

Compliance plan for Alpine – 2018

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 01-Dec-17 To: 28-Nov-18	Information on the registry not complete and accurate Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls have been strengthened during the audit period and are now considered to be strong. The audit risk rating is low as the errors have no direct impact on reconciliation	
Actions taken to resolve the issue		Completion date
The DG with information was a result of the process not working and was picked up in our 2017 audit which a still outstanding by parties other than Alpine. These are being monitored and will be resolved/completed. Also to note is one DG had been removed from the house but we hadn't been informed until the retailer queried us about it. (something we and others need to be aware of with some of the solar companies and the contracts they are offering make homeowners take it with them when they shift houses)		Prior to 2019 Audit
Preventative actions taken to ensure no further issues will occur		Completion date
Processes changes have occurred so now and in the future this won't result		Already completed
		Identified

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 12-Dec-17 To: 28-Mar-18	Late updating of the initial electrical connection date for two ICPs Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level and they have been improved to include an extra validation step. The impact on and participants is minor because this field is used to validate other fields against; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We have reviewed our system from earlier in the year and have added in checks from the notification tool to assist with monitoring		Has Started
Preventative actions taken to ensure no further issues will occur		Completion date
Continue with daily checks and being verified by a the registry coordinator		Has started

Temporary electrical connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 10.31A</p> <p>From: 01-Jan-18</p> <p>To: 28-Nov-18</p>	<p>Temporary electrical connection conducted by Alpine for a purpose other than testing metering.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>The controls are recorded as strong, because the intention of this process is to ensure safety and customer experience outcomes are met.</p> <p>There is only a positive impact on other parties; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
We used the ESR and the Act which allows our process to be compliant. It was all to ensure a complete inspection by the AEL living agent, we will look to the EA for advice on this, as well as review other Networks to consider the inspection/metering/livening process. We also had an email from the EA, which is inserted below this table.		Jan/Feb
Preventative actions taken to ensure no further issues will occur		Completion date
Will be an outcome of the review, no hasty decision can be made that misses out safety just to comply		2019
		Further information was provided after the audit, including an extract from the Act which allows the adopted practice. I have inserted this below.

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 01-Dec-17 To: 28-Nov-18	Registry event updates backdated greater than three days Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as the controls in place will mitigate the risk most of the time. There is a potential minor impact on settlement, hence the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The late paperwork from FSP has been highlighted as an issue as it's a very paper based process. In the short term more monitoring of paperwork/ outstanding paperwork is being done. To ensure it doesn't go overdue.		Happening Now
Preventative actions taken to ensure no further issues will occur		Completion date
We are currently working with our IT Team to move forward with a automated new connection process which will start with online applications and right through to the FSP with a tablet completing all required parts on a tablet in the field and sending instantly back on completion of the job		Would like to say 2019
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: 7(1),(4) and (5) Schedule 11.1 From: 01-Sep-17 To: 20-Nov-18	Incorrect NSP for two ICPs 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	Controls are rated as moderate as the process will mitigate errors most of the time. The volume of potentially mismapped ICPs is low therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We need to go right back to the start with this to ensure we capture all parts-identify the process and the monitoring /reporting of it		Jan to Mar
Preventative actions taken to ensure no further issues will occur		Completion date
We need to have layers on our GIS system to show the NSP for each location, sounds simple but does require other departments and good GIS connectivity to ensure its correct		Before May
		Identified

Distributors to Provide ICP Information to the Registry manager			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1)(o)&(p) Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 28-Nov-18</p>	<p>Two ICPs with distributed generation details missing.</p> <p>One ICP incorrectly recorded as non-dedicated</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 as they will mitigate risk most of the time.</p> <p>The audit risk rating is low as this information does not have a direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We need to go right back to the start with this to ensure we capture all parts-identify the process and the monitoring /reporting of it		Jan to March	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We need to have layers on our GIS system to show the NSP for each location, sounds simple but does require other departments and good GIS connectivity to ensure its correct		Before May	

Creation of loss factors		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 11.2 From: 01-Dec-17 To: 28-Nov-18	Loss factors are not accurate in relation to reconciliation losses. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as weak because loss factors are not changed to reflect reconciliation losses. UFE is allocated to participants; therefore, there is no adverse impact on settlement; however retailers may use published losses in pricing decisions, therefore the use of inaccurate loss factors could lead to incorrect pricing, which is considered a moderate impact.	
Actions taken to resolve the issue		Completion date
Locate the Loss Factor owner at AEL and start the process of addressing the review. Our Regulatory Team a looking at altering the billing system which is planned for March. I have requested that with this alteration loss factors to be included and reviewed. I have offered assistance to engage the required staff.		March/April
Preventative actions taken to ensure no further issues will occur		Completion date
Change the review date in the registry to annually to ensure its reviewed and not an open ended date		Jan