Compliance plan for Alpine Energy Distributor Audit 2021

Requirement to provide complete and accurate information	
Non-compliance	**Description**
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 01-Jan-21 To: 30-Jun-21	Three ICPs electrically connected during the audit period with no initial electrical connection date recorded. Incorrect IECD dates populated for 27,000 ICPs prior to the requirement to populate this information. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as moderate with areas of improvement identified. The audit risk rating is low as the discrepancies identified have little or no direct impact on reconciliation.

Audit Comments for reference	Completion date	Remedial action status
The AC020 report function was only picked up prior to our 2021 Audit after our report training session with Veritek, since then we have implemented this report running to pick up any errors that may occur.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
The running of the AC020 report twice weekly between Peter and Kai now ensures any IECD date conflict is now identified, checked and adjusted as required	In place	

Removal or breakage of seals	
Non-compliance	**Description**
Audit Ref: 2.3 With: From: 01-Jan-21 To: 30-Jun-21	Alpine did not seal the terminal cover for ICP 0006473601AL29E after the visiting the site. 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
Resealing a meter after bridging had been overlooked. Since the Audit we have addressed this and have arranged to procure "Alpine" seals to be used before the un-bridging fix is completed and the ATH seal is installed. Process and Training updates to FSP staff will be provided by Peter and Kai	Under way	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We are well under way with the seals, processes have been worked on and the MEP notification is completed. We have also added an internal report to ensure all bridged sites are monitored and fault resolved.	Will be all completed in November 2021	

Provision of information on dispute resolution scheme			
Non-compliance	**Description**		
Audit Ref: 2.4 With: 11.30A From: 01-Jan-21 To: 30-Jun-21	Utilities Disputes information is not provided across all correspondence queries and phone communications with consumers. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	**Rationale for audit risk rating**		
Low	The controls are recorded as weak because Alpine do not provide Utility Dispute information across all correspondence queries. Alpine are working to address this. The impact is low as information is available but is also required for all correspondence via phone or written.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**

As per the Guidelines received after workshops with the EA we need to raise awareness to the Utility Disputes. It is to note that the below clauses are non-prescriptive. It sets out As from the 01 April 2021 new clauses 11.30A and 11.30E of the code will: a) Require all retailers and distributors to provide clear and prominent information about Utility Disputes: 1. On their website 2. When responding to queries from consumers 3. In outbound communications directed to consumers about electricity services and bills. The code requires that clear and prominent information must only be provided once in a conversation under the Code, even though it does not override the obligation under the Utilities Disputes Scheme rules to provide the information at specific times during the dispute process. Clause 11.30D describes how participants do not need to continue to provide information about the Utility Disputes in any subsequent consumer communications on the same matter. Therefore in a series of related communication between the participant and consumer, the participant needs to provide this information in a t least one communication in that series. Directed outbound communications means personalized for a specific named customer about consumer electricity services and bills. Given the complexities around the Privacy Act we do not personalize (specifically name) a consumer on our communications. However we do raise awareness to the Utilities Disputes in these communications. The message should be fit for purpose in achieving the goal of raising consumer awareness of the services of the Utility Disputes As per the scheme rules: 12. Each Provider must: a) promote the relevant Scheme(s) on any invoice to customers and in other relevant customer information. b) have and comply with a documented Complaints process appropriate to the nature of their services and scale of their operations, including providing and keeping up to date information about the staff member(s) responsible for complaint handling. c) provide information about their Complaints process to their customers or consumers. d) ensure Complaints can be made in any reasonable form and are promptly recognised as Complaints	Has been in affect prior to the 01 April 2021 as per the scheme rules.	Identified

e) promptly refer Complaints made to them in error to the correct Provider. f) provide Utilities Disputes' contact details to Complainants when: • the Complainant first makes the Complaint to the Provider, • advising the Complainant of the outcome of the Provider's Complaints handling system, or, • the Complaint has reached Deadlock. g) when advising Complainants of the outcome of Complaints dealt with by the Provider's Complaints handling system, also advise Complainants that they may complain to Utilities Disputes, if they are not satisfied with that outcome.		
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We have the Utilities Disputes information on: 1. All invoices going directly to consumers 2. A link on the website raising awareness of the Utilities disputes 3. When we respond to a complaint, we raise awareness to the Utilities Disputes in the footer of the correspondence we have with the complainant. 4. We are adding in the details onto our email signature 5. We are creating a email address to specifically deal with complaints and thus making the consumer aware. 6. We ae looking at replacing our current phone management system and we will then be able to have a more automated response when a consumer is calling in with a complaint. We have complaints register where we log the complaint and track the correspondence with the consumer. A consumer has a number of avenues to lodge a complaint either via formal routes such as our website and email to social media platforms.	The first 3 points we implemented pre 01 April 2021. We have requested our digital services team to create and setup the email account. As we are busy with our digital strategy implementation of the this will be addressed as we have the correct software to enable us to automate the responses. We have a complaints process workflow document explaining the process and when to escalate the process.	

Provision of ICP Information to the registry manager	
Non-compliance	**Description**

Audit Ref: 3.3 With: Clause 11.7 From: 01-Jan-21 To: 30-Jun-21	Three ICPs became active during the audit period but had no initial electrical connection date populated. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate as this is usually captured but there is room for improvement. Most of the initial electrical connection dates were populated. The impact on participants is minor because this field is used to validate other fields against.

Actions taken to resolve the issue	Completion date	Remedial action status
Human error is still possible within our current ICP database, any reporting within our ICP system for fields with no information populated does not exist. We have now implemented the AC020 report to pick up these errors.	In place	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Kai and Peter run the reports twice weekly to identify and inconsistencies and update the database as required	Completed	

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-Sep-19 To: 31-Dec-20	38 late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate, there has been an improvement with the use of the audit compliance reporting. Most initial electrical connection dates were populated on time. The impact on participants is minor because this field is used to validate other fields against.

Audit Comments for reference	Completion date	Remedial action status
Process and improvements have been put in place since our previous audit, we are still reliant on our FSP to return paperwork to us timely which is now monitored however there is still delays. Kai and Peter now have in place the AC020 report twice weekly that is capturing the remaining data conflicts	In place	Identified
Preventative actions that were planned	**Completion date**	
We had hoped to have in place a fully electronic workflow system which would assist our internal processes and resolve the FSP timeliness as well as data accuracy from the field into our current database. This project was put on hold however may now have the green light to proceed.	In progress	

Changes to registry information	
Non-compliance	**Description**
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Jan-21 To: 30-Jun-21	379 late pricing updates. Four late address updates. Six late status updates. Seven late network updates. Three late distributed generation updates. Potential impact: Medium Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as moderate because are sufficient to ensure that the registry is updated within three business days most of the time. The audit risk rating is assessed to be low as the volume of late updates is relatively small.

Actions taken to resolve the issue	Completion date	Remedial action status
We download the EIEP 4 and EIEP8 files every day when they come in to check them as sometimes they need to be corrected before the database will load them successfully (EIEP4) as there might be to many characters i.e. a name might be over 50 characters, we then need to find the errors and upload them into the external data base which then automates them into the ICP database. As we have a known compliance issue with the allowed 3 days on EIEP8 (TARCHG) files, we check the files and if the files are not dated the day we receive them, we manually change the dates as this is out of our control from a compliance point of view, but it does allow us to reject LOWLCA requests when the user is not a LOWLCA, we do this by checking the address and other databases to ensure it is not a business of BNB etc. Once this has been done, we download the files into the external database, which automates the files in the ICP database. There are maintenance and back end files that we receive on a daily basis are automatically done through the registry gateway and ICP database. MN, NOT REQEUMAIN files. All these files go to the G:drive with any other reports we request from the registry	In place	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Kai and Peter run the reports twice weekly to identify any inconsistencies, check and update the database as required		

Distributors to Provide ICP Information to the Registry manager	
Non-compliance	**Description**
Audit Ref: 4.6 With: Clause 7(1)(o)&(p) Schedule 11.1 From: 01-Jan-21 To: 30-Jun-21	Incorrect NSP dedicated/non-dedicated flag applied to some ICPs. Three electrically connected ICPs with no initial electrical connection date recorded. Six ICPs with the incorrect initial electrical connection date recorded. Incorrect IECD dates populated for a large number of ICPs prior to the requirement to populate this information. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as moderate as the ICP database issues are hindering Alpine's ability to comply. The audit risk rating is low, as the incorrect NSP dedication has a direct impact on reconciliation.

Actions taken to resolve the issue	Completion date	Remedial action status
As noted in this audit and previous audits our ICP database is limiting us to the changers we would like to make. We have been working with our IT and GIS teams to create a process and complete a test batch bulk dedicated NSP change however the sample batch was unsuccessful. We endeavour to continue with identifying the database issue but resources from other teams is limited. The issues with our ICP database has been identified at a high level and more priority on its future replacement is looking more likely. The IECD errors are now identified through reporting by Kai and Peter		Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
All new ICP's NSP are entered correctly, and twice weekly reports for the IECD dates are in place picking up any errors that may occur.	Completed	

Creation of loss factors	
Non-compliance	**Description**
Audit Ref: 8.1 With: Clause 11.2 From: 01-Jan-21 To: 30-Jun-21	Loss factors are not accurate in relation to reconciliation losses. Potential impact: Medium Actual impact: Medium Audit history: Three times Controls: Weak Breach risk rating: 6
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are rated as weak as the loss factors haven't been updated within the indicated timeframe whilst losses continue to be too high. 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.

Actions taken to resolve the issue	Completion date	Remedial action status
Given we only completed the previous audit in February/ March 2021 this still stands as explained then. It will be updated by the end of the financial year as per previously indicated which is the 31 March 2022.	March 2022	Identified
Preventative actions that were planned	**Completion date**	
We are notifying retailers of the loss factor update and the registry will be updated in February 2022 as explained in the last audit. We have a process that we now update the loss factors on a rolling 7 months on a 24 month period to track non-technical loss factors and reconciliation as highlighted in the evidence collation for the audit and meeting.		