

Compliance plan for Eastland Network

Title: Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: 11.2(2) From/to: 1 Oct 2016 to 28 Feb 2017	Registry rejection file not picked up and actioned 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 management of registry rejection notification files could result in this occurring again and this could impact settlement outcomes.	
Actions taken to resolve the issue		Completion date
Action - Accept recommendation to check files daily		5 April 2017
Preventative actions taken to ensure no further issues will occur		Completion date
As above		5 April 2017
		Identified

Title: Participants May Request Distributors to Create ICPs		
Non-compliance	Description	
Audit Ref: 3.2 With: 11.5(3) From/to: 23 Dec 2016 to 9 Jan 2017	1 ICP not created within 3 business days of request 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 creation process is robust to the point of registry rejection file management. The management of registry rejection notification files could result in this occurring again which could impact settlement outcomes	
Actions taken to resolve the issue		Completion date
Brought to the attention of the Information Team that this important requirement is completed in a timely manner.		5 Apr 2017
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

As noted above 3 working day requirement has been reiterated and anticipate an improvement moving forward	5 Apr 2017	
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Title: Timeliness of the Provision of ICP Information to the Registry		
Non-compliance	Description	
Audit Ref: 3.4 With: 7(2) of Schedule 11.1 From/to: 5 Jan 2017 to 9 Jan 2017	1 ICP not updated to the registry before electricity was traded 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 population of the ICP data is robust to the point of registry rejection file management. The management of registry rejection notification files could result in this occurring again which could impact settlement outcomes	
Actions taken to resolve the issue		Completion date
Reliance on Livening Agents needs to be carefully monitored and regularly reviewed.		5 Apr 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Information Team follow this up on a regular basis		5 Apr 2017
		Identified

Title: Timeliness of the Provision of the Initial Energisation Date		
Non-compliance	Description	
Audit Ref: 3.5 With: 7(2) of Schedule 11.1 From/to: 1 Oct 2016 to 28 Feb 2017	21 Initial energisation dates updated late to the registry Potential impact: Low Actual impact: Low Audit history: Three time previously Controls: Strong Breach risk rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	The population of the initial energisation date is robust with strong controls in place therefore I have applied a low audit risk rating.	
Actions taken to resolve the issue		Completion date
Reliance on Livening Agents needs to be carefully monitored and regularly reviewed.		5 Apr 2017
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Reliance on Livening Agents needs to be carefully monitored and regularly reviewed.	5 Apr 2017	
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Title: Connection of ICPs		
Non-compliance	Description	
Audit Ref: 3.6 With: 11.17 From/to: 23 Dec 2016 to 9 Jan 2017	1 ICP without a trader recorded on the registry after electrical connection had occurred 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 population of ICP data is robust to the point of registry rejection file management. The management of registry rejection notification files could result in this occurring again which could impact settlement outcomes	
Actions taken to resolve the issue		Completion date
Reliance on Livening Agents needs to be carefully monitored and regularly reviewed.		5 Apr 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Reliance on Livening Agents needs to be carefully monitored and regularly reviewed.		5 Apr 2017
		Identified

Title: Changes to Registry Information		
Non-compliance	Description	
Audit Ref: 4.1 With: 8 of Schedule 11.1 From/to: 1 Oct 2016 to 1 Feb 2017	Updates to registry backdated greater than 3 business days of the event Potential impact: Medium Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	The population of ICP data is robust to the point of registry rejection file management. The management of registry rejection notification files could result in this occurring again which could impact settlement outcomes.	
Actions taken to resolve the issue		Completion date
Back dating will occur when Eastland is found to be in error, otherwise we refrain from back dating using date of notification.		5 Apr 2017
		Identified- actions to address registry

Preventative actions taken to ensure no further issues will occur	Completion date	notifications noted in Section 2.1
Good reasons need to be in place before any back dating is actioned.	5 Apr 2017	

Title: Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
Audit Ref: 4.6 With: 7(1)(p) of Schedule 11.1 From/to: 1 Oct 2016 to 1 Feb 2017	15 initial energisation dates populated incorrectly. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2		
Audit Risk Rating	Rationale for audit risk rating		
Low	The management of mismatching initial energisation dates needs some attention. As this is not used directly for reconciliation but as a check that traders are using the correct active date, it is likely to have no impact to market participants.		
Actions taken to resolve the issue		Completion date	Remedial action Status
I think it is appropriate to consider the impact of mismatching energisation dates. One trader (TRUS) does contest dates and Eastland have previously supplied scanned copies of source documents in support.		30 Jun 2017	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Given that the AC from the trader has previously been found defective on occasion, it is considered that the only preventative action available to Eastland is to challenge Trader dates where they do not align with Eastland dates. This will not prevent a situation where Eastland dates are received and uploaded prior to trader AC dates and subsequently the trader date does not match..		30 Jun 2017	