

Compliance plan for Aurora Energy Distributor– 2020

Provision of registry information		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 02-Jul-18 To: 26-Feb-20	Late update to Ready for 497 (22%) of ICPs electrically connected during the audit period. Potential impact: Medium Actual impact: Medium Audit history: Three times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as moderate as Aurora have sufficient reporting in place to identify this, but due to resource constraints and an increase in the number of contractors approved to work on the network, the volume of late updates has increased. The audit impact is assessed to be medium due to the volume of late updates which prevents the trader from making these ICPs active.	
Actions taken to resolve the issue	Completion date	Remedial action status
The issue identified relates to the late notification of historic events, so no further action is required.	N/A	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Aurora Energy 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. Aurora Energy will investigate a change in the New Connection process to streamline ICP creation, where practicable. this may involve creating new ICPs in 'Ready' status when it is evident that no construction work is required, removing the need for contractors to notify when the network is ready to connect to.	31 Dec 2020	

Population of IECD			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Dec-17 To: 30-Jun-18	145 late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as Aurora have sufficient reporting in place to identify this, but due to resource constraints and an increase in the number of contractors approved to work on the network, the volume of late updates has increased. 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.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue identified relates to the late notification of historic events, so no further action is required.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora Energy's Customer Initiated Works team will review the way it gathers information from contractors in the field to ensure accurate information is provided in a timely fashion.		31 Dec 2020	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 02-Jul-18</p> <p>To: 26-Feb-20</p>	<p>Updates to registry backdated greater than 3 business days.</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>The controls are rated as moderate. Aurora has robust reporting in place which identifies discrepancies which ensures that discrepancies are identified but some errors still occur.</p> <p>The Audit risk rating is low as the majority of the changes have no impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<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	Identified
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> <p>As noted in 3.5, above, Aurora Energy's Customer Initiated Works team will review the way it gathers information from contractors in the field to ensure accurate information is provided in a timely fashion.</p> <p>We will review the circumstances surrounding the NSP change. While this is a rare occurrence, we will consider the lessons learned from the recent change and establish a formal process to manage any future change</p>		31 Dec 2020	

NSP accuracy		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clause 7(1)(b) of Schedule 11.1</p> <p>From: 02-Jul-18</p> <p>To: 26-Feb-20</p>	<p>Four ICPs with incorrect NSPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low as the NSPs in question are in the same balancing area.</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> <p>NSP changes and DG updates have been completed.</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> <p>As noted in 3.5, above, Aurora Energy's Customer Initiated Works team will review the way it gathers information from contractors in the field to ensure accurate information is provided in a timely fashion.</p> <p>We will review the circumstances surrounding the NSP change. While this is a rare occurrence, we will consider the lessons learned from the recent change and establish a formal process to manage any future change</p>		31 Dec 2020
Identified		

ICP location address			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 2 of Schedule 11.1</p> <p>From: 02-Jul-18</p> <p>To: 26-Feb-20</p>	<p>Eight ICPs with duplicate addresses and some addresses no longer readily locatable due to addressing update in GTV.</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>Controls are rated as robust as they will mitigate risk most of the time. A one-off event has inadvertently affected the addressing information.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation but could affect meter readers ability to get manual reads.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The eight ICPs with duplicate addresses have been corrected.		Completed	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Aurora Energy perform a monthly check for duplicate addresses. A large update was made to the freeform fields in the registry in mid-April, prior to this audit being performed between April 22 – 24. The duplicate addresses would have been identified as part of Aurora Energy’s routine check at the end of April.</p> <p>We will review whether a change to our process would better manage instances where a customer wishes to connect, but address information has not been issued by Council. An obvious solution would be not to connect any ICP until address information is available; however, this would likely result in poor customer service.</p>		31 Dec 2020	

Registry accuracy			
Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(k)&(p) of Schedule 11.1</p> <p>From: 02-Jul-18</p> <p>To: 26-Feb-20</p>	<p>1 ICP with incorrect IECD.</p> <p>Known unmetered load not recorded.</p> <p>NSP dedication flag incorrect for 2 LE ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate. There is reporting in place to identify discrepancies but there is room for improvement.</p> <p>The audit risk rating is low as the errors found have a minor effect on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP with incorrect IECD was identified during the audit and has been corrected, as has the known UML not recorded and NSP incorrect dedication flag for the two LE ICPs.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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.		31 Dec 2020	

Provision of price category codes			
Non-compliance	Description		
<p>Audit Ref: 4.7</p> <p>With: Clause 7(3) of Schedule 11.1</p> <p>From: 01-Jul-18</p> <p>To: 31-Mar-20</p>	<p>22 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: Twice</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 as Aurora have sufficient reporting in place to identify this but due to resource constraints and an increase in the number of contractors approved to work on the network, the volume of late updates has increased.</p> <p>The audit risk rating is low as the number of late pricing updates is small compared to the overall number of new connections.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue identified relates to the late notification of historic events, so no further action is required.		N/A	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
This finding is a flow-on effect of the issues highlighted in section 3.4. As stated in our response to section 3.4. Aurora Energy will investigate a change in the New Connection process to streamline ICP creation, where practicable. this may involve creating new ICPs in 'Ready' status when it is evident that no construction work is required, removing the need for contractors to notify when the network is ready to connect to.		31 Dec 2020	

Decommissioned status		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 20 of Schedule 11.1 From: 28-May-19 To: 26-Feb-20	One ICP 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 rated as strong. Aurora have robust reporting in place to ensure risk are mitigated. The audit risk is rated as low as this has no impact on settlement	
Actions taken to resolve the issue		Completion date
The one incorrect ICP was corrected following this audit.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
As stated in the audit report " <i>Controls are rated as strong. Aurora have robust reporting in place to ensure risk are mitigated</i> "; however we will review our processes to determine whether additional detective controls can be implemented		31 Dec 2020
		Investigating