

Compliance plan for Aurora, Distributor 2024

Requirement to provide complete and accurate information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2(1)</p> <p>From: 01-Feb-23</p> <p>To: 31-Jan-24</p>	<p>Eight decommissioned ICPs at the incorrect status in the registry.</p> <p>24 unmetered ICPs with no unmetered load details recorded.</p> <p>Seven of the sample of ten ICPs with no initial electrical connection date recorded.</p> <p>NSP dedication flag incorrect for two LE ICPs.</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	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit impact is assessed to be low as the volume of incorrect or missing data was small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> - Identified issues will be corrected in the registry with the exception of unmetered ICPs that relate to temporary builders' supplies. 		31 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> - New ICP requests for unmetered load will not be set to 'ready' status until load details are supplied by the customer. - Monthly internal audit checks identify incorrect ICP details which are then corrected immediately. 		31 May 2024	
		Ongoing	

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11.2 (2) From: 01-Feb-23 To: 31-Jan-24	NSP dedication flag incorrect for two LE ICPs. 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 rated as moderate as they will mitigate risk most of the time but there is room for improvement. The audit impact is assessed to be low as the non-compliance relates to two LE ICPs only.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP details have been corrected in the registry.	10 May 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly internal audit checks identify incorrect ICP details which are then corrected immediately.	Ongoing	

Provision of ICP Information to the registry			
Non-compliance	Description		
<p>Audit Ref: 3.3 With: Clause 11.7</p> <p>From: 01-Feb-23 To: 31-Jan-24</p>	<p>Seven of the sample of ten ICPs with no initial electrical connection date recorded.</p> <p>23 unmetered ICPs electrically connected during the audit period with no unmetered load recorded.</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Twice previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit impact is assessed to be low as this is a small number of the overall number of ICPs electrically connected during the audit period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> - Identified issues will be corrected in the registry with the exception of unmetered ICPs that relate to temporary builders' supplies. 		31 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> - Monthly internal audit checks identify incorrect ICP details which are then corrected immediately. 		Ongoing	

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Feb-23 To: 31-Jan-24	One ICP not made "ready" on the registry prior to the it being electrically connected. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as the processes in place have sufficient checks to mitigate the risk to an acceptable level. The audit impact is assessed to be low as the one ICP affected was updated one day late.	
Actions taken to resolve the issue	Completion date	Remedial action status
Issued has been corrected.	31 January 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly internal audit checks identify incorrect ICP details which are then corrected immediately.	Ongoing	

Timeliness of Provision of Initial electrical connection Date to the registry		
Non-compliance	Description	
<p>Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1</p> <p>From: 01-Feb-23 To: 31-Jan-24</p>	<p>Some late initial electrical connection date updates (unable to determine the actual number due to incorrect reporting).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</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 Aurora have sufficient reporting in place to identify this and they are working with the contractors to ensure paperwork is returned promptly.</p> <p>The audit risk rating is assessed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Aurora Energy has corrected the ICPs with no IECD.	10 May 2024.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly internal audit checks identify incorrect ICP details which are then corrected immediately.	Ongoing	

Changes to Registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Feb-23</p> <p>To: 31-Jan-24</p>	<p>1,107 late address updates.</p> <p>Some late pricing updates.</p> <p>36 late status updates.</p> <p>Two late network updates.</p> <p>Some late initial electrical connection date updates (unable to determine the actual number due to incorrect reporting).</p> <p>One late NSP change.</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 and will mitigate risk most of the time but there is room for improvement.</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
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.	No Change	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Aurora has implemented an internal compliance report that is monitored monthly. Any issues of non-compliance will be corrected immediately	Ongoing	

ICP location address			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 2 of Schedule 11.1</p> <p>From: 01-Feb-23</p> <p>To: 31-Jan-24</p>	<p>Eight ICPs with duplicate addresses.</p> <p>662 "active" ICPs with insufficient address details to make these readily locatable.</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 rated as moderate as they will mitigate risk most of the time but there is an opportunity for improvement.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation but could affect meter readers or fault staff ability to find properties.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Non-compliant ICPs have been corrected		10 May 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora maintains an internal compliance report which identifies most issues of non-compliance which are corrected immediately.		Ongoing	

Non-compliance	Description	
<p>Audit Ref: 4.6 With: Clause 7(1)(l), (m)&(p) of Schedule 11.1</p> <p>From: 01-Feb-23 To: 31-Jan-24</p>	<p>Eight of a sample of 16 ICPs with the incorrect initial electrical connection date recorded.</p> <p>Seven of the sample of ten ICPs of a possible 33 ICPs with no initial electrical connection date recorded.</p> <p>24 unmetered ICPs with no unmetered load details recorded.</p> <p>NSP dedication flag incorrect for two LE ICPs.</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	
<p>Low</p>	<p>Controls are rated as moderate as they will mitigate risk most of the time 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
<p>Non-compliant ICPs have been corrected.</p>	<p>10 May 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Aurora has implemented an internal compliance report that is monitored monthly. Any issues of non-compliance will be corrected immediately</p>	<p>Ongoing</p>	

Management of “decommissioned” status		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 20 of Schedule 11.1</p> <p>From: 01-Feb-23</p> <p>To: 31-Jan-24</p>	<p>One decommissioned ICP at the incorrect status in the registry.</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	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit impact is assessed to be low as the number of incorrect statuses on the registry were small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Non-compliant ICPs have been corrected.	10 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Aurora has implemented an internal compliance report that is monitored monthly. Any issues of non-compliance will be corrected immediately	Ongoing	