

Compliance Plan Alpine Energy Ltd Distributor 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clauses 11.2(1) and 10.6(1)</p> <p>From: 01-Jul-21</p> <p>To: 31-Aug-22</p>	<p>Four ICPs became active during the audit period but had no initial electrical connection date populated.</p> <p>Incorrect IECD dates populated for 26,266 active ICPs prior to the requirement to populate this information.</p> <p>Potential impact: Low</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>The controls are rated as moderate with areas of improvement identified.</p> <p>The audit risk rating is low as the discrepancies identified have little or no direct impact on reconciliation.</p>	
Audit Comments for reference	Completion date	Remedial action status
Field staff not returning NCA paperwork timely has still been an issue, we have a very manual system reliant of field staff to complete a paperwork task which additionally has no reporting data back to the office staff. CAT 2 metering has also been problem with the field staff worker not returning paperwork at the time of livening vs metering being completed.	Now in place	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have as an immediate improvement introduced a NCA working Team with a working list of all issued work to field staff of NCA paperwork, which is updated, reviewed daily and followed up on to confirm completed and outstanding work, this will assist on all field related paperwork.	Now in place	

Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7 From: 01-Jul-21 To: 31-Aug-22	Four ICPs became active during the audit period but had no initial electrical connection date populated. 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	The controls are rated as strong as they will eliminate risk to an acceptable level. The audit impact is assessed to be low due to the number of ICPs with no initial electrical connection date recorded.	
Actions taken to resolve the issue	Completion date	Remedial action status
[Field staff not returning NCA paperwork timely has still been an issue, we have a very manual system reliant of field staff to complete a paperwork task, which additionally has no reporting data back to the office staff	Now in place	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have as a quick improvement introduced a NCA working Team with a working list of all issued work to field staff of NCA paperwork, which is updated, reviewed daily and followed up on to confirm completed and outstanding work.	Now in place	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 31-Aug-22</p>	<p>Late update to the registry for one ICP electrically connected during the audit period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as they will eliminate risk to an acceptable level.</p> <p>The audit risk rating is low as this only affected one new connection.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Due to the manual ness of our systems human error can still occur, we are reviewing our processes and current registry reporting to ultimately fully remove this one off type occurrences.	Underway currently	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Timeliness of reporting is a factor we are considering in the short term to really try and find these errors, due to the lack of consistency with one off error we know the current process is working even though it is manual.	Under review currently	

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-Jul-21 To: 31-Aug-22</p>	<p>12 late initial electrical connection date updates.</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>The controls are recorded as strong, there has been an improvement with the use of the audit compliance reporting.</p> <p>The impact on participants is minor because this field is used to validate other fields against.</p>	
Audit Comments for reference	Completion date	Remedial action status
<p>we still struggle with a manual paperwork system to the field and with the returned paperwork, we have added more registry reporting since our last audit and now a NCA paperwork report, receiving returned paperwork on the day of metering and livening will result in more accurate paperwork</p>	Underway	Identified
Preventative actions that were planned	Completion date	
<p>We have identified and addressed a common person responsible for more than their share of late or inaccurate dated paperwork and we have and are working with them, and all our field service staff to assist them with easier ways of completing and returning paperwork quickly after livening to assist with data accuracy. This with our NCA paperwork improvements, review and updates will reduce the few late and incorrect information.</p>	Underway	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 31-Aug-22</p>	<p>672 late pricing updates.</p> <p>49 late address updates.</p> <p>Four late status updates.</p> <p>39 late network updates.</p> <p>11 late distributed generation updates.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 because are sufficient to ensure that the registry is updated within three business days most of the time.</p> <p>The audit risk rating is assessed to be low as the volume of late updates is relatively low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Through the staff changers within teams the continual work stream had not been passed on to new staff resulting in updates not being entered timely or correctly, these staff members have since created a documented process as well as a resilience structure to ensure this is covered when staff are away	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Preventative actions taken to ensure no further issues will occur	
Through the staff changers within teams the continual work stream had not been passed on to new staff resulting in updates not being entered timely or correctly, these staff members have since created a documented process as well as a resilience structure to ensure this is covered when staff are away	Completed	

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(o)&(p) Schedule 11.1</p> <p>From: 01-Jul-21 To: 31-Aug-22</p>	<p>Incorrect NSP dedicated/non-dedicated flag applied to some ICPs.</p> <p>Four electrically connected ICPs with no initial electrical connection date recorded.</p> <p>One ICP with the incorrect initial electrical connection date recorded.</p> <p>Potential impact: Low</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>Controls are rated as moderate as the ICP database issues are hindering Alpine's ability to comply.</p> <p>The audit risk rating is low, as the incorrect NSP dedication has a direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
The implementation of additional process steps will aim in the reduction of non-compliances going forward which has been implemented since our audit.		Started and on going
Preventative actions taken to ensure no further issues will occur		Completion date
As we have improved our BAU metering paperwork we will look to improve where we can with the systems we have through reporting and manual follow ups.		Started and on going
Remedial action status		
Identified		

Management of “decommissioned” status		
Non-compliance	Description	
Audit Ref: 4.11 With: 20 Schedule 11.1 From: 01-Jul-21 To: 31-Aug-22	Ten ICPs with the incorrect decommissioning date recorded. 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
Additional process structure has been added to ensure field paperwork is returned accurately and timely.		Started and Under review
Preventative actions taken to ensure no further issues will occur		Completion date
The whole decommission process is under review encompassing people, process, paperwork, notifications and updates to ensure accurate data going forward.		Under review
		Identified

Updating table of loss category codes		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 21 Schedule 11.1</p> <p>From: 01-Jul-21 To: 31-Aug-22</p>	<p>Required notice period not provided for four new loss category codes.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</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>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 settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Although late the update has now been completed, ownership of this process has now been reassigned to mitigate this in the future.	Now complete but with review periods	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
With the introduction of new team members into the commercial and regulatory department they have already made progress within the loss factor publishing, the next focus will be the ongoing reviews of these with timely updates.	Will be ongoing work	

Updating loss factors		
Non-compliance	Description	
<p>Audit Ref: 5.2</p> <p>With: Clause 22 Schedule 11.1</p> <p>From: 01-Jul-21 To: 31-Aug-22</p>	<p>Required notice period not provided for four updated loss category codes.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</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>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 settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Although late the update has now been completed, ownership of this process has now been reassigned to mitigate this in the future.</p>		<p>Now complete but with review periods</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>With the introduction of new team members into the commercial and regulatory department they have already made progress within the loss factor publishing, the next focus will be the ongoing reviews of these with timely updates.</p>		<p>Will be ongoing work</p>
Identified		

Creation of loss factors			
Non-compliance	Description		
<p>Audit Ref: 8.1</p> <p>With: Clause 11.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Aug-22</p>	<p>Loss factors are not accurate in relation to reconciliation losses.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate, the loss factors have been updated, and it will take time for the corrections to flow through and be reflected in the UFE graph for the updated and new loss factors.</p> <p>UFE is allocated to participants; therefore, there is no adverse impact on settlement; however, traders may use published losses in pricing decisions, therefore the use of inaccurate loss factors could lead to incorrect pricing, which is considered to have a medium impact.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Loss factors had been identified in previous audits as requiring an update which we had completed a full detailed review of. This is now being worked on as an ongoing review and monitoring process being worked on by the planning engineers, from the information provided our commercial team is also investigating our UFE figures.</p>		<p>On-going annual internal reviews to be completed</p>	<p>Identified</p>
Preventative actions that were planned		Completion date	
<p>Updating our loss figures was our first challenge then getting them published and shared was our second. We had thought this was done in the required timeframes, we are now working on the review ready for FY23.</p>		<p>Underway</p>	