

Compliance plan for Electra 2019

Non-compliance	Description		
Audit Ref: 1.12 With: 2 of Schedule 11.1 From: 01-Nov-18 To: 30-Apr-19	Material change audit not conducted Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating:5		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as none. Minor impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 01-May-18 To: 30-Apr-19	Some information in the registry still must be corrected or 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		
Low	We recorded controls as moderate. The level of compliance has decreased since the last audit. Audit risk rating is assessed as low because of the small number of ICPs effected. Minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
		ongoing	

Non-compliance	Description		
Audit Ref: 2.2 With: 11.2(2) From: 01-May-18 To: 30-Apr-19	Incorrect data is corrected but, in some cases, it is identified late and results in backdating transactions in the registry 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	Controls are recorded as moderate because some processes are not fully developed. The electronic interface to the registry improved the quality of data. Audit risk rating is recorded as low because there is a minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-May-18</p> <p>To: 30-Apr-19</p>	<p>Initial Electrical Connection Date is not recorded for 51.8% new ICPs, some dates are incorrect.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as weak. There are no good controls in place to monitor if information was recorded in the registry and the correctness of data. Impact on settlement outcomes is minor therefore audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Retailers have been emailed requesting the livening agents for connections. To date only 1 has responded. Further requests to the retailers will be made.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monthly audits of active ICPs will be undertaken to determine all IED information has been received. On discovery of incomplete information follow-up with the retailer to determine the livening agent, then pursuit of the livening agent for information will be undertaken.		ongoing	

Non-compliance	Description		
Audit Ref: 3.13 With: 13 of Schedule 11.1 From: 01-Aug-18 To: 30-Apr-19	Incorrect application of “new” status Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as weak. There is no robust process to monitor ICPs status. Electra relies on traders to notify them when an ICP has an incorrect status. Impact on settlement outcomes is minor because of the small number of ICPs therefore audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
ICPs changed from New to ready			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional logic was added to the DC-010 file generation script to ensure proposed trader was not removed from future updates.		Feb 2019	

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-May-18 To: 30-Apr-19	Some updates to network and pricing information were done later than 3BD Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate; a more detective controls needs to be designed. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to work on updating price information within 3BD from request of retailer.			

Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: 7(4) of Schedule 11.1</p> <p>From: 01-May-18</p> <p>To: 30-Apr-19</p>	<p>12 ICPs had incorrect NSP assigned</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: None</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as weak. There is no follow up process to check this. Electra has only two NSPs which are not interconnected. Audit risk rating recorded as low because all errors were corrected. No impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Incorrect ICP's were identified and corrected.		23/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A script will be run manually every month to identify any ICP linked to the incorrect NSP. The script is written and was used to extract the information about the ICP's which were corrected		23/5/2019	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 01-May-18</p> <p>To: 30-Apr-19</p>	<p>For 510 ICPs the address descriptions do not allow ICPs to be readily located</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating:3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak, the addresses are corrected as an operator comes across them, but it is not a structured project. No impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Work was undertaken throughout the year to address the issue of hard to locate ICPs. The remaining ICPs will require a site visit to determine the exact location.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
More work to be completed to determine locations, and more monitoring of ready for decommissioning ICPs to be undertaken.			

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1)(m)(o)(p) of Schedule 11.1</p> <p>From: 01-May-18</p> <p>To: 30-Apr-19</p>	<p>Incorrect or missing information in the registry for UML, Initial Electrical Connection Date, NSPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating:3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak. The same non-compliance was identified multiple times. The number of ICPs with no IECD and EG recorded has increased since the last audit. Minor impact on settlement outcomes. Audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Import/Export meter installations are being compared to our approved installations and retailers/installers being emailed for confirmation of installation. Once this I received the correct date can be populated for installation of the DG.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>More regular monitoring of the metering file to determine if Import/Export meters have been installed.</p>			

Non-compliance	Description		
Audit Ref: 4.11 With: 20 of Schedule 11.1 From: 01-May-18 To: 30-Apr-19	For some ICPs the date of decommissioning is incorrect Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak, it needs to be re-engineered. No impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
More monitoring of ICP status to determine and action sooner 'ready to decommission' ICPs. As Electra do not make the physical disconnection this can cause some problems getting confirmation of the physical disconnection from the retailer.			