

## Compliance plan for Orion Distributor 2023

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1)  From: 01-May-22 To: 30-Apr-23	Incorrect event date applied to registry for the initial electrical connection date update for seven ICPs. Examples of incorrect information in sections 3.3, 4.2, 4.6 and 7.1. Potential impact: Low Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level. There is no impact to the market therefore I have rated the audit risk rating as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion has a strong process in place with minor errors, mainly due to human error which are corrected where these have been identified	14/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
With no further preventative action	14/08/2023	

Provision of ICP Information to the registry		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7  From: 16-May-22 To: 30-Jul-23	Two ICPs without IECDs populated. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because validation is in place to identify where the trader has changed the ICP to "active" but where the IECD has not been provided by the living agent.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion has a strong process in place with minor errors, mainly due to human error which are corrected where these have been identified	14/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further preventative action	14/08/2023	

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-May-22 To: 30-Apr-23	Ten ICPs changed to “ready” after electrical connection. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Adjust the automated registry update process so that the IECD and the event date is the same.	14/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above – reported to our IS Helpdesk	14/08/2023	

Timeliness of Provision of Initial electrical connection Date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1  From: 01-May-22 To: 30-Apr-23	457 late updates of the initial electrical connection date.  Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level.  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
Adjust the automated registry update process so that the IECD and the event date is the same	31/8/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	31/8/2023	

Connection of ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17  From: 01-May-22 To: 30-Apr-23	Ten ICPs electrically connected prior to a trader being recorded as having accepted responsibility.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level.  The audit risk rating is assessed to be low as this affected only ten ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion has a strong process in place with minor errors from human error. These are quickly corrected when identified,	14/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further preventative action required	14/08/2023	

<b>Meter bridging</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.18 With: Clause 10.33C  From: 01-May-22 To: 30-Jul-23	Approval from trader not always gained when meters are bridged. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as strong as traders are always notified of bridging. The audit risk rating is assessed to be low as the volume of bridged meters is small and therefore the potential impact of reconciliation is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
In all cases the retailer is notified that bridging has occurred to reconnect the customer as soon as practically possible	14/8/2023	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
No further preventative action required	14/8/2023	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 01-May-22 To: 30-Apr-23	Updates to registry backdated greater than three business days of the event. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong. Orion has robust checks and processes in place to ensure wherever possible events are updated to the registry as soon as possible.  The audit risk rating is low as the volume of backdated events is small and those backdated have little to no impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Orion has strong controls in place. Some notification activities rely on the timeliness of third parties which can impact our level of compliance. Orion's NSP update process is automated. Manual intervention is required where backdating needs to be done to address NSP changes in the timeline		14/8/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We do not intend taking further preventative action		14/8/2023	

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1  From: 17-Feb-23 To: 01-Jun-23	One incorrectly recorded NSP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level and have recently been strengthened to include a manual check for each new ICP.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The ICP was linked incorrectly, now resolved. Confirmed in the ADMS 9-8-23 that this ICP is now correctly linked to BRY0661 via dist Tx Parnwell St - C147/30. The registry has been updated with the correct GXP	14/8/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action required	14/8/2023	



<b>Distributors to Provide ICP Information to the Registry</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 4.6  With: Clause 7(1)  Schedule 11.1</p> <p>From: 01-May-22  To: 30-Apr-23</p>	<p>Six initial electrical connection dates recorded in error.  Two ICPs with a blank initial electrical connection date.  One ICP with incorrect distributor unmetered load recorded.</p> <p>Potential impact: Low  Actual impact: Low  Audit history: Three times  Controls: Strong  Breach risk rating: 1</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as strong as Orion have robust reporting and processes in place to identify potential discrepancies and any found are corrected.</p> <p>There is no impact on settlement in relation to the incorrect registry information; therefore, I have recorded the audit risk rating as low.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Information will be corrected in the registry as it becomes available	14/8/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Orion contacts and discusses this with third parties to align the registry data as an ongoing activity.	14/8/2023	

Notification of shared unmetered load ICP list		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 11.14(2) and (4)</p> <p>From: 14-Oct-14</p> <p>To: 30-Jul-23</p>	<p>Unmetered load recorded as shared unmetered load when it should be recorded as standard unmetered load and the SI ICPs be decommissioned.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</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 recorded as strong, as Orion has robust checks in place. All four instances are exceptions to the normal process, not helped by the anomaly in the Code allowing traders to "opt out".</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion will update and make the necessary corrections after discussion with the customer or trader	14/8/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No additional preventative action is planned as new shared unmetered load has been discontinued	14/8/2023	