

Compliance plan for Alpine Energy Ltd

Title: Requirement to provide complete and accurate information	
Non-compliance	Description
<p>Audit Ref: 2.1</p> <p>With: Clauses 11.2(1) and 10.6(1)</p> <p>From: 06-Feb-19</p> <p>To: 10-Oct-19</p>	<p>ICP 0004610016AL6ED had a backdated update to remove unmetered load details of "Weighbridge - lights only", but should have been updated to reflect that standard unmetered load was connected for a light and power outlet, which are very rarely used.</p> <p>ICPs 0004282423ALD60, 0009800107ALA72, and 0004610016AL6ED have incorrect initial electrical connection dates populated.</p> <p>ICP 0001890253AL261 has a status reason code of 2 (Installation Dismantled) applied but should have had 1 (Setup in error) applied.</p> <p>ICP 0002252075ALB2E has been decommissioned, but has a status of ready for decommissioning recorded on the registry.</p> <p>Eight network updates had incorrect event dates recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are rated as moderate. A small number of incorrect event dates were recorded due to data processing errors, and unmetered load was incorrectly removed for one ICP.</p> <p>The audit risk rating is low.</p> <ul style="list-style-type: none"> The unmetered load associated with 0004610016AL6ED is expected to be very low. The correct status code was applied for 0001890253AL261, only the status reason was incorrect. ICP 0002252075ALB2E was inactive and had physically been decommissioned. The incorrect initial electrical connection dates and event dates have no direct impact on reconciliation. The incorrect event date for 0006664556AL006's NSP change has no impact on reconciliation because the NSPs are within the same balancing area. The incorrect event date for 0007243868AL3C6 has a minor impact on reconciliation because the NSPs were not within the same balancing area, but the load for the ICP (a public toilet) is expected to be low.

Actions taken to resolve the issue	Completion date	Remedial action status
I have requested that our GIS team create a ICP mapping line trace to compare to the ICP database info and compare any discrepancies	WIP	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
It's hard to remove all errors when the data entry is a manual entry, however a higher awareness to possible errors as well as periodic testing will ensure a vast improvement.	1/6/20	

Title: 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: 27-May-19</p> <p>To: 18-Jun-19</p>	<p>16 ICPs which became active during the audit period had late initial electrical connection date updates.</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	
Low	<p>The controls are recorded as strong, in most cases the dates were delayed while Alpine Energy was waiting for confirmation of the correct date.</p> <p>Most initial electrical connection dates were populated on time. The impact on participants is minor because this field is used to validate other fields against.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Currently the system is very paper based and we are always aware that once a FSP takes paperwork away that its then up to them to complete the task, paperwork and return the information. We have scoped an electronic process scoped which has just had its budget approved to proceed	hopefully early to mid 2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implement electronic application system	hopefully early to mid 2020	

Title: Temporary electrical connection of ICP that is not an NSP			
Non-compliance	Description		
Audit Ref: 3.8 With: Clause 10.31A From: 01-Dec-18 To: 30-Oct-19	Temporary electrical connection conducted by Alpine Energy for a purpose other than testing metering. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong, because the intention of this process is to ensure safety and customer experience outcomes are met. There is only a positive impact on other parties; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Alpine considers the current method legal under the Electricity Act 1992 section 82 (4) which the Act is high ranking than the code, however this method is still not Alpine's preferred choice of livening we would prefer one person complete the whole inspect meter install and liven task			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The contract for the field service work completed by Wells finishes in January and Delta take over. They plan to use NETcon staff for this work, which will allow it to be all completed by the one person inspect, meter install and liven		January 2020 (maybe 1/2/20)	

Title: Changes to registry information	
Non-compliance	Description
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 07-Dec-18 To: 22-Aug-19	13 late address updates. 53 late network updates. 27 late pricing updates. Three late status updates. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate. Most of the late updates were corrections, or were delayed while Alpine Energy confirmed that the updates were required.</p> <p>There may be a minor impact on other participants. Processing corrections improves compliance with the completeness and accuracy requirements.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
I feel being perfect in this area is complicated we are dealing with a lot of historical data and paperwork that's out of our control. We do plan to go to a mobile platform that will assist with data accuracy and timeliness of information following completion of projects. No doubt this will also add to other issues for us to sort as well		2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We can really only do our best and to always consider compliance as an area for why we need to do things timely and correct		WIP	

Title: Notice of NSP for each ICP			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clause 7(1),(4) and (5) Schedule 11.1</p> <p>From: 30-Aug-19</p> <p>To: 30-Oct-19</p>	<p>Two ICPs temporarily had an incorrect NSP recorded.</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		
Low	<p>Controls are rated as moderate as the process will mitigate errors most of the time.</p> <p>The volume of potentially mis-mapped ICPs is low therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
I have requested that our GIS team create a ICP mapping line trace to compare to the ICP database info and compare any discrepancies. We have amended the 2 x ICPs we had incorrect		22/11/19	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
I have requested that our GIS team create a ICP mapping line trace to compare to the ICP database info and compare any discrepancies		WIP	

Title: Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(o)&(p) Schedule 11.1</p> <p>From: 30-Aug-19</p> <p>To: 30-Oct-19</p>	<p>One ICP temporarily had an incorrect dedicated NSP status, and was corrected during the audit.</p> <p>ICPs 0004282423ALD60, 0009800107ALA72, and 0004610016AL6ED have incorrect initial electrical connection dates populated.</p> <p>One ICP temporarily had incorrect distributed generation details due to late receipt of inspection paperwork and was corrected during the audit.</p> <p>One ICP temporarily had an incorrect installation type and was corrected during the audit.</p> <p>Four ICPs temporarily had incorrect distributor unmetered load details and were corrected during the audit.</p> <p>ICP 0004610016AL6ED had a backdated update to remove unmetered load details of "Weighbridge - lights only", but should have been updated to reflect that standard unmetered load was connected for a light and power outlet, which are very rarely used.</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, because the automated registry update process and validation processes are adequate to ensure that most information is accurate.</p> <p>The audit risk rating is low, as most of this information does not have a direct impact on reconciliation. The unmetered load associated with 0004610016AL6ED is expected to be very low.</p>	
Actions taken to resolve the issue		Completion date
We will plan to use more notification files in 2020 and upskill staff to improve things		2020
Preventative actions taken to ensure no further issues will occur		Completion date
Just work on what we have already to add additional processes		2020
		Identified

Title: Management of “decommissioned” status			
Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: Clause 20 Schedule 11.1</p> <p>From: 12-Sep-17</p> <p>To: 30-Oct-19</p>	<p>ICP 0001890253AL261 has a status reason code of 2 (Installation Dismantled) applied but should have had 1 (Setup in error) applied.</p> <p>ICP 0002252075ALB2E has been decommissioned, but has a status of ready for decommissioning recorded on 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>There are monitoring controls over decommissioning, including checks that paperwork is returned and identification of ICPs moved to ready for decommissioning status. One exception occurred very early in the audit period, and the other occurred prior to the audit period. It is unlikely these errors would occur for ICPs decommissioned now.</p> <p>The impact is low. The correct status code was applied for 0001890253AL261, only the status reason was incorrect. ICP 0002252075ALB2E was inactive and had physically been decommissioned.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Again I think the additional reporting and knowledge in this area will tidy a lot of these smaller ones up		mid 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Registry training and registry reporting of files		early 2020	

Title: Creation of loss factors	
Non-compliance	Description
<p>Audit Ref: 8.1</p> <p>With: Clause 11.2</p> <p>From: 01-Dec-18</p> <p>To: 30-Oct-19</p>	<p>Loss factors are not accurate in relation to reconciliation losses.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>

Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate because a compliant loss factor review is well underway and expected to be completed in the next three months.</p> <p>UFE is allocated to participants; therefore there is no adverse impact on settlement; however traders may use published losses in pricing decisions, therefore the use of inaccurate loss factors could lead to incorrect pricing, which is considered to have a medium impact.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are well under way with the loss factor review and we will have it in place for 2020. With it fully documented a Breach risk rating of 4 is rather harsh as it was identified and progressed very well		1/1/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once we have the tools to complete the assessment we can then periodically review then as required		Ongoing	