

## Compliance plan for Electra– 2021

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1)  From: 01-Oct-20 To: 30-Sep-21	Inaccurate or missing information related to distributed generation, IECD, addresses, addresses recorded 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 exception tools are in place and appear to be effective. Historical information cleaning is occurring slowly. The day-to-day information is good. 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 have established a continual improvement process to resolve historic issues. Processes, procedures, and tools have been developed and progress is being made as resource availability allows.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electra have implemented a dedicated Service Desk solution to manage Registry related queries. This service desk solution ensures that communications are tracked and logged, processes are followed and emphasises adherence to SLA's As well Electra have implemented automated solutions to process registry reports and files. Discrepancies result in a request being automatically raised in the service desk for the team's attention. Significant improvement has been made but progress is slow due to small team size with conflicting priorities. We are confident that the increased systemisation and maturity in process will result in the resolution of this observation		October 2022	
Non-compliance	Description		

<p>Audit Ref: 2.2</p> <p>With: 11.2(2)</p> <p>From: 01-Oct-20</p> <p>To: 30-Sep-21</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>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls recorded as moderate as exception tools that are in place appear to be effective. Historical information cleaning is occurring slowly. The day-to-day information is good. The audit risk rating is assigned as low due to minimal impact on settlement outcomes.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>As noted above, Electra have established a continual improvement process to resolve historic issues. Processes, procedures, and tools have been developed and progress is being made as resource availability allows. We have reached a solution with the Authority for IECD and are actively progressing with this.</p>			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	

<p>Electra is in the process of developing a New Connection Request digital application. The application will enforce requesters to supply all data as required in the code. The requestor will be required to indicate an Electra Approved Livening Agent. The solution will send a notification to the Livening Agent advising them that they have been nominated by the requestor. A confirmation/return notification will also be sent to the requestor which will include the information they have submitted, and an advisory to that a notification has been sent to their indicated Livening Agent.</p> <p>The auditor has noted in the discussion thread <i>“Electra will set up a process and task that will involve checking their records followed by requesting any missing information from the retailer”</i>. A process already exists whereby when discrepancies are identified via our automated processes (where billing profile suggests DG but our records indicate an L code, no generation capacity, or fuel type etc), a request in our servicedesk is generated to address.</p>	<p>March 2022</p> <p>Completed</p>	
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Non-compliance	Description		
Audit Ref: 3.4 With: 7(2) of Schedule 11.1  From: 04-Nov-20 To: 30-Apr-21	9 ICPs did not have information loaded prior to electricity being traded at the ICP Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. New monitoring precludes loading an ICP with the status "New", it needs to be evaluated during next 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
This issue has now been resolved.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New monitoring process has shown this issue should not occur in the future.			

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Sep-21</p>	<p>92 ICPs (16.3%) electrically connected during the audit period did not have IECD populated in the registry at all</p> <p>70 ICPs (6.9%) had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event</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>The controls are rated as moderate. The new process of weekly monitoring the Audit Compliance Report helps to decrease number of late updates and not having IECD recorded at all. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Electra have been focussing on establishing automated reports and monitoring in place to prevent these issues. It is unfortunate that this small percentage have shown that, despite the significant improvement, more work needs to be done.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our new monitoring processes will assist to prevent future occurrences. There will always be some discrepancies due to some retailers using install dates rather than livening dates. To address this, we are developing a suite of digital solutions to optimise processes including onsite digital communications from livening agents and enhanced retailer communications.</p> <p>We have made corrections where they are an error made by us and investigate issues with traders and livening agents.</p>			

Non-compliance	Description		
Audit Ref: 3.13 With: 13 of Schedule 11.1 From: 01-Oct-20 To: 30-Sep-21	For 9 ICPs the status “NEW” was incorrectly managed Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. The company monitors the Audit Compliance report weekly to track non-compliances. The new monitoring precludes loading an ICP with the status “New”. 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
This issue has now been resolved.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New monitoring process has shown this issue should not occur in the future.			

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Oct-20 To: 30-Sep-21	Registry event updates backdated more than three business days (mostly prior April 2021) 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 some historical information clean-ups appear to have resulted in late updates. 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
Pricing – the majority were historic corrections. The price changes are driven by retailer requests. We are also aware that a Code change is forthcoming that will also assist to alleviate some noncompliance. Distributed Generation, we have demonstrated no late updates since February 21.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once historic corrections have been made, this accompanied with the new reporting, monitoring and Code change will see a significant improvement in all areas of updating the registry. As noted most backdated events occurred prior to April 2021 before our enhances reports and monitoring were implemented.			

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 01-Oct-20 To: 30-Sep-21	For 34 ICPs the address descriptions do not allow ICPs to be readily located Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong. The company monitors the Audit Compliance report weekly to track the progress of the historical information clean-up project, significant decrease in ICPs number. 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 are pleased with the improvements made in this area. A significant amount of work has gone into resolving address issues.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The remaining address issues are proving to be difficult examples. Work is continuing to investigate these and all should be resolved by the next audit if not before.			



Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Sep-21</p>	<ul style="list-style-type: none"> <li>15 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 6 UML ICPs information recorded by Electra but retailers do not submit volumes to RM</li> <li>IECD - No IECD for 90 ICPs in this audit period and no IECD for 447 historical ICPs</li> <li>Effective Date in the registry for DG installation (sample of 16 ICPs) is not representative of the date of CoC</li> </ul> <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 weekly monitoring introduced in June appears to be effective. Historical information clean-up is well advanced. 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>UML, in the cases of 15 ICPs where the retailer submits volume but we have not details, this is because we have not been advised of UML. We will investigate these and all the other anomalies. Clause 7(1)(m) does state if known. We do not therefore consider we are noncompliant for these.</p> <p>DG issue is not disputed and we accept noncompliance. This will be resolved going forward once our digital livening app is implemented.</p>			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Electra will investigate all instances whether we believe we are at fault or if the trader has not supplied correct information.</p>			