

COMPLIANCE PLAN

OCTOBER 2019

ELECTRA

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 26-May-19 To: 24-Oct-19	Some information in the registry inaccurate and requires correction or is not populated at all 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 recorded controls as moderate as some elements have improved since the last audit due to additional exception reporting and data correction plans implemented. Audit risk rating is assessed as low due to the steps above reducing the number of ICPs affected. Minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
The Audit compliance report is run on a weekly basis.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Items in the Audit compliance report are validated against the previous report to check on the progress against the previous report		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: 11.2(2)</p> <p>From: 26-May-19</p> <p>To: 24-Oct-19</p>	<p>Incorrect data is identified for some registry fields and corrected but, in some cases, it is identified late and results in backdating transactions in the registry. The IECD needs to be updated at within the required time frame to avoid it becoming a data correction problem and non-compliant</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		
<p>Low</p>	<p>Controls are recorded as moderate because some processes are not fully developed. Audit risk rating is recorded as low because there is a minor impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The Audit compliance report is run on a weekly basis.</p>		<p>Ongoing</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Items in the Audit compliance report are validated against the previous report to check on the progress against the previous report</p>		<p>Ongoing</p>	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 26-May-19</p> <p>To: 24-Oct-19</p>	<p>Initial Electrical Connection Date (IECD) is not recorded for 47.4% of new ICPs. Some IECD populated in the registry more than 10 days after the event</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>Controls are recorded as weak. Whilst improvements have been made such as exception reporting and improving contractor reporting it has yet to significantly improve timeliness and quality 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
Run the new Audit Compliance report on a weekly basis.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Requirement in the ICP request process added for the Retailer to provide the details of their livening agent.</p> <p>This will allow Electra to follow up with the nominated person</p>			

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 26-May-19 To: 24-Oct-19	A number of registry information updates were greater than 3 business days from the event date. 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 as some exception reporting is place and appears to be having a positive effect. 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
Time is set aside on a weekly basis to focus on correcting the addresses		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Most of the hard to find addresses are historic of nature. There are controls in place to not repeat.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 26-May-19</p> <p>To: 24-Oct-19</p>	<p>For 551 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: 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 exception reporting has been developed along with a plan to correct the addresses. No impact on settlement outcomes. Audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A script is written on the source database "MilSoft" to identify problem addresses. In some cases, a site visit is required to resolve the issue. Many are historic and is difficult to find and correct.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Much effort is put into the ICP request process with the retailer to ensure we have the required information prior to issuing the ICP</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1)(m)(o)(p) of Schedule 11.1</p> <p>From: 26-May-19</p> <p>To: 24-Oct-19</p>	<p>Incorrect or missing information in the registry for ICP addresses, UML, distributed generation and Initial Electrical Connection Date</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		
<p>Low</p>	<p>The controls are recorded as moderate because during the audit evidence was produced showing process changes and exception reporting to identify errors and correct them earlier. Plans are in place to correct historical errors. Minor impact on settlement outcomes. Audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Scripts are being developed to compare fields in the data source in order to identify any fields not aligned. These scripts will be run on a weekly basis initially</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Electra have implemented a new weekly reporting regime where the authorised network contractors report back work completion information to Electra directly. This will include the date a new connection was made to the network and the date the ICP was energised.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: 20 of Schedule 11.1</p> <p>From: 26-May-19</p> <p>To: 24-Oct-19</p>	<p>A high number of ICPs (302) with inactive ready for decommission status in the registry. A number of these have been in this status for over 5 years.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Last Audit</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as moderate due to the improvements made to the process. No impact on settlement outcomes. Audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Regular communication with the retailers		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Establishment of a process to be followed for decommissioning of ICP's		Ongoing	