

Compliance plan for Electra

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 16-Aug-17 To: 15-Apr-18	Some information in the registry still must be corrected or populated 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	We recorded controls as moderate. The level of compliance has improved since the last audit, the company is working towards improving the quality of information. Audit risk rating is assessed as low because Electra pursue data correction. Minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Address correction an ongoing issue requiring potential site visits to correct.		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All new ICPs are entered with a unique locatable address, all address issues are historic		ongoing	

Non-compliance	Description		
<p>Audit Ref: 2.2 With: 11.2(2)</p> <p>From: 16-Aug-17 To: 15-Apr-18</p>	<p>Incorrect data is corrected but, in some cases, it is identified late and results in backdating transactions in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate because some processes are not fully developed. The electronic interface to the registry improved the quality of data. Audit risk rating is recorded as low because there is a minor impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Data already corrected		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
More emphasis placed on entering data correctly initially to save correcting it.		ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 16-Aug-17</p> <p>To: 15-Apr-18</p>	<p>The Initial Electrical Connection Date was not recorded before 10 business days in the registry for 215 (88.8%) new connection ICPs, created since the last audit</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 are recorded as moderate. Electra has changed the process and from 1/4/18, Electra requested contractors working on their network to notify them of any new connections being electrically connected. They also added a new field to WindMil to record the Initial Electrical Connection Date. The next audit should confirm that the new processes are working well.</p> <p>Population of Initial Electrical Connection date does not have any direct impact on settlement outcomes therefore audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Updating IED			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contractors to email weekly all properties livened and date livened to allow us to populate IED in the correct timeframes.		ongoing	

Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1 From: 16-Aug-17 To: 15-Apr-18	Some updates to network, pricing information were done later than 3BD Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as weak because up to the audit there was no well-defined process for updating the registry information. Changes to WindMil should improve the level of compliance but management of pricing updates and manual updates to the registry are weak points. Impact on settlement outcomes is minor therefore audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Cannot resolve actions complete.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Updating will continue as requested by the retailers.		ongoing	

Non-compliance	Description		
Audit Ref: 4.2 With: 7(4) of Schedule 11.1 From: 16-Aug-17 To: 15-Apr-18	22 ICPs had incorrect NSP assigned Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because additional enhancement are required to validate correct NSP assigned to new ICPs. Electra has only two NSPs which are not interconnected. Audit risk rating recorded as low because all errors were corrected. No impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
NSPs updated to be correct			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Correct NSP entered on ICP creation		ongoing	

Non-compliance	Description		
Audit Ref: 4.4 With: 2 of Schedule 11.1 From: 16-Aug-17 To: 15-Apr-18	For 469 ICPs the address descriptions do not allow ICPs to be readily located Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak, the addresses are corrected as an operator comes across them, but it is not a structured project. No impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Manually try and resolve addresses of ICPs		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Manually try and resolve addresses of ICPs. These are all historical ICPs and can be time consuming.		ongoing	

Non-compliance	Description		
Audit Ref: 4.6 With: 7(1) of Schedule 11.1 From: 16-Aug-17 To: 15-Apr-18	Incorrect or missing information in the registry for UML, Initial Electrical Connection Date, NSPs Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because there are some improvement which should be made to them. The audit risk is recorded as low because the impact on settlement outcomes is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
IED corrected, NSP corrected		May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
UML will take time and potential site visits to correct		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: 20 of Schedule 11.1</p> <p>From: 16-Aug-17</p> <p>To: 15-Apr-18</p>	<p>The date of notification from trader of decommissioning is used as an event date instead an actual date when equipment was physically removed.</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	The controls are recorded as weak, the addresses are corrected as an operator comes across them, but it is not a structured project. No impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Non, decommission already occurred			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Date of last event will be used for decommissioning date, not the day the registry was updated.		ongoing	