

Compliance plan for Orion Distributor –2020

Complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Jan-19 To: 31-May-20	Incorrect event date applied to registry for the initial electrical connection date update. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. There is no impact to the market therefore I have rated the audit risk rating as low.	
Actions taken to resolve the issue		Completion date
Orion accepts this finding and will review the relevant automated registry update process to prevent the issue in future.		31/3/21
Preventative actions taken to ensure no further issues will occur		Completion date
As above		31/3/21
		Investigating

Ready updates		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 23-Nov-18 To: 04-Apr-20	9 ICPs changed to “ready” after electrical connection. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Orion has a strong process in place with immaterial errors often as a result of human error that is quickly corrected once identified.		19/8/20
Preventative actions taken to ensure no further issues will occur		Completion date
No further preventative actions intended		19/8/20
		Identified

Provision of the initial electrical connection date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Jan-19 To: 29-May-20	144 late updates of the initial electrical connection date. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Orion accepts this finding and will review the relevant automated registry update process to prevent the issue in future.		31/3/21
Preventative actions taken to ensure no further issues will occur		Completion date
As above		31/3/21
		Investigating

Connection of an ICP that not an NSP		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 11.17 From: 01-Jan-19 To: 29-May-20	9 ICPs electrically connected prior to a trader being recorded as having accepted responsibility. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The audit risk rating is assessed to be low as this affected only nine ICPs.	
Actions taken to resolve the issue		Completion date
Orion has a strong process in place with immaterial errors often as a result of human error that is quickly corrected once identified.		19/8/20
Preventative actions taken to ensure no further issues will occur		Completion date
No further preventative actions intended		19/8/20
		Identified

Registry updates		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Jan-19</p> <p>To: 31-May-20</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: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong. Orion has robust checks and processes in place to ensure wherever possible events are updated to the registry as soon as possible.</p> <p>The audit risk rating is low as the volume of backdated events is small and those backdated have little to no impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Orion has strong controls in place however some activities rely on timeliness by third parties that can decrease compliance by us. Our NSP update process is automatic so this means where backdating occurs a manual process to address NSP changes in the timeline needs to occur.		19/8/20
Preventative actions taken to ensure no further issues will occur		Completion date
We do not intend taking any further preventative actions		19/8/20
		Identified

Notice of NSP for each ICP		
Non-compliance	Description	
Audit Ref: 4.2 With: Clause 7 (1)(b) Schedule 11.1 From: 30-Sep-19 To: 31-May-20	One ICP assigned to the incorrect NSP. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong. Orion has robust checks and processes in place to ensure ICPs are mapped correctly. The audit risk rating is low to none as the NSPs are in the same balancing area for the one ICP that was found to be incorrectly mapped.	
Actions taken to resolve the issue		Completion date
The NSP has been correctly linked to ISL0661 for ICP 0007189815RN9DB and backdated on the registry to the date of livening		19/8/20
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Explanation for ICP 0007189815RN9DB – When the new transformer at the site was introduced to the network, the HV circuit breakers of the transformer were open. Therefore the GIS would have been updated to include the new transformer, but with those CBs in the open state. When tracing runs in the GIS to update PowerOn, it stops at open points, in this case the transformer CBs. Therefore, although the ICP was correctly linked in the GIS, this information wasn't passed to PowerOn. The ICP for the transformer in question didn't seem to be in PowerOn at all, not even as an unlinked ICP.</p> <p>The CBs were closed some weeks after becoming part of the network, but there was nothing to flag to Mapping that this had happened. Therefore, the GIS wasn't updated to match.</p> <p>That meant that the trace that runs nightly in PowerOn to update the GXP information for the ICP in Connections couldn't correct the data. It would also have meant that the ICP wouldn't have been included in any outage statistics that affected it.</p> <p>Course of action: investigate this type of situation to see if it could be captured by a report. The situation is reasonably complex and we will need to identify the best way of highlighting such errors.</p>		31/3/21
		Investigating

Registry accuracy		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 06-Dec-19</p> <p>To: 31-May-20</p>	<p>Three incorrect initial electrical connection dates.</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>The controls are rated as strong as Orion have robust reporting and processes in place to identify potential discrepancies and any found are corrected.</p> <p>There is no impact on settlement in relation to incorrect initial electrical connection dates therefore I have recorded the audit risk rating as low.</p>	
Actions taken to resolve the issue		Completion date
Orion will correct our registry data as information comes to hand		19/8/20
Preventative actions taken to ensure no further issues will occur		Completion date
Orion contacts and discusses these matters with third parties in an attempt to align registry data. This is an ongoing activity. We may consider whether unmetered BTS should continue.		19/8/20
		Identified

Shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 11.14(2) and (4)</p> <p>From: 14-Oct-14</p> <p>To: 31-May-20</p>	<p>Unmetered load recorded as shared unmetered load when it should be recorded as standard unmetered load and the SI ICPs be decommissioned.</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>The controls are recorded as strong as Orion has robust checks in place. Both of these instances are exceptions.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Orion will make corrections/updates as identified following liaison with relevant traders and customers		19/10/20
Preventative actions taken to ensure no further issues will occur		Completion date
No additional preventative actions are planned. We no longer allow new installations of shared unmetered load.		19/8/20
		Identified