

## Compliance plan for Mountain Power – 2019

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: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The control strength ranges from none to strong when considering the entire operation. There is definitely room for improvement. I have recorded the controls as moderate overall. The audit risk rating is low as the errors have a minor impact on reconciliation and participants.	
Actions taken to resolve the issue		Completion date
Monthly Reporting of all new ICP's, ensuring appropriate fields within the Registry are completed in a timely fashion.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above		As above
		Remedial action status
		Identified

Timeliness of Provision of ICP Information to the registry manager	
Non-compliance	Description
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 30-Dec-17 To: 12-Feb-18	ICP 0000030083MOE29 changed to Ready after electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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
Monthly Reporting of all new ICP's, ensuring appropriate fields within the Registry are completed in a timely fashion		Ongoing	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: 7(2A) of Schedule 11.1</p> <p>From: 17-Jul-17</p> <p>To: 15-Feb-19</p>	<p>Late updating of the initial electrical connection date for 66 ICPs.</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: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>There are no steps in place to identify and correct missing IECD fields.</p> <p>The impact on and participants is minor because this field is used to validate other fields against; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Weekly Reporting of all new ICP's, ensuring IECD dates are entered within the Registry as and when they occur.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

Monitoring of “new” & “ready” statuses			
Non-compliance	Description		
Audit Ref: 3.14 With: Clause 15 Schedule 11.1  From: 31-Jan-19 To: 15-Feb-19	ICP 0000012400MO12F at Ready for 24 months and no check with the trader. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	This ICP is in the process of being addressed. The controls have room for improvement to identify these instances sooner.  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
Monthly Reporting of all ICP’s that have not been livened ie: remain in a ready state. Enquire as to current status of these. Registry to be updated as required.		Ongoing	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: 8 Schedule 11.1  From: 01-Feb-18 To: 31-Dec-18	Registry event updates backdated greater than three days. 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	I have rated the controls as moderate as the controls in place will mitigate the risk most of the time but there is room for improvement  There is a potential minor impact on participants, hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status

Monthly Reporting of ICP's that have had changes made to them. Fields updated accordingly within the Registry.	Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above	As above	

Notice of NSP for each ICP			
Non-compliance	Description		
Audit Ref: 4.2 With: 7(1),(4) and (5) Schedule 11.1  From: 08-Aug-06 To: 15-Feb-19	Incorrect NSP for three ICPs.  Potential impact: Medium  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate as the process will mitigate errors most of the time.  The volume of potentially mis-mapped ICPs is low therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Ensuring all New ICP's have the correct NSP loaded against them and if not, correcting this within the Registry.		Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
As above		As above	

ICP location address	
Non-compliance	Description
Audit Ref: 4.4 With: Clause 2 Schedule 11.1  From: 30-Jun-16 To: 15-Feb-19	14 addresses not able to be readily located.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Moderate  Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Difficult to address when local council does not hold updated street address details. These are for new subdivisions which in many cases need to use lot numbers as no street numbers have been allocated.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

Distributors to Provide ICP Information to the Registry manager			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1)(o)&amp;(p)</p> <p>Schedule 11.1</p> <p>From: 01-Feb-18</p> <p>To: 15-Feb-19</p>	<p>65 IECD fields blank.</p> <p>One ICP with distributed generation details missing.</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		
<b>Low</b>	<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
All recommendations taken on board and processes to be improved to reflect this.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New processes implemented.		Ongoing	

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 7(3) Schedule 11.1  From: 24-Nov-17 To: 12-Feb-18	Backdated price category code population for ICP 0000030083MOE29. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Monthly Reporting of all new ICP's, ensuring appropriate fields within the Registry are completed in a timely fashion		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above		As above
		Remedial action status
		Identified