

Compliance plan for Orion Distributor – 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Jan-19 To: 30-Apr-22	Incorrect event date applied to registry for the initial electrical connection date update. Potential impact: Low Actual impact: None Audit history: Once 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. There is no impact to the market therefore I have rated the audit risk rating as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will review our registry updates which fall over midnight.	29/07/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Update process to include above actions	31/12/2022	

Removal or breakage of seals		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 48(1A) and 48(1B) of Schedule 10.7 From: 01-Feb-21 To: 30-Jun-22	Seals not replaced and MEP not notified when control devices are bridged. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. 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
1) Getting our contractor Connetics to reseal the meter after bridging with an Orion seal. 2) Include the MEP when notifying the trader that bridging has occurred for them to inspect the meter and reinstate their seals. Orion jobs will record the person who undertook the bridging.	31/12/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Update process to include the above actions	31/12/22	

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: 01-Jun-20 To: 30-Apr-22	59 ICPs changed to “ready” after electrical connection. Potential impact: Low Actual impact: Low Audit history: Twice 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	Remedial action status
Orion has a strong process in place with minor errors, mainly due to human error which are corrected where these have been identified	29/7/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further preventative actions	29/7/2022	

Timeliness of Provision of Initial electrical connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Jun-20 To: 30-Apr-22	210 late updates of the initial electrical connection date. Potential impact: Low Actual impact: Low Audit history: Once 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 audit risk rating is assessed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Adjust the automated registry update process so that the IECD and the event date is the same	30/09/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	30/09/2022	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 01-Jun-20 To: 30-Apr-22	59 ICPs electrically connected prior to a trader being recorded as having accepted responsibility. Potential impact: Low Actual impact: Low Audit history: Once 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 audit risk rating is assessed to be low as this affected only 59 ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion has a strong process in place with minor errors from human error. These are quickly corrected when identified,	29/7/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further preventative action required.	29/7/2022	

Meter bridging		
Non-compliance	Description	
Audit Ref: 3.18 With: Clause 10.33C From: 01-Feb-21 To: 30-Jun-22	Approval from trader not always gained when meters are bridged. 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 as traders are always notified of bridging. The audit risk rating is assessed to be low as the volume of bridged meters is small and therefore the potential impact of reconciliation is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
In all cases the retailer is notified that bridging has occurred to reconnect the customer as soon as practically possible. Staff undertake bridging in this manner to ensure customers are connected as soon as possible and while they are onsite. Otherwise, it may take a long time to gain approval waiting for a response if we sought approval in all bridging situations.	29/7/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further preventative action required	29/7/2022	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Jun-20 To: 30-Apr-22	Updates to registry backdated greater than three business days of the event. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong. Orion has robust checks and processes in place to ensure wherever possible events are updated to the registry as soon as possible. The audit risk rating is low as the volume of backdated events is small and those backdated have little to no impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion has strong controls in place. Some notification activities rely on the timeliness of third parties which can impact our level of compliance. Orion's NSP update process is automated. Manual intervention is required where backdating needs to be done to address NSP changes in the timeline	29/7/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We do not intend taking further preventative action	29/7/2022	

Distributors to Provide ICP Information to the Registry		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1 From: 21-Jul-21 To: 30-Jun-22	One initial electrical connection date recorded in error. One ICP with incorrect distributor unmetered load recorded. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as Orion have robust reporting and processes in place to identify potential discrepancies and any found are corrected. There is no impact on settlement in relation to the incorrect registry information therefore I have recorded the audit risk rating as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Information will be corrected in the registry as it becomes available.	29/7/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Orion contacts and discusses this with third parties to align the registry data as an ongoing activity.	29/7/2022	

Notification of shared unmetered load ICP list		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 11.14(2) and (4) From: 14-Oct-14 To: 30-Jun-22	Unmetered load recorded as shared unmetered load when it should be recorded as standard unmetered load and the SI ICPs be decommissioned. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as Orion has robust checks in place. All four instances are exceptions. 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
Orion will update and make the necessary corrections after discussion with the customer or trader	29/7/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No additional preventative action is planned as new shared unmetered load has been discontinued.	29/2/2022	