

Compliance plan for Delta MEP – July 2020

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 01-Jul-19 To: 19-May-20	Registry not always updated as soon as practicable by Delta. Potential impact: Medium 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 because there is room to improve processes. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Aurora act as an agent for Registry updates. To alleviate these issues, this function is to be migrated in-house urgently. <ul style="list-style-type: none"> - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates by Delta staff 		30/06/2020 31/07/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Migrate Gentrack and Registry management and administration from Aurora to Delta. Manual data entry in Gentrack Velocity to be performed and monitored locally.		January 2021
		Identified

Metering Installation Design & Accuracy		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 19-Aug-19 To: 23-Jun-20	One metering installation with CTs which do not meet minimum metering accuracy class requirements. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate because there is room to improve processes. There may be a moderate impact on metering installation accuracy; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
Unfamiliar CTs are installed on this site. The CTs are to be replaced and the metering installation re-certified (Resultantly, no further CT investigations necessary)		31/08/2020
Preventative actions taken to ensure no further issues will occur		Completion date
More analysis of CT details and other metering components during the certification process discussed and implemented immediately.		30/06/2020
		Identified

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-Jul-19</p> <p>To: 19-May-20</p>	<p>Nine records not updated to the registry within 10 business days.</p> <p>Potential impact: Medium</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>I have recorded the controls as weak as they had not been sufficient to prevent late updates.</p> <p>The impact on participants, customers or settlement could be minor where a certification update is late; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Aurora act as an agent for Registry upkeep, changes and record-keeping. This and other functions need to be migrated in-house as soon as practicable.</p> <ul style="list-style-type: none"> - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates and maintenance by Delta staff 		<p>30/06/2020</p> <p>31/07/2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Migrate Gentrack and Registry management and administration from Aurora to Delta.</p> <p>Manual data changes in Gentrack Velocity to be performed and monitored locally. Up-to-date and correct information will then be generated in the Registry.</p>		By January 2021
		Identified

Provision of Registry Information			
Non-compliance	Description		
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Jul-19</p> <p>To: 19-May-20</p>	<p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</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>I have recorded the controls as moderate in this area. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Aurora act as an agent for Registry accuracy and record-keeping. These functions are to be migrated in-house as soon as practicable.</p> <ul style="list-style-type: none"> - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates/record-keeping by Delta staff 		<p>30/06/2020</p> <p>31/07/2020</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Migrate Gentrack and Registry management and administration from Aurora to Delta.		January 2021	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Jul-19 To: 19-May-20	Discrepancies not resolved within 5 business days. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate because they mitigate risk most of the time, but some late updates still occur. Some of the discrepancies may have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Aurora act as an agent for reporting and resolution of discrepancies in the Registry. This work function is to be migrated in-house as soon as possible. <ul style="list-style-type: none"> - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates by Delta staff 		30/06/2020 31/07/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Migrate Gentrack and Registry management and administration from Aurora to Delta for easier monitoring. Manual data entry in Gentrack Velocity to be performed and monitored locally.		January 2021
		Identified

Cancellation of Certification		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 01-Jul-19 To: 19-May-20	Certification cancelled, and registry not updated within 10 business days for 14 ICPs with low burden. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate in this area because most processes are managed with sufficient controls to avoid cancellation of certification. The installations with low burden are all recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for Delta is to cancel certification on the registry once they know certification is cancelled and the impact of not doing this is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Aurora act as an agent for Registry updates. This function is to be migrated in-house urgently. <ul style="list-style-type: none"> - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates by Delta staff 		30/06/2020 31/07/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Migrate Gentrack and Registry management and administration from Aurora to Delta. Create a personnel interface between certification and registry updating.		January 2021
		Identified

Certification and Maintenance			
Non-compliance	Description		
Audit Ref: 7.1 With: Clause 10.38 (a) From: 01-Jul-19 To: 19-May-20	Certification expired for 33 ICPs. Certification late for 7 ICPs. Certification cancelled for 14 ICPs. Potential impact: High Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as moderate in this area because certification is maintained for most ICPs. The impact on settlement is recorded as low because no inaccuracies were found; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Aurora act as an agent for Registry updates. This function is to be migrated in-house urgently. <ul style="list-style-type: none"> - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates by Delta staff 		30/06/2020 31/07/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Migrate Gentrack and Registry management and administration from Aurora to Delta. Manual data entry in Gentrack Velocity to be performed and monitored locally. Create direct personnel interface between certification and registry updates.		January 2021	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Jul-19 To: 19-May-20	Five metering installations with time keeping error are not checked every 12 months. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as none as there is no process in place to check the time keeping error for these installations. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Meters with internal time clocks were purchased and a plan is to be devised so as to enable monitoring and correction of drift to meet Code requirements.		31/08/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Prepare a calendar for site visit and checks.		31/08/2020
		Investigating