

Compliance Plan 2020

Electra

Non-compliance	Description		
Audit Ref: 2.1 With: Clause: 11.2(1) and 10.6(1) From: 01-Oct-19 To: 30-Sep-20	Inaccurate or missing information in the registry for distributed generation and Initial Electrical Connection Dates not populated in the Registry. 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 recorded as moderate as the exception report enhancements appear to have been effective in some areas. Historical information clean up planned at last audit appears to be happening. Although day to day information input poor. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
A review of the identified ICP's has begun and is expected to be resolved by the end of January 2021. The data cleansing initiative is ongoing.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A formal process review has been scheduled. This review will include monthly KPI management reporting and bi-annual quality assurance (QA) checks. Electra is committed to ensuring that the information we are responsible for is as accurate as possible but are subject to varying practices of individual Retailers.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With:</p> <p>Clause: 11.2(2) and 10.6(2)</p> <p>From: 01-Oct-19</p> <p>To: 30-Sep-20</p>	<p>Incorrect or missing historical information in the registry across a number of areas.</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 recorded as moderate as exception tools are in place appear not to be effective as they could be. Historical information clean up planned at last audit appears to be occurring slowly. Day to day information input poor creating more non-compliance. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>One of our GIS Analysts departed from the business earlier this year. We have recruited a new GIS Analyst who starts in December. This will enable us to resource the correction of historical information in addition to day-to-day activities.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A formal process review has been scheduled. This review will include monthly KPI management reporting and bi-annual quality assurance checks. Non-compliance on behalf of the Livening Agents and/or Retailers results in a formal notification and feedback process.</p> <p>Electra is committed to ensuring that the information we are responsible for is as accurate as possible but are subject to varying practices of individual Retailers.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With Clause: 7(2A) of Schedule 11.1</p> <p>From: 01-ct-19</p> <p>To: 30-Sep-20</p>	<p>24.9% of Initial Electrical Connection Date (IECD) were populated in the registry more than 10 days after the event and 43% were not recorded at all during the Audit Period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple Times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls recorded as weak because the actions from the last audit do not appear to have been effective. There is some evidence of historical information clean-up. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A review of the identified ICP's has begun and is expected to be resolved by the end of January 2021.</p> <p>Electra requires the use of approved Livening Agents.</p> <p>The data cleansing initiative is ongoing. One of our GIS Analysts departed from the business earlier this year. We have recruited a new GIS Analyst who starts in December. This will enable us to resource the correction of historical information in addition to day-to-day activities.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A formal process review has been scheduled. This review will include monthly KPI management reporting and bi-annual quality assurance checks. Non-compliance on behalf of the Livening Agents and/or Retailers now results in a formal notification and feedback process.</p> <p>Electra is committed to ensuring that the information we are responsible for is as accurate as possible but are subject to varying practices of individual Retailers.</p>			

Non-compliance	Description		
Audit Ref: 4.1 With: Clause: 8 of Schedule 11.1 From: 01-ct-19 To: 30-Sep-20	A significant number of registry information updates were greater than 3 business days from the event date. Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as weak because although planned exception report enhancements and some historical information clean-up appear to have happened evidence suggests. It appears high transaction volumes have been a challenge during this audit period. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra no longer support requests from Retailers to backdate Registry change requests. Our Data Cleansing initiative is affecting the compliance metrics. As this is ongoing it is expected to re-occur.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A formal process review has been scheduled. This review will include monthly KPI management reporting and bi-annual quality assurance checks.		Scheduled	

Non-compliance	Description		
Audit Ref: 4.4 With: Clause: 2 of Schedule 11.1 From: 01-Oct-19 To: 30-Sep-20	For 363 ICPs the address descriptions do not allow ICPs to be readily located 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 recorded as moderate because the exception report enhancements and some historical information clean-up appears to have happened as planned at last audit. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra's ICP lifecycle process reflects that ICPs without accurate location information will not be issued.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A plan of work is being established which seeks to resolve the historic issue within the next 6 months. A formal process review has been scheduled to include monthly KPI management reporting and bi-annual quality assurance checks.			

Non-compliance	Description		
Audit Ref: 4.6 With: Clause: 7(1)(m)(o)(p) of Schedule 11.1 From: 01-Oct-19 To: 30-Sep-20	Incorrect or missing information in the registry for distributed generation and Initial Electrical Connection Dates not populated in the Registry. 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 recorded as moderate as the exception report enhancements appear to have been effective for DG information along with historical information clean up planned at last audit. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
A review of the identified ICP's has begun and is expected to be resolved by the end of February 2021. The data cleansing initiative is ongoing.		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A formal process review has been scheduled. This review will include monthly KPI management reporting and bi-annual quality assurance checks. An automated workflow to identify and notify us of the change in billing code between L and B or G is being developed. Electra is committed to ensuring that the information we are responsible for is as accurate as possible but are subject to varying practices of individual Retailers.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.12</p> <p>With:</p> <p>Clause 23</p> <p>Schedule 11.1</p> <p>From: 01-Oct-19</p> <p>To: 30-Sep-20</p>	<p>New price category codes were entered into the registry tables 12 days less than the 2 months required by the code</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		
<p>Low</p>	<p>Controls recorded as moderate as the changes had been communicated in advance with Retailers. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Staff have been reminded to refer to our Pricing Checklist.</p>		<p>19/11/2020</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Electra has specifically added a section to its Pricing Checklist to identify the rules that require new prices be updated no less than 2 months prior to their active date.</p>		<p>19/11/2020</p>	