

Compliance plan for Electra– 2023

Non-compliance	Description		
<p>Audit Ref: 2.1 With: 11.2(1)</p> <p>From: 01-Oct-21 To: 15-Jan-23</p>	<p>Inaccurate or missing information related to distributed generation, IECD, addresses, addresses recorded in the registry</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 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.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Continually working to resolve IECD issues, livening app is working well when the livening agent is an approved contractor. When it isn't the followup process is difficult and time consuming.</p> <p>Electra have updated some of this information, with the addresses taking longer due to the difficult nature of finding them.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Electra has processes in place to ensure that new ICPs are readily locatable, and not duplicate. We have a livening process that works well with our approved livening agents. DG types are always difficult as our process requires the installer to notify us once installed. If this doesn't happen there is time and effort required to update the information.</p>			

Non-compliance	Description		
Audit Ref: 2.2 With: 11.2(2) From: 01-Oct-21 To: 15-Jan-23	Incorrect or missing historical information in the registry across a number of areas. 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 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.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continually working to resolve IECD issues, livening app is working well when the livening agent is an approved contractor. When it isn't the followup process is difficult and time consuming. Electra have updated some of this information, with the addresses taking longer due to the difficult nature of finding them.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes in place to track the non compliances and we do our best endeavour to fix them as soon as we know about them.			

Non-compliance	Description	
<p>Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Oct-21 To: 15-Jan-23</p>	<p>81 ICPs (3.3%) electrically connected installations during the audit period did not have IECD populated in the registry; One ICP (historic, prior 2021) does not have IECD populated</p> <p>622 ICPs, including historic ICPs, had the Initial Electrical Connection Date (IECD) populated in the registry more than 10 days after the event</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are rated as moderate. The new process of weekly monitoring the Audit Compliance Report helps to decrease the 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>Historic ICPs have been updated were required. Some are already decommissioned, obtaining a livening date seems a pointless exercise.</p>		<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Electra have a livening app for approved livening agents to notify us. Unfortunately, not all livenings are completed by these contractors. Electra frequently have discussions with retailers re their proposed livening agent and who actually livened. This is an ongoing problem and will need worked through with retailers and livening agents.</p>		

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 01-Oct-21 To: 15-Jan-23	Registry event (address, distributed generation, decommissioning) updates backdated more than three business days 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
Cannot be resolved			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
When entering address information we will use the current date for data entry. This will ensure non compliance.			

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 01-Oct-21 To: 15-Jan-23	For 24 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. 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
The remaining ICPS with non readily locatable addresses are very difficult to track down. Electra will try and determine these over the coming months.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All new ICP applications are checked for a valid address before being issued. This issue should not occur again for new ICPs.			

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Oct-21</p> <p>To: 15-Jan-23</p>	<ul style="list-style-type: none"> • 6 UML ICPs for which traders submit volume to the RM but Electra does not have any information in the registry and 1 UML ICP information recorded by Electra but retailers do not submit volumes to RM • Effective Date in the registry for DG installation (sample of 20 ICPs) is not representative of the date of CoC • Incorrect Dedicated flag for 5 “LE” ICPs • Incorrect installation flag “L” for 3 ICPs • No IECD for 81 ICPs electrically connected during this audit period • No IECD for one ICP (historical, prior 2021) <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		
<p>Low</p>	<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 ICPs have been modified to include UML codes.</p> <p>DG codes have been updated</p>			<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Process looked into so that when DG removed the correct codes get updated in the registry.</p> <p>Electra have a livening app for approved livening agents to notify us. Unfortunately, not all livenings are completed by these contractors. Electra frequently have discussions with retailers re their proposed livening agent and who actually lived. This is an ongoing problem and will need worked through with retailers and livening agents.</p>			