

Compliance plan for Centralines Distributor – 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 24-Mar-22 To: 05-May-22</p>	<p>The date used for the population of distributed generation information for ICP 0000034385CH62F does not reflect the actual distributed generation connection date.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as there are robust checks in place to ensure that the registry is updated accurately.</p> <p>The risk rating is low, because the incorrect population of the affected registry attributes does not have a settlement impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
This has now been corrected	22/8/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The DG information is normally populated on receipt of the application using the anticipated date. The DG applications normally come to Centralines directly from the installer so not sure why this did not happen in this case. From our perspective, this is a one-off error and does not constitute a pattern of behaviour.		

Non-compliance	Description		
Audit Ref: 2.2 With: Clause 11.2(2) and 10.6(2) From: 05-May-21 To: 02-Nov-21	The decommission date for ICP 7008003000CH04F was found to be incorrect due to human error and has not been corrected on the registry. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as there are robust checks in place to ensure that the registry is updated accurately. The risk rating is low, because the incorrect population of the affected registry attributes do not have a settlement impact.		
Actions taken to resolve the issue		Completion date	Remedial action status
I have requested the metering transaction to be removed so we can decommission using the correct date. This has been corrected as at 25/8/2022.		25/8/22	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Going forward we will ensure all decomms are actioned using the correct date.		22/8/22	

Non-compliance	Description		
<p>Audit Ref: 2.4 With: Clause 11.30A From: 01-Feb-22 To: 31-Jul-22</p>	<p>Information relating to the dispute resolution scheme is missing from IVR for all incoming calls to Centralines. Some email communications also missing references to the dispute resolution scheme. Centralines Facebook page has no reference to the dispute resolution scheme.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate as while efforts have been made to include information relating to the disputes resolution scheme to customers, there appears to be no urgency resolving the IVR issue and not all email signatures have been updated as yet.</p> <p>The risk rating is low because the website includes clear information which is where most customers go for information.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The information missing from IVR for incoming calls was as a result of a new phone system when Centralines moved offices recently. Once they became aware of the issue, a service request was raised so we are disputing the comment that there was no urgency resolving this issue. This has now been fixed.</p>		22/8/2022	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our understanding is that Centralines complies with the requirement for providing UDL information for customer facing correspondence so can you please provide us with specific examples of non-compliance.</p>			

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of schedule 11.1</p> <p>From: 01-Dec-19</p> <p>To: 31-May-22</p>	<p>One ICP (0000034511CHEC4) with an incorrect IECD.</p> <p>Eight initial electrical connection dates not updated within ten business days.</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	
Low	<p>Controls are rated as moderate as there is a digital form available for the field technicians to use that would reduce the delays in providing the completed new connection paperwork – this online form has not yet been adopted by the relevant personnel.</p> <p>The risk rating is low this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
While we accept there may have been a few ICP's where the IED was populated outside the 10-day timeframe, and one ICP where we were provided with incorrect information from Centralines, there were no ICP's without an IED which suggests our controls are relatively strong.	22/8/22	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
We already monitor any ICP's that are energized in the Registry that do not have the IED populated and follow these up with Centralines.	22/8/22	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 26-Jan-20</p>	<p>468 pricing updates, two decommission status updates and ten distributed generation updates were updated more than three business days after the event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as there are robust checks in place to ensure that the registry is updated as soon as possible where possible.</p> <p>The risk rating is low, because most of the delayed updates were processed within 30 days. Based on the sample checked, the later updates appear to be mostly data corrections.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
There will always be late updates to pricing. Generally speaking if a retailer requests a Price Category change that is not more than a few weeks old, we will allow that change to go through.	1/9/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As you have already mentioned, our controls are strong as we already have checks in place. We have also changed our process for updating distributed generation which should improve this aspect going forward.	1/9/22	

Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 01-Dec-19</p> <p>To: 31-May-22</p>	<p>One ICP (0000034385CH62F) with distributed generation details incorrect.</p> <p>One ICP (0000034511CHEC4) with an incorrect initial electrical connection date populated.</p> <p>Five ICPs with unmetered load 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	
Low	<p>Controls are rated as moderate as the process to prepopulate distributed generation information can lead to incorrect information being populated on the registry.</p> <p>The risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
With regard to pre-populating distributed generation information, this is checked once we are notified that the EG meter has been installed to ensure information is correct.	1/9/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Going forward, I will monitor the queue items for any ICP's where we have populated DG information and the job may not have gone ahead.	1/9/22	