

# Compliance plan for Pulse Energy Alliance LP material change audit 2019

<b>Title: Audit trails</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.4 With: Clause 21 Schedule 15.2  From: 18-Mar-19 To: 18-Mar-19	The RM tool audit trails do not record the operator identifier for the person who completed the activity; there is only one operator identifier for the RM tool.  Potential impact: Low  Actual impact: Low  Audit history: Twice  Controls: Strong  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong and the impact as low. Audit trails are available and contain the required information, but the person who processed the change is not identifiable within the audit trail because there is only one operator identifier.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
JCC has implemented the new format of Audit Trail as required. Currently the RM tool audit trails successfully record the operator identifier for the person who completes the activity. Each user is identified by their own individual Windows Username Login.	Completed	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
JCC has resolved the issue and provided a permanent solution. PAYGO system also has the in-built Audit trails from the beginning and is an integral part of system for Trader Updates.	Completed	

<b>Title: Losing trader must provide final information - standard switch</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3  From: 18-Mar-19 To: 18-Mar-19	The CS creation process does not ensure that estimated daily consumption is correct.  Potential impact: Low Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as weak. Based on the testing and information provided they are not sufficient to ensure that CS content will consistently be correct.  The impact is assessed to be low. As a new retailer, large numbers of outgoing CS files are not expected.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The CS daily consumption field is currently summing the individual daily consumption of the last 7 billed reads (actual and estimate) and then dividing this by 7 to get an average daily consumption. Based on feedback from the EA and the auditor we will be putting in a request to have this amended to only use the latest two validated actual readings.	Identified	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We are escalating the change request above and anticipate that due to initial low volumes of switching the change will be implemented quite quickly post launch to ensure minimal impact.	In progress	

<b>Title: Losing trader must provide final information - switch move</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3  From: 18-Mar-19 To: 18-Mar-19	The CS creation process does not ensure that estimated daily consumption is correct.  Potential impact: Low Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as weak. Based on the testing and information provided they are not sufficient to ensure that CS content will consistently be correct.  The impact is assessed to be low. As a new retailer, large numbers of outgoing CS files are not expected.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The CS daily consumption field is currently summing the individual daily consumption of the last 7 billed reads (actual and estimate) and then dividing this by 7 to get an average daily consumption. Based on feedback from the EA and the auditor we will be putting in a request to have this amended to only use the latest two validated actual readings.	Identified	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We are escalating the change request above and anticipate that due to initial low volumes of switching the change will be implemented quite quickly post launch to ensure minimal impact.	In progress	