

Electra

Compliance Plan 2024

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: <i>Clause 11.2(1) and 10.6(1)</i></p> <p>From: 16-Jan-23</p> <p>To: 30-Jun-24</p>	<p>Inaccurate or missing information related to distributed generation, IECD, addresses recorded in the registry</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 recorded as moderate. There is clear evidence of active monitoring of compliance and correcting historical discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Engaged in ongoing correspondence with approved livening agents to reinforce awareness of requirements and timeframes.</p> <p>The Network Information Team is actively addressing the list of non-compliant ICPs by collaborating with retailers and livening agents to accurately identify and record livening dates.</p> <p>Initiated a comprehensive review of current processes to identify areas for improvement.</p>		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Electra will introduce a new digital connection form to ensure the capture of all relevant information before a request is processed.</p> <p>The form will include the nomination of an approved living agent by the requester, allowing proactive follow-up on IECDs.</p> <p>This approach is effective if the nominated living agent is used but presents challenges if a different agent is involved. The primary indicator will then be the ICP's Active status update, which could limit the timeframe for verifying and recording the IECD.</p>	31/03/2025	
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Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: <i>Clause 11.2(2) and 10.6(2)</i></p> <p>From: 16-Jan-23</p> <p>To: 30-Jun-24</p>	<p>Inaccurate or missing information recorded in the registry.</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 recorded as moderate. There is clear evidence of active monitoring of compliance and correcting historical discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>Consistent with the response to 2.1, we have initiated a review of current processes and monitoring tools to enhance oversight.</p> <p>Distributed Generation remains a complex area; typically, DG connections do not require an Electra-approved contractor, making the registry Profile value the sole indicator of installation.</p> <p>Upon identifying an update to an ICP, efforts are made to locate the installer and obtain the necessary information for registry updates.</p> <p>Due to the involvement of multiple third parties, completing updates, apart from Installation Type, within the 3-day window poses a significant challenge.</p> <p>A completion date is difficult to set due to the ongoing nature of the issue and of factors outside our direct control.</p>	31/03/2025	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>We have commenced a review of current monitoring and processes with the objective of minimizing non-compliances.</p> <p>We will engage an industry expert to assist in the review of our monitoring and response processes.</p> <p>Due to our reliance on third parties for critical information, we recognize the challenges in meeting the 3-day compliance requirement</p>	31/03/2025	

Non-compliance	Description		
<p>Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1</p> <p>From: 16-Jan-23 To: 30-Jun-24</p>	<p>17% of IECDs during the audit period were populated in the registry more than 10 days after the event.</p> <p>59 ICPs connected prior to this audit period still did not have IECD populated in the Registry.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Choose an item.	<p>Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correcting historical discrepancies Registry in this area. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Aligned with the responses to Audit Ref: 2.1 and 2.2, we are conducting a thorough review of our monitoring processes to enhance our ability to identify and address non-compliances.</p> <p>Guidance has been sought from the EA on determining an IECD for historical ICPs where previous efforts to ascertain the date have been unsuccessful.</p>		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Preventative actions will be in alignment with those for Audit Ref: 2.1 and 2.2, focusing on improved monitoring and communication processes.		31/03/2025	

Non-compliance	Description		
<p>Audit Ref: 4.1 With: <i>Clause 8 Schedule 11.1</i></p> <p>From: 16-Jan-23 To: 30-Jun-24</p>	<p>A number of registry information updates(Address, Distributed Generation, Decommissioning) were greater than 3 business days from the event date.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Choose an item.	<p>Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correction of historical Registry discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Aligned with the responses to Audit Ref: 2.1 and 2.2, we are conducting a thorough review of our monitoring processes to enhance our ability to identify and address non-compliances.</p>		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Aligned with the responses to Audit Ref: 2.1 and 2.2, we are conducting a thorough review of our monitoring processes to enhance our ability to identify and address non-compliances.</p> <p>We will engage an industry expert to assist in the review of our monitoring and response processes.</p>		31/03/2025	

Non-compliance	Description		
Audit Ref: 4.4 With: <i>Clause 2</i> <i>Schedule 11.1</i> From: 16-Jan-23 To: 30-Jun-24	For 22 ICPs the address descriptions do not allow ICPs to be readily located. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correction of historical Registry discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Electra's process requires compliant address descriptions at the point of ICP creation. A review of not readily locatable ICPs is underway.		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electra's process requires compliant address descriptions at the point of ICP creation.		31/03/2025	

Non-compliance	Description		
<p>Audit Ref: 4.6 With: <i>Clause 7(1)</i> <i>Schedule 11.1</i></p> <p>From: 16-Jan-23 To: 30-Jun-24</p>	<p>Incorrect or missing information in the registry for distributed generation, Initial Electrical Connection Dates UML and NSP Status.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Choose an item.	<p>Controls recorded as moderate. There is clear evidence of active monitoring of compliance and correction of historical Registry discrepancies. Some enhancements can be made to improve compliance performance. The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A targeted data clean-up initiative is underway to correct historical inaccuracies in the registry, focusing on distributed generation and related fields.</p> <p>Strengthened collaboration with retailers and contractors to ensure timely and accurate submission of required information for distributed generation and IECDs.</p>		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Automated data entry and validation tools are being developed to minimize errors and ensure all required fields are completed accurately before registry submission.</p> <p>Periodic internal audits have been scheduled to review registry data for compliance and identify areas for improvement.</p> <p>Feedback loops with stakeholders have been established to address challenges and ensure ongoing accuracy in registry submissions.</p> <p>We will engage an industry expert to assist in the review of our monitoring and response processes.</p>	31/03/2025	
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