

Compliance plan for Aurora - 2017

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 25-May-17</p> <p>To: 31-Jul-17</p>	<p>Late update to Ready for one ICP.</p> <p>Potential impact: Medium</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	
Low	<p>The controls are recorded as Moderate because an improvement can be made to ensure this example is identified.</p> <p>There is no impact on settlement. The impact is that the trader could not change their status to Active and there may have been an ICP days discrepancy. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>A staff member updated the status of the ICP from “New” to “Ready” incorrectly in Aurora’s billing and connection management software. This resulted in the “Ready” status not being communicated to the Registry.</p> <p>As this issue was identified during the audit, it has now been corrected.</p>		31 July 2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Aurora has a monthly reconciliation process to identify discrepancies between installation statuses in its billing and connection management system and the Registry. However the reconciliation process will typically concentrate on discrepancies between inactive and active statuses, not inconsistencies between two different inactive statuses (which is the case in this example).</p> <p>Aurora will expand the reconciliation process in order to review the inconsistencies within separate inactive statuses.</p>		September 2017
		Identified

Timeliness of Provision of Initial Energisation Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 21-Oct-16</p> <p>To: 13-Jun-17</p>	<p>10 late initial energisation date updates.</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	
Low	<p>Aurora has reporting in place to ensure initial energisation dates are provided by contractors in a timely manner. I consider the controls are strong and the late updates reflect a small percentage of the total number of updates.</p> <p>There is no impact on settlement. The only potential impact is where a trader may wish to compare their Active date to the IED, so the impact is considered minor, leading to an audit risk rating of low.</p>	
Actions taken to resolve the issue		Completion date
<p>The late initial energisation date updates are either a result of staff errors (information provided but not updated), or late notification of livening reports provided by Authorised Network Inspectors (ANIs).</p> <p>Where the information was not updated due to a staff error, the dates were updated when it was identified during the monthly reconciliation process, that an ICP in an Active status with a livening report received from an ANI, has no IED stated.</p> <p>For late notification of livening reports by ANIs, the IED has been inputted when Aurora has received the information from the ANI.</p>		No change
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The number of late initial energisation date updates constitute around 0.5% of all IED updates made during the event detail report period.</p> <p>Given it has no impact on settlement, and the small window available to ensure compliance, Aurora does not believe additional measures are required to the monthly reconciliation process.</p>		No change
		Identified

Monitoring of “new” & “ready” statuses		
Non-compliance	Description	
Audit Ref: 3.13 With: Clause 15 Schedule 11.1 From: 01-Aug-15 To: 31-Jul-17	Traders not notified of ICPs at new or ready for more than 24 months. Potential impact: Medium Actual impact: Low Audit history: Once Controls: None Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Aurora does not have a process in place to manage compliance with this clause. There is a potential impact on settlement, in cases where traders do not have the relevant ICPs set up in their systems, so the impact is rated as minor, leading to an audit risk rating of low.	
Actions taken to resolve the issue		Completion date
Aurora will on a 6-monthly basis identify the ICPs that have been in a “New” or “Ready” Status for 24 months or longer. Aurora will then contact the electrician for each ICP (which is stated on the original connection application) and decommission any ICPs where the electrician states that the ICP is no longer required. Aurora will then advise each trader of the outcome of this process, identifying the ICPs that are still required by the electrician, and the ICPs that Aurora decommissioned.		October 2017
Preventative actions taken to ensure no further issues will occur		Completion date
See above.		See above
		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-Aug-16</p> <p>To: 31-Jul-17</p>	<p>Updates to registry backdated greater than 3 business days of 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>Many of the late updates were as a result of late information from other parties, however four of a sample of 10 backdated price category codes were due to data entry errors, therefore I have recorded the controls as moderate.</p> <p>There is a minor impact on line charge billing where errors were in place. There would be a negative impact on traders and customers if Aurora did not backdate pricing events. The Audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>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.</p> <p>Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information.</p>		No change
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information.</p>		No change
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clause 7(1)(b) of Schedule 11.1</p> <p>From: 16-Dec-13</p> <p>To: 31-Jul-17</p>	<p>Four ICPs with incorrect NSPs.</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	
Low	<p>Controls are in place to ensure ICPs are allocated to the correct NSP for new connections. The validation report appears to need some change because these four were not identified.</p> <p>There is a minor impact on settlement. The NSPs in question are in different balancing areas. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Aurora performs a monthly reconciliation of the NSPs assigned to ICPs. In this case these ICPs were identified as having an incorrect NSP assigned, but due to the effective date being applied for the correction in Aurora's billing and connection management system, the corrections were not reflected on the Registry as they were not the latest event.</p> <p>Staff will be reminded of the importance of checking the Registry when correcting errors (such as NSP corrections) to ensure the Registry is displaying the correct information.</p>		26 July 2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Aurora's monthly reconciliation of NSP information will be expanded to ensure any discrepancies between the NSP in Aurora's billing and connection management system and the Registry are investigated and resolved.</p>		September 2017
		Cleared

Distributors to Provide ICP Information to the Registry		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(k)&(p) of Schedule 11.1</p> <p>From: 19-Aug-15</p> <p>To: 09-Aug-17</p>	<p>Four ICPs with incorrect IED or status.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Reporting is in place to identify errors but changes may be required to identify the issues mentioned above.</p> <p>There is potentially a minor impact on settlement for the ICP at new instead of ready. The trader was prevented from updating to Active for this ICP. The other points are unlikely to have had an impact on other participants. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The four ICPs with incorrect IED or status were identified during the audit and have been corrected.		August 2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Aurora will review the monthly reconciliation process to ensure that ICPs without IEDs and an Active status, and ICPs with inconsistent statuses between Aurora's billing and connection management system are identified and resolved.</p> <p>Staff will be reminded of the importance of correctly decommissioning ICPs when a livening report states that an ICP has been decommissioned.</p>		September 2017
		Identified

Provision of information to registry after the trading of electricity at the ICP commences		
Non-compliance	Description	
<p>Audit Ref: 4.7</p> <p>With: Clause 7(3) of Schedule 11.1</p> <p>From: 07-Feb-17</p> <p>To: 23-Jun-17</p>	<p>13 ICPs with price category codes updated later than 10 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Price category codes are based on information provided by traders or their agents. Changes are only made if notification is received that the data is incorrect. Controls are recorded as strong.</p> <p>There is potentially a minor impact on traders because line charge invoicing and customer invoicing will need to be corrected for some ICPs. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>The late pricing code updates are either a result of staff errors (information provided but not updated), or late notification of livening reports provided by Authorised Network Inspectors (ANIs).</p> <p>Where the information was not updated due to a staff error, the pricing code was updated when it was identified during the monthly reconciliation process.</p> <p>For late notification of livening reports by ANIs, the pricing code has been inputted when Aurora has received the information from the ANI.</p>		No change
Preventative actions taken to ensure no further issues will occur		Completion date
Aurora will continue to perform the monthly reconciliation process to identify missing or inconsistent information.		No change
		Identified

Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 20 of Schedule 11.1</p> <p>From: 19-Aug-15</p> <p>To: 09-Aug-17</p>	<p>One ICP not updated to decommissioned.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are in place to manage the decommissioning process and only one ICP had the incorrect status; therefore the controls are rated as strong.</p> <p>There is no impact on settlement or other parties; therefore the audit risk rating is minor.</p>	
Actions taken to resolve the issue		Completion date
The ICP mentioned above was identified during the audit process, so has now been correctly reflected as being Decommissioned on the Registry.		9 August 2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Aurora will review ICPs set at the “Ready to Decommission” status in the Delta Inspectors database, to ensure that there are no data entry issues holding up notification of a physical decommissioning.</p> <p>For independent (non-Delta) ANIs, Aurora will directly query “Ready to Decommission” status ICPs if no decommissioning livening report has been provided.</p>		September 2017
		Cleared

Responsibility for metering information for NSP that is not a POC to the grid			
Non-compliance	Description		
Audit Ref: 6.8 With: Clause 10.25(3) of Part 10 From: 05-Feb-17 To: 14-Aug-17	RM not notified of certification date for Heritage Estate. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls did not appear to identify this issue; therefore they are recorded as weak. There is no impact on settlement or other parties because the metering is certified; therefore the audit risk rating is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Aurora has notified the Reconciliation Manager of the new certification expiry date (14/4/2020) for the Heritage Estate NSP (HER0111).		17 August 2017	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The MEP for the NSP (Vector/AMS) has stated that they will forward on any future metering certification renewal information to Aurora. This update will alert Aurora to update the Reconciliation Manager.		5 September 2017	