## Compliance Plan Aurora Energy Distributor 2023

| Provision of ICP Information to the registry   |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| Audit Ref: 3.3   | Eight ICPs did not have an initial electrical connection date populated.   |                 |                        |
| With: Clause 11.7  | Potential impact: Low  |                 |                        |
|  | Actual impact: Low   |                 |                        |
|  | Audit history: Once  |                 |                        |
| From: 01-Feb-22  | Controls: Strong   |                 |                        |
| To: 31-Jan-23  | Breach risk rating: 1  |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| Low  | The controls are recorded as strong as Aurora have sufficient reporting in place to identify this, and there has been a significant improvement during the audit period. |                 |                        |
|  | The audit impact is assessed to be low due to the number of ICPs with no initial electrical connection date recorded.  |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| Aurora has corrected the ICPs with no IECD.  |  | 5 May 2023      | Identified             |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
| Aurora Energy has implemented an internal compliance report that is monitored monthly. Most non-compliance issues are corrected immediately. |  | 5 May 2023      |                        |

| Timeliness of Provision of ICP Information to the registry                          |  |                    |                        |
|---|--|--------------------|------------------------|
| Non-compliance  | Description  |                    |                        |
| Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1                                   | Late update to "ready" for six of a sample of 10 ICPs electrically connected during the audit period.  Potential impact: Medium  Actual impact: Medium |                    |                        |
| From: 01-Feb-22   | Audit history: Multiple times previously   |                    |                        |
| To: 31-Jan-23   | Controls: Strong   |                    |                        |
|   | Breach risk rating: 1  |                    |                        |
| Audit risk rating   | Rationale for audit risk rating  |                    |                        |
| Low   | The controls are recorded as strong as Aurora  |                    |                        |
|   | The audit impact is assessed to be low due to the small number of late updates.  |                    |                        |
| Actions taken to resolve the issue  |  | Completion<br>date | Remedial action status |
| The affected ICPs have been corrected.  |  | 5 May 2023         | Identified             |
| Preventative actions taken to ensure no further issues will occur                   |  | Completion date    |                        |
| Internal compliance is performed monthly to minimise the instances of late updates. |  | 5 May 2023         |                        |

| Timeliness of Provision of Initial electrical connection Date  |   |                 |                        |
|--|---|-----------------|------------------------|
| Non-compliance   | Description   |                 |                        |
| Audit Ref: 3.5   | 263 late initial electrical connection date updates.  |                 |                        |
| With: Clause 7(2A) of  | Potential impact: Low   |                 |                        |
| Schedule 11.1  | Actual impact: Low  |                 |                        |
|  | Audit history: Multiple times previously  |                 |                        |
| From: 01-Feb-22  | Controls: Moderate  |                 |                        |
| To: 31-Jan-23  | Breach risk rating: 2   |                 |                        |
| Audit risk rating  | Rationale for audit risk rating   |                 |                        |
| Low  | The controls are recorded as moderate as Aurora have sufficient reporting in place to identify this, but there is still an opportunity to improve the return of paperwork from the field. |                 |                        |
|  | The audit risk rating is assessed to be low as this has no direct impact on reconciliation.   |                 |                        |
| Actions taken to resolve the issue   |   | Completion date | Remedial action status |
| Aurora has corrected the affected ICPs   |   | 5 May 2023      | Identified             |
| Preventative actions taken to ensure no further issues will occur  |   | Completion date |                        |
| Reporting is in place to identify issues; however, compliance is dependent on the provision of information from third parties. |   | 5 May 2023      |                        |

| Temporary electrical connection of ICP that is not an NSP   |   |                       |                        |  |
|---|---|-----------------------|------------------------|--|
| Non-compliance  | Description   |                       |                        |  |
| Audit Ref: 3.8  | Eight ICPs of a sample of ten temporarily livened.  |                       |                        |  |
| With: Clause 10.31A   | Potential impact: Low   | Potential impact: Low |                        |  |
|   | Actual impact: Low  |                       |                        |  |
|   | Audit history: None   |                       |                        |  |
| From: 01-Feb-22   | Controls: Moderate  |                       |                        |  |
| To: 31-Jan-23   | Breach risk rating: 2   |                       |                        |  |
| Audit risk rating   | Rationale for audit risk rating   |                       |                        |  |
| Low   | Controls are rated as moderate as they will mitigate risk most of the time but there is an opportunity for improvement. |                       |                        |  |
|   | The audit risk rating is assessed to be low as this has no direct impact on reconciliation.                             |                       |                        |  |
| Actions taken to resolve the issue  |   | Completion date       | Remedial action status |  |
| No further action required  |   | 5 May 2023            | Identified             |  |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date       |                        |  |
| Aurora will remind and educate contractors of the correct process to maintain compliance with clause 10.31A |   | 31 July 2023          |                        |  |

| Changes to registry information  |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| Audit Ref: 4.1   | Updates to registry backdated greater than three business days.  |                 |                        |
| With: Clause 8 Schedule  | 190 late pricing updates.  |                 |                        |
| 11.1   | 328 late address updates.  |                 |                        |
|  |  |                 |                        |
| 36 late network updates.   |  |                 |                        |
|  | 171 late distributed generation updates.   |                 |                        |
|  | Potential impact: Low  |                 |                        |
|  | Actual impact: Low   |                 |                        |
|  | Audit history: Multiple times previously   |                 |                        |
| From: 01-Feb-22  | Controls: Moderate   |                 |                        |
| To: 31-Jan-23  | Breach risk rating: 2  |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| Low  | The controls are rated as moderate. Aurora has robust reporting in place which identifies discrepancies which ensures that discrepancies are identified but some errors still occur. |                 |                        |
|  | The Audit risk rating is low as the majority of the changes have no impact on reconciliation.  |                 |                        |
| Actions to   | aken to resolve the issue  | Completion date | Remedial action status |
| Aurora backdates network pricing events where information that leads to a change in price category or pricing attribute has not been provided or has not been provided on time by a contractor. It would be disadvantageous to consumers to comply with this requirement in circumstances where Aurora has not applied altered pricing information in error, or where contractors have not provided Aurora information in a timely fashion.  Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information. |  | 5 May 2023      | Identified             |

| Notice of NSP for each ICP   |   |                   |                        |
|--|---|-------------------|------------------------|
| Non-compliance   | Description   |                   |                        |
| Audit Ref: 4.2   | Three ICPs with the incorrect GXP recorded.   |                   |                        |
| With: Clauses 7(1),(4)   |   |                   |                        |
| and (5) Schedule 11.1  | Actual impact: Low  |                   |                        |
|  | Audit history: None   |                   |                        |
| From: 01-Feb-22  | Controls: Moderate  |                   |                        |
| To: 31-Jan-23  | Breach risk rating: 2   |                   |                        |
| Audit risk rating  | Rationale for   | audit risk rating |                        |
| Low  | Controls are rated as moderate as they will mitigate risk most of the time but there is an opportunity for improvement. |                   |                        |
|  | The audit risk rating is assessed to be low as it only impacted three ICPs.   |                   |                        |
| Actions taken to resolve the issue   |   | Completion date   | Remedial action status |
| Incorrect ICPs have been corrected   |   | 5 May 2023        | Identified             |
| Preventative actions taken to ensure no further issues will occur  |   | Completion date   |                        |
| Aurora maintains a monthly internal compliance report that identifies non-compliance issues which are corrected immediately. |   | 31 July 2023      |                        |
| Staff will be educated and reminded about the process to correctly enter GXP details.  |   |                   |                        |

| ICP location address   |   |                   |                        |
|--|---|-------------------|------------------------|
| Non-compliance   | Description   |                   |                        |
| Audit Ref: 4.4   | Nine ICPs with duplicate addresses and 1,511 ICPs with insufficient details.  |                   |                        |
| With: Clause 2 of  | Potential impact: Low   |                   |                        |
| Schedule 11.1  | Actual impact: Low  |                   |                        |
|  | Audit history: Three times previously   |                   |                        |
| From: 01-Feb-22  | Controls: Moderate  |                   |                        |
| To: 31-Jan-23  | Breach risk rating: 2   |                   |                        |
| Audit risk rating  | Rationale for   | audit risk rating |                        |
| Low  | Controls are rated as moderate as they will mitigate risk most of the time but there is an opportunity for improvement.                 |                   |                        |
|  | The audit risk rating is low as this has no direct impact on reconciliation but could affect meter readers ability to get manual reads. |                   |                        |
| Actions taken to resolve the issue   |   | Completion date   | Remedial action status |
| Non-compliant ICPs have been corrected.  |   | 5 May 2023        | Identified             |
| Preventative actions taken to ensure no further issues will occur  |   | Completion date   |                        |
| Aurora maintains an internal compliance report which identifies most issues of non-compliance which are corrected immediately. |   | 5 May 2023.       |                        |
| However, this process is reliant on councils accurately maintaining their GIS data, so potential errors may still occur.       |   |                   |                        |

| Distributors to Provide ICP Information to the Registry   |  |                 |                              |
|---|--|-----------------|------------------------------|
| Non-compliance  | Description  |                 |                              |
| Audit Ref: 4.6  | Eight ICPs with missing initial electrical connection dates.   |                 |                              |
| With: Clause 7(1)(I)&(p)  | Ten active ICPs with Initial electrical connection dates inconsistent with other fields.                                 |                 |                              |
| of Schedule 11.1  | NSP dedication flag incorrect for two LE   | ICPs.           |                              |
|   | Potential impact: Low  |                 |                              |
|   | Actual impact: Low   |                 |                              |
| 5 04 5 1 00   | Audit history: Multiple times  |                 |                              |
| From: 01-Feb-22   | Controls: Moderate   |                 |                              |
| To: 31-Jan-23   | Breach risk rating: 2  |                 |                              |
| Audit risk rating   | Rationale for audit risk rating  |                 |                              |
| Low   | Controls are rated as moderate. There is reporting in place to identify discrepancies but there is room for improvement. |                 | e to identify discrepancies  |
|   | The audit risk rating is low as the errors found have a minor effect on reconciliation                                   |                 | or effect on reconciliation. |
| Actions taken to resolve the issue  |  | Completion date | Remedial action status       |
| Non-compliant ICPs have been corrected.   |  | 5 May 2023      | Identified                   |
| Preventative actions taken to ensure no further issues will occur   |  | Completion date |                              |
| Aurora performs a monthly internal control process to identify and correct most errors. Staff reminders and education will be performed to improve the process. |  | 31 July 2023.   |                              |