

Compliance Plan Aurora Network Distributor 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Feb-21 To: 31-Jan-22	Some missing initial electrical connection dates. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate as they mitigate risk but there is room for improvement. The audit risk rating is assessed to be low as the volume of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Aurora has corrected the ICPs with no IECD.	4 May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Aurora has implemented an internal compliance report that is monitored monthly. Any issues of non-compliance will be corrected immediately.	31 May 2022.	

Provision of ICP Information to the registry		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7 From: 01-Feb-21 To: 31-Jan-22	87 ICPs did not have an initial electrical connection date populated. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate as Aurora now have sufficient reporting in place to identify this. 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
Aurora has corrected the ICPs with no IECD.	4 May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Aurora has implemented an internal compliance report that is monitored monthly. Any issues of non-compliance will be corrected immediately.	31 May 2022	

Timeliness of Provision of ICP Information to the registry			
Non-compliance	Description		
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Feb-21</p> <p>To: 31-Jan-22</p>	<p>Late update to "ready" for 28 ICPs electrically connected during the audit period.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as strong as Aurora have changed the ICP creation process and the ICPs are from the old process, this issue should not happen in the future unless due to exceptional circumstance.</p> <p>The audit impact is assessed to be medium due to the volume of late updates which prevents the trader from making these ICPs active.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No further action is required.		4 May 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As noted in the comments above, the non-compliant ICPs were identified before the new process was implemented. The issue should not occur in the future.		4 May 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-Feb-21 To: 31-Jan-22	224 late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as Aurora have sufficient reporting in place to identify this, but there is still an opportunity to improve the return of paperwork from the field. 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
Aurora has corrected the ICPs with no IECD.		4 May 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora has corrected the ICPs with no IECD.		4 May 2022	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Feb-21</p> <p>To: 31-Jan-22</p>	<p>Updates to registry backdated greater than 3 business days.</p> <p>155 late pricing updates.</p> <p>1418 late address updates.</p> <p>21 late status updates.</p> <p>26 late network updates.</p> <p>5 late NSP updates.</p> <p>84 late distributed generation updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</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. Aurora has robust reporting in place which identifies discrepancies which ensures that discrepancies are identified but some errors still occur. The addresses were back dated, rather than just updated.</p> <p>The Audit risk rating is low as the majority of the changes have no impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Aurora backdates network pricing events where information that leads to a change in price category or pricing attribute has not been provided or has not been provided on time by a contractor. It would be disadvantageous to consumers to comply with this requirement in circumstances where Aurora has not applied altered pricing information in error, or where contractors have not provided Aurora information in a timely fashion.</p> <p>Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information.</p>	No Change	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Aurora has implemented an internal compliance report that is monitored monthly. Any issues of non-compliance will be corrected immediately.</p>	31 May 2022.	

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 of Schedule 11.1</p> <p>From: 01-Feb-21</p> <p>To: 31-Jan-22</p>	<p>Three ICPs with duplicate addresses and 1,624 ICPs with insufficient details.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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 they will mitigate risk most of the time but there is an opportunity for improvement.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation but could affect meter readers ability to get manual reads.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The identified non-compliant ICPs have been corrected.	4 May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Aurora will use a monthly exception report to identify non-compliant ICPs and then check against the council GIS data.</p> <p>This process is reliant on councils accurately maintaining their GIS data, so will probably not completely resolve the issue.</p>	31 May 2022	

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(l)&(p) of Schedule 11.1</p> <p>From: 01-Feb-21</p> <p>To: 31-Jan-22</p>	<p>14 of the sample checked with missing initial electrical connection dates.</p> <p>One active ICP of the sample checked with Initial electrical connection dates inconsistent with other fields.</p> <p>NSP dedication flag incorrect for two LE ICPs.</p> <p>Four ICPs with unmetered load with incorrect unmetered load value.</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. There is reporting in place to identify discrepancies but there is room for improvement.</p> <p>The audit risk rating is low as the errors found have a minor effect on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The non-compliant ICPs have been corrected.		4 May 2022.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The monthly internal audit report has been amended to identify instances of incorrect NSP flags.		31 May 2022	

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 7(3) of Schedule 11.1 From: 01-Feb-21 To: 31-Jan-22	Four ICPs with price category codes updated later than 10 business days of electricity being traded. Potential impact: Low Actual impact: Low Audit history: Multiple times previously 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 most of the time. The audit risk rating is recorded as low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Non-compliant ICPs have been corrected.	4 May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
An internal audit report is being run to identify issues of non-compliance and fix errors in a timely manner.	31 May 2022	