

Compliance plan for Aurora – 2018

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: 17-Jan-18</p> <p>To: 22-Jun-18</p>	<p>Late update to Ready for eight ICPs.</p> <p>Potential impact: Medium</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>The controls are recorded as Moderate because they mitigate risk most of the time.</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
The issue identified relates to the late notification of historic events, so no further action is required.		N/A
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 as this is a monthly check, resolving the discrepancies will likely cause a late update to the Registry.</p> <p>Aurora is planning to review the way it gathers information from the field, and the contract mechanisms it has in place with field information providers, to ensure accurate information is provided in a timely fashion.</p>		June 2019
		Identified

Timeliness of Provision of Initial electrical connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 30-Jun-18</p>	<p>16 late initial electrical connection date updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Aurora has reporting in place to ensure initial electrical connection dates are provided by contractors in a timely manner; however, the effectiveness of the controls has reduced compared to the previous audit, therefore I've recorded them as moderate.</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 IECD, so the impact is considered minor, leading to an audit risk rating of low.</p>	
Actions taken to resolve the issue		Completion date
The issue identified relates to the late notification of historic events, so no further action is required.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
Aurora is planning to review the way it gathers information from the field, and the contract mechanisms it has in place with field information providers, to ensure accurate information is provided in a timely fashion.		June 2019
		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 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 two of a sample of 10 backdated price category codes and one of a sample of 10 network events 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
Aurora is mindful of this Code requirement and limits any backdating to corrections of pricing information.		No change
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clause 7(1)(b) of Schedule 11.1 From: 16-Jul-13 To: 31-Jul-18	Two ICPs with incorrect NSPs. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are in place to ensure ICPs are allocated to the correct NSP for new connections. There is a minor impact on settlement. The NSPs in question are in the same balancing area. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The two ICPs with incorrect NSPs have been corrected as part of the audit.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As stated in the audit commentary, <i>"The controls in place to ensure new ICPs have the correct NSP are robust, with the NSP being assigned at the time the ICP is plotted in the GIS"</i>		No change
		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: 01-Jul-17</p> <p>To: 30-Jun-17</p>	<p>18 ICPs with incorrect IECD or status.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 other participants. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The ICPs with incorrect IED or statuses were identified during the audit and have been corrected.		Completed
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>Aurora is planning to review the way it gathers information from the field, and the contract mechanisms it has in place with field information providers, to ensure accurate information is provided in a timely fashion.</p>		June 2019
		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: 01-Dec-17</p> <p>To: 30-Jun-18</p>	<p>11 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: Once</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
The issue identified relates to the late notification of historic events, so no further action is required.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Aurora will continue to perform the monthly reconciliation process to identify missing or inconsistent information.</p> <p>Aurora is planning to review the way it gathers information from the field, and the contract mechanisms it has in place with field information providers, to ensure accurate information is provided in a timely fashion.</p>		No change
		Identified

Management of “decommissioned” status		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 20 of Schedule 11.1 From: 05-Jul-18 To: 20-Aug-18	Five ICPs not updated to decommissioned. 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 are in place to manage the decommissioning process and the five ICPs not updated have now been resolved, therefore the controls are rated as strong. There is no impact on settlement or other parties, therefore the audit risk rating is minor.	
Actions taken to resolve the issue		Completion date
The ICPs that had not been decommissioned were identified during the audit and have been corrected.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Staff will be reminded of the importance of processing information from the field information providers.		September 2018
		Identified