

## Compliance plan for Orion – 2019

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 06-Mar-18 To: 27-Nov-18	3 ICPs 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	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
On one occasion the backdating of ready was the action taken to resolve an issue. The issue was we received approval from the retailer the same day the ICP was livened. This occurred because the retailer had sent the metering SR to the contractor before sending Orion the approval. Orion had to change the ready date so the retailer could make the ICP active before the livened date.		25/9/18
The two other instances were processing issues/human error. The backdating of ready was the action taken to resolve this issue.		27/2/18 15/11/18
Preventative actions taken to ensure no further issues will occur		Completion date
Continuing communication with retailers and contractors.		Ongoing
		Cleared

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Sep-17 To: 31-Dec-18	Updates to registry backdated greater than 3 business days of the event. 20 incorrect event dates for DG updates. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Nearly all of the late updates were as a result of late information from other parties. Controls are strong and processes are well designed, but there will always be requests from other parties to backdate certain events. There is no impact on settlement. There would be a negative impact on traders and customers if Orion did not backdate pricing events. The Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Orion will continue its strong process controls, addressing of items raised by exception reporting and follow-up with contractors.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Review manual registry updating practices for DG backdating with relevant employees. Identify if any automation could be applied between the Orion connections database and the registry for instances of DG backdating.		Immediately 1/6/19	

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)</p> <p>Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 14-Feb-19</p>	<p>Three initial electrical connection dates incorrect.</p> <p>Eight ICPs have a blank IECD.</p> <p>Seven ICPs don't have DG recorded.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
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>There is no impact on settlement in relation to incorrect initial electrical connection dates. The initial electrical connection date is used as a comparison for other dates but should not be relied on or copied by other participants. The traders have the correct metering and profile for the seven DG ICPs. The impact on other participants is minor and the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
3 IECD dates incorrect- Processing errors will happen from time to time but given the volume of data processed the error rate is insignificant. Relevant employees understand the implications of processing errors and will correct these immediately when identified.		Complete	Cleared
Eight ICPs have a blank IECD- There are various reasons for this occurring including central supply situations, retailer error then reversed, and programming errors. The programming errors were as result of a transitional issue during the introduction of a new livening app. This has been resolved.		Complete	
Seven ICPs don't have DG recorded- There are various reasons for this occurring including (a) no application received from customer/agent by Orion, (b) import/export meter in place but no application for DG received by Orion, customer confirms no DG, meter recording no export, (c) import/export meter in place, application for DG received by Orion and later cancelled by installer, site visit confirms no DG, (d) no generation data, DG application received but no CoC as yet.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing monitoring, inspection and follow-up with relevant parties		Ongoing	

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
<p>Audit Ref: 4.7</p> <p>With: Clause 7(3) Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 31-Dec-18</p>	<p>12 late price category code updates.</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>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
<p>As a general comment any back-dating of price category code or registry information applied by Orion is done because:</p> <ul style="list-style-type: none"> <li>information has come through to us late from other parties, or</li> <li>other parties have requested the back-dating, or</li> <li>the back-dating is done to benefit the customer.</li> </ul> <p>Many of the issues identified in this audit relate to customer activity at the ICP site not notified to Orion at the time which then has subsequent implications for pricing generally for the benefit of the customer. On the odd occasion decommissions, originally for load transfer, require reversal when the transfer does not in fact eventuate. Other issues relate to pricing re-categorisation. Generally, the backdating actions are to resolve an issue for the benefit of the customer.</p>		12/2/19
Preventative actions taken to ensure no further issues will occur		Completion date
Ensure recategorisation changes are processed in a timely fashion.		Ongoing
		Cleared

Notification of shared unmetered load ICP list		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 11.14(2) and (4) From: 14-Jan-19 To: 14-Feb-19	Shared unmetered load removed for ICP 0005558387RNC8B. 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
Orion is awaiting confirmation from our auditor via the Authority as to whether the shared UML child ICP will need to be reinstated. Note: notification did occur after shared IML child ICP removal		Pending
Preventative actions taken to ensure no further issues will occur		Completion date
See above		Pending
		Identified