

# Compliance Plan MainPower Distributor 2021

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) and 10.6(1)  From: 08-Apr-20 To: 30-Aug-21	338 ICPs recorded against the incorrect NSPs and in different balancing areas. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  The impact on settlement cannot be assessed, the issue has been corrected. The potential impact has been assessed as low as this will wash out through the revision cycle.	
Actions taken to resolve the issue		Completion date
ICPs were corrected when breach identified		22/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
GIS system has been updated to automate all changes made at GXP level to ensure that all ICPs are updated		22/03/2021
		Cleared

Removal or breakage of seals		
Non-compliance	Description	
Audit Ref: 2.3 With:  From: 08-Apr-20 To: 30-Aug-21	Mainpower do not re-seal metering equipment after bridging and they do not advise the trader. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
MainPower staff no longer hold MEP authorization or capability to reseal. We advise MEPs of broken seals. We will resume advising traders as well.		06/12/21
Preventative actions taken to ensure no further issues will occur		Completion date
Network Operation Centre staff instructed to advise retailer of broken seals.		06/12/21
		Identified

Provision of information on dispute resolution scheme		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: 11.30A</p> <p>From: 01-Apr-20</p> <p>To: 31-Aug-21</p>	<p>Call scripts to be developed for use by Call Care to include the Utilities Dispute information.</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	
<b>Low</b>	<p>The controls are recorded as moderate because MainPower provide Utility Dispute information for all the internal customer facing channels, processes have not been established with their after-hours call centre provider.</p> <p>The audit risk rating is assessed as low as this being provided for all but one customer facing channel.</p>	
Actions taken to resolve the issue		Completion date
Customers calling MainPower after hours listen to the utilities disputes automated message, which contains information about making complaints and refers them to the website before being put through to call care.		01/04/21
Preventative actions taken to ensure no further issues will occur		Completion date
Customers calling MainPower after hours listen to the utilities disputes automated message, which contains information about making complaints and refers them to the website before being put through to call care.		01/04/21
		Identified

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-Apr-20</p> <p>To: 31-Aug-21</p>	<p>Late update to “ready” for nine ICPs electrically connected during the audit period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<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 affected a very small number of new connections with all being resolved within 13 days, one was back dated for unmetered streetlights.</p>	
Actions taken to resolve the issue		Completion date
These nine occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.		06/12/21
Preventative actions taken to ensure no further issues will occur		Completion date
These nine occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.		06/12/21
		Identified

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: 02-Apr-20</p> <p>To: 31-Aug-21</p>	<p>57 initial electrical connection dates updated late to the registry.</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	
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time, most initial electrical connection dates were populated on time.</p> <p>The audit risk rating is assessed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Majority of late updates is due to livening agents not responding within required timeframes. We have spoken with livening agents and will continue to monitor and take further action as required.		06/12/21
Preventative actions taken to ensure no further issues will occur		Completion date
Majority of late updates is due to livening agents not responding within required timeframes. We have spoken with livening agents and will continue to monitor and take further action as required		06/12/21
		Identified

Connection of ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 01-Apr-20</p> <p>To: 31-Aug-21</p>	<p>Eight ICPs where the trader was not recorded in the registry as having accepted responsibility prior to electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<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 most of the late updates were made within five days of being electrically connected.</p>	
Actions taken to resolve the issue		Completion date
These eight occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.		06/12/21
Preventative actions taken to ensure no further issues will occur		Completion date
These eight occurrences were caused by a number of different factors, all of which have been addressed at the time, including reminding livening agents of their obligations.		06/12/21
		Identified

Meter bridging		
Non-compliance	Description	
Audit Ref: 3.18 With: From: 08-Apr-20 To: 30-Aug-21	Mainpower do not advise the trader after bridging the meter. 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
MainPower used to advise the retailer but has been changed to advising the MEP, we will advise the Network Operation Centre to advise the retailer going forward.		06/12/21
Preventative actions taken to ensure no further issues will occur		Completion date
MainPower used to advise the retailer but has been changed to advising the MEP, we will advise the Network Operation Centre to advise the retailer going forward.		06/12/21
		Identified

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Apr-19 To: 31-Aug-21</p>	<p>205 late pricing updates.</p> <p>106 late address updates.</p> <p>16 late status updates.</p> <p>five late network updates.</p> <p>338 late NSP updates.</p> <p>Seven late distributed generation updates.</p> <p>Potential impact: Medium</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 because are sufficient to ensure that the registry is updated within three business days most of the time and the NSP changes process has been corrected.</p> <p>The audit risk rating is assessed to be low as the volume of late updates is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Refer comments on 2.3, 2.4, 3.4, 3.5, 3.6</p> <p>Process changes have been made to address NSP for ICP, and DG.</p> <p>Livening agents have been reminded of their obligations and to be monitored.</p>		06/12/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Refer comments on 2.3, 2.4, 3.4, 3.5, 3.6</p> <p>Process changes have been made to address NSP for ICP, and DG.</p> <p>Livening agents have been reminded of their obligations and to be monitored.</p>		06/12/21	



Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
Audit Ref: 4.6 With: 7(1) Schedule 11.1  From: 01-Apr-20 To: 31-Aug-21	338 ICPs with late NSP changes. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  The impact on settlement cannot be assessed, the issue has been corrected. The potential impact has been assessed as low as this will wash out through the revision cycle.	
Actions taken to resolve the issue		Completion date
ICPs were corrected when breach identified		22/03/2021
Preventative actions taken to ensure no further issues will occur		Completion date
GIS system has been updated to automate all changes made at GXP level to ensure that all ICPs are updated		22/03/2021
		Cleared

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) Schedule 11.1  From: 01-Apr-19 To: 31-Aug-21	Two late pricing changes to provide the actual price category code. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is recorded as low as the number of ICPs affected is small.	
Actions taken to resolve the issue		Completion date
Our usual practice is to not backdate; however, we will backdate a change in price category where the process has not been followed either by MainPower or another party and it is considered to be in the best interest of the customer		06/12/21
Preventative actions taken to ensure no further issues will occur		Completion date
Our usual practice is to not backdate; however, we will backdate a change in price category where the process has not been followed either by MainPower or another party and it is considered to be in the best interest of the customer		06/12/21
		Identified