by us."		Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

Connection of ICP that is not an NSP			
Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: Clause 10.31</p> <p>From: 01-Jan-20</p> <p>To: 05-Feb-20</p>	<p>One ICP connected without a request from a trader.</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>Controls are rated as strong because connection occurred without Unison's knowledge for this ICP because the incorrect ICP was connected.</p> <p>The audit risk rating is low because registry updates occurred as soon as Unison became aware of the issues.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Same comments as per Clause 3.4 "We will request a reminder to our authorised contractors at their next review to ensure they are only livening as per the authorisation that has been given by us."		Normally within the next two months (Covid restrictions may apply)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Feb-20 To: 06-Sep-21	Some price, network, status, and address changes were updated more than three business days after the event date. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unison requested a change to the Code regarding the 3 day notification period for Pricing Events several years ago but clearly nothing has happened in this regard. Many of the late changes are requested by the retailer and we have agreed to make the changes.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		N/A	

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 01-Feb-20 To: 06-Sep-21	10 ICPs with an incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate rather than strong because there is a system issue needing resolution to ensure NSPs are correct. The audit risk rating is low as only 10 ICPs were found to be mis-mapped and none were in the incorrect balancing areas.	
Actions taken to resolve the issue		Completion date
All the incorrect entries have now been corrected		20/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
We will continue to work with our IT department to resolve issues going forward.		N/A
		Identified