Annual Ring–fencing Compliance Report

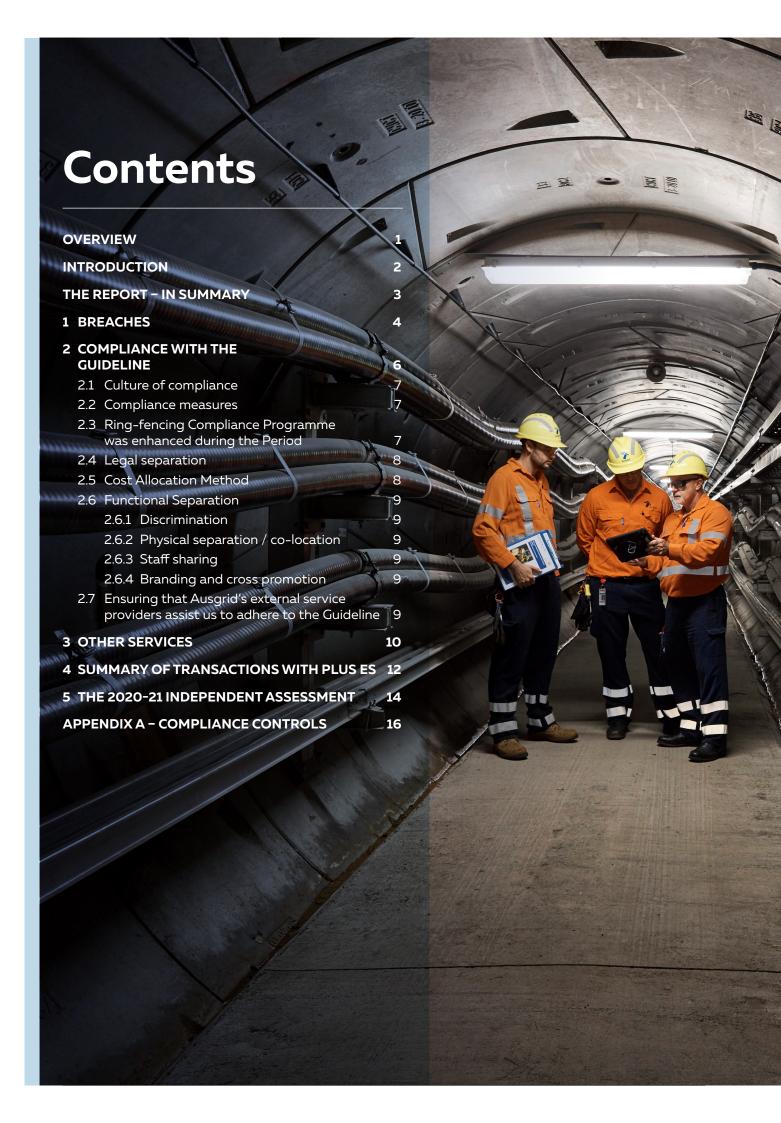## 2022

1 JANUARY 2022 TO 31 DEC 2022

Contents

Overview

The Ring-fencing Guideline – Electricity Distribution Version 3 (the Guideline) requires each Distribution Network Service Provider (DNSP) to prepare an annual Ring-fencing compliance report each regulatory year. Ausgrid Operator Partnership (ABN 78 508 211 731) (Ausgrid) is a DNSP, and this document (Report) has been prepared in compliance with clause 6.2 of the Guideline and other applicable provisions.

The reference period for this Report is 1 January 2022 to 31 December 2022 (the **Period**). The Report addresses Ausgrid's adherence to Version 3 of the Guideline, as in force for the entirety of the Period.

Clause 3.3 of the AER Electricity Distribution Ring-fencing Guideline – Compliance Reporting Best Practice Manual Version 3 dated March 2022 requires meaningful compliance reporting. In particular, the AER *"encourage[s] DNSPs to adhere to the following principles when writing their annual compliance reports:*

- *Report on specific measures, areas of the business, or challenges, rather than describing compliance measures in general, vague, or abstracted terms;*

- *Targeted reporting on areas of the business that carry greater risk of breaches of the Guideline or which have experienced breaches over the course of the regulatory year;*

- *Avoid jargon and technical language where possible and keep compliance reporting clear and as 'plain English' as possible; and*

- *Keep the report as succinct as possible and refer to previous reports if relevant.*

This Report has been prepared having regard to these principles.

Capitalised terms used in this Report, which are not otherwise defined in this Report, have the meaning given to them in the Guideline or the National Electricity Rules.

Introduction

This Report identifies and describes, in respect of the **Period**:

i.   The measures Ausgrid has taken to ensure compliance with the provisions of the Guideline;

ii. Any breaches of the Guideline by Ausgrid (or which otherwise relate to Ausgrid);

iii. All 'other services' provided by Ausgrid, in accordance with clause 3.1; and

iv. The purpose of all transactions between Ausgrid and its affiliated entity, PLUS ES Partnership (ABN 30 179 420 673) (**PLUS ES**).

In addition to the mandatory inclusions listed above the Report also considers:

v.   The exceptions and recommendations set out within the ' Ausgrid – Annual Ring-fencing Compliance Independent Assessment 2020–2021' as compiled by our auditor PwC (**the 2020–21 Independent Assessment**).

The selection of the above key focus areas was based upon:

·   Ausgrid's core values;

·   The mandatory inclusions required by the Guideline;

·   Guidance provided to the industry by the AER in February 2023; and

·   Comments provided in the Ring-fencing section of the *AER 2021-2022 Annual compliance and enforcement report* (**AER Report**) dated July 2022.

AUSGRID'S CORE VALUES

Work safe, live safe	**Customer focused**
Commercially minded	**Collaborative**
Honest and accountable	**Respect**

The report – in summary

TOPIC	SUMMARY OF SECTION	WHERE TO FIND
Breaches	Ausgrid had NIL breaches of the Guideline during the Period.	**Section 1**
Compliance measures	During the Period, Ausgrid continued to maintain appropriate internal procedures to ensure it complied with its obligations under the Guideline. During the Period additional controls were introduced to further strengthen Ring-fencing compliance.	**Section 2**
Provision of 'Other Services'	Ausgrid provides 'other services' in accordance with clause 3.1 of the Guideline.	**Section 3**
Purpose of transactions with PLUS ES	Ausgrid's transactions with PLUS ES fall within the following four service categories: 1. Metering related (Alternate Control Services) 2. Metering related (Standard Control Services) 3. Electrical and Fibre Services 4. Testing services.	**Section 4**
Outcomes of the 2020-21 Independent assessment	The Report addresses Ausgrid's response to the outcomes of the 2020-21 Independent Assessment.	**Section 5**

SECTION 1

Breaches

1   Breaches

In line with Ausgrid's values, Ausgrid utilises its Compliance Management Framework (the **Framework**) to establish a mechanism that allows it to identify and escalate Ring-fencing (**RF**) related issues.

There are various ways in which potential breaches are identified, including but not limited to:

· Internal compliance reviews that are undertaken in respect of Ausgrid's obligations under the Guideline;

· Annual attestation of controls and their effectiveness;

· Employees being able to notify Audit , Risk and Compliance (**ARC**) team of any potential compliance breaches, via email, phone or internal instant messaging. Employees are also encouraged to upload information directly to our compliance management solution, or emailing a dedicated Ring-fencing inbox (Ausgrid has trained and encouraged staff to report breaches of the Guideline or raise compliance concerns, for example, through Ausgrid's Encouraging Competition Through Ring-fencing Policy, regular internal communications and training programs);

· Complaints or other feedback from customers, contractors, suppliers and the general public;

· The 'whistleblower process'; and,

· Ausgrid's Information Communication Technology (**ICT**) data loss identification and escalation process.

Once a potential non-compliance is reported to ARC, the incident is reviewed to:

· Determine whether further information is required to support ARC's analysis;

· Assess whether any of the requirements of the Guideline have been breached;

· Assess whether there has been a failure in any of the established control(s);

· If a breach has occurred:

   – In conjunction with senior management and staff in other groups, investigate why or how the breach occurred; and the opportunities to remediate the breach and prevent reoccurrence; and

   – Prepare a breach report for submission to the AER within the specified timeframe.

During the Period, there were no breaches of the Guideline.

The Table below shows Ausgrid's breach history since 2017 to date.

FIGURE 1: BREACH HISTORY

PERIOD	INTENTIONAL BREACHES TO SUPPORT VULNERABLE CUSTOMERS*	UNINTENTIONAL BREACHES	TOTAL FOR REPORT PERIOD
1 July 2018 – 30 June 2019	35	4	39
1 July 2019 – 30 June 2020	6[1]	0	6
1 July 2020 – 31 December 2021	0	0	0
1 January 2022 – 31 December 2022	0	0	0

*The absence of Intentional breaches in recent years mostly due to the impact of the '30 minute rule' per 5.1.1. of the AER 2019-24 Determination (the **Determination**). During the Period all of the contestable work performed by Ausgrid under its Vulnerable Customer Protocol fell within the terms of the '30 minute rule' and therefore did not constitute breaches of the Guideline.

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1   All related to a severe storm response including customers that were without supply for over 7 days and there was difficulty finding an ASP/2 to perform the work.

Compliance with the Guideline

2   Compliance with the Guideline

2.1   Culture of compliance

Since the establishment of the Guideline, Ausgrid's understanding of the Guideline's requirements and our Ring-fencing compliance culture has matured considerably. This has been assisted by ongoing communication and guidance from the AER on an on-going basis as well as through its annual compliance reports.

In particular, during the Period, Ausgrid has observed:

- A strong top-down approach of compliance and governance specific to Ring-fencing obligations;
- The heightened employee awareness of our Ring-fencing obligations across all relevant groups in the organisation, for example via training and open communication systems;
- Ring-fencing compliance being given due consideration when each new initiative or changes to existing practices and systems are being considered;
- Increased staff engagement with the Legal and ARC teams to ensure compliance with the Guideline; and
- Overall increased compliance maturity as part of our culture and the Framework.

2.2   Compliance measures

Ausgrid's compliance program aims to ensure all regulatory and legislative requirements are met, including:

- Identification of compliance and risk activities that are, for example, associated with legislative and/or regulatory obligations (**Compliance Activity**);
- Allocation of individual responsibility for each Compliance Activity to an individual at management level;
- Mapping the Compliance Activity to specific regulatory provisions (**citations**) with each citation being allocated a Subject Matter Expert (**SME**);
- Identification of a control/s in respect of each citation with which the relevant SME must comply; and
- Annual attestation of the efficacy of controls.

Appendix A to this Report lists the controls that Ausgrid has in place to promote compliance with the Guideline.

2.3   Ring-fencing Programme Enhancements

Ausgrid has always strived to enhance its Framework over time. This reporting period enhancements include[2] (but are not limited to):

- Implementing new controls to address the outcomes of the 2020-21 Independent Assessment (see section 5 of this Report);
- Staff common information portals are triaged prior to the release of any information to PLUS ES; and
- New innovations such as Standalone Power Systems (**SAPS**) Resource Provider and community batteries are subject to an independent review to confirm whether ring fencing waivers are required.

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2   Some of the items listed may be 'Work in Progress': This Report does not represent that all of the initiatives were completed during the Period.

2.4   Legal Separation

Clause 3.1 of the Guideline permits Ausgrid to provide distribution services and transmission services but prohibits it from providing 'other services'. Accordingly, legal separation is achieved through the existence of Ausgrid's affiliated entity, PLUS ES, which is Ausgrid's 'Related Electricity Service Provider' (**RESP**). With the exception of clause 3.1(d) of the Guideline (as outlined in section 4 of this Report), PLUS ES provides all 'other services'. This demarcation is illustrated in Figure 2.

However, there is an exception to the regime illustrated in Figure 2. Pursuant to the AER's 2019 –24 Regulatory Determination, Ausgrid can perform minor repair works under 30 minutes and may elect to provide services of longer duration to vulnerable customers[3]. There are established protocols embedded within the organisation to ensure due process is followed and appropriate record keeping occurs when undertaking such 'other services'.

2.5   Cost Allocation Method

Ausgrid maintains a cost allocation methodology (**CAM**) which attributes and allocates costs to individual lines of business. This includes attributing and allocating certain direct and shared costs to PLUS ES. The CAM is AER-approved and is reviewed annually to ensure it remains compliant with the Guideline.

Ausgrid has controls in place to ensure the appropriate application of the CAM, including:

· Undertaking an annual review of cost allocators and allocation methodology, including the businesses shared costs and corporate overheads. The allocation of costs in accordance with the CAM is subject to an annual audit in connection with the submission of Regulatory Information Notices (**RINs**);

· Using Ausgrid's accounting system, SAP, which identifies separate legal entities for the purposes of recording transactions between Ausgrid and PLUS ES;

· Maintaining monthly journal transfer and reconciliation processes between Ausgrid and PLUS ES; and

· Utilising dedicated Ausgrid accounting and finance personnel who ensure that the CAM meets the AER Cost Allocation Guideline, is pragmatically applied, and that the clear separation of accounts between Ausgrid and PLUS ES is maintained.

FIGURE 2: LEGAL SEPARATION AT AUSGRID

Illustrative example of services Ausgrid can and cannot provide from 1 January 2018.
1 Ausgrid will continue to make the network safe. A decision to restore or repair a service wire will be made following an on-site inspection.
2 Ausgrid may be able to bypass a faulty meter to restore supply.

3   i.e. Intentional Breach

2.6 Functional Separation

2.6.1 Discrimination

Ausgrid avoids discriminating in favour of PLUS ES by implementing robust compliance controls and measures as an integral part of its processes and business culture. Ausgrid's ARC performs the second line of defence in respect of compliance controls and risk management.

2.6.2 Physical separation / co-location

Ausgrid continues to apply the key controls and measures i.e., *Ausgrid's Procedure – PLUS ES Accommodation and Security* (the **Separation Procedure**) and its accommodation analysis heatmap (**Heatmap**).

The Separation Procedure applies to all Ausgrid and PLUS ES staff, is mainly administered by Ausgrid's Strategic Property Business Unit, and forms the basis for the management and allocation of office space to PLUS ES staff, and also for the way that Ausgrid manages the risks associated with facilities shared between the two organisations, such as commonly available meeting rooms (**shared amenities**)[4].

In addition to the Separation Procedure and Heatmap, ARC conducts monitoring and testing of physical segregation arrangements. Any adverse findings arising from these reviews are further investigated and where required, actions implemented including, for example, rectifying the issue, discussions with relevant staff and/or implementing system/process corrections.

2.6.3 Staff sharing

Compliance with staff sharing obligations is one of Ausgrid's highest Ring-fencing compliance priorities and is managed utilising robust systems and processes. Ausgrid staff are loaned to PLUS ES in accordance with the Guideline and supported by *Ausgrid Procedure - Temporary supply of Ausgrid staff to PLUS ES* (**Staff Sharing Procedure**). This includes controls which mandate the changeover of Ausgrid and PLUS ES uniforms, badges, ID cards etc at the beginning and cessation of each loan period.

Ausgrid also has compliance controls in respect of staff sharing by implementing innovative solutions such as:

·   Smart tools with inbuilt scripts in our HR systems, which identify staff movements and automatically set up system access rights in accordance with pre-determined rules established by Ausgrid, for the duration of each staff sharing arrangement;

·   The Data Leakage Prevention (DLP) is a detective control that alerts the Cyber Security Operations Centre that data matching specified rules have been shared inappropriately internally between Ausgrid and PLUS ES as well as external entities; and

·   Heightened cyber protection software and controls to ensure the protection of confidential information.

2.6.4 Branding and cross promotion

Ausgrid has continued to maintain separation of branding for Ausgrid and PLUS ES, with each business having its own branding guidelines and marketing campaigns. The following are some examples where the separation of branding is in place:

·   External websites;

·   Internal intranet site;

·   User desktops, including those of Ausgrid staff temporarily loaned to PLUS ES;

·   ID cards;

·   All letterheads and templates - external and internal, including the *External Partner Code of Conduct*;

·   Uniforms (where applicable) and related materials; and

·   Field vehicles and related equipment.

Ausgrid's Ring-fencing compliance program aims to prevent cross promotion of PLUS ES, particularly in the contestable electricity services market. Communications with staff, as well as training modules, emphasise the obligation not to promote or refer work to PLUS ES. In addition:
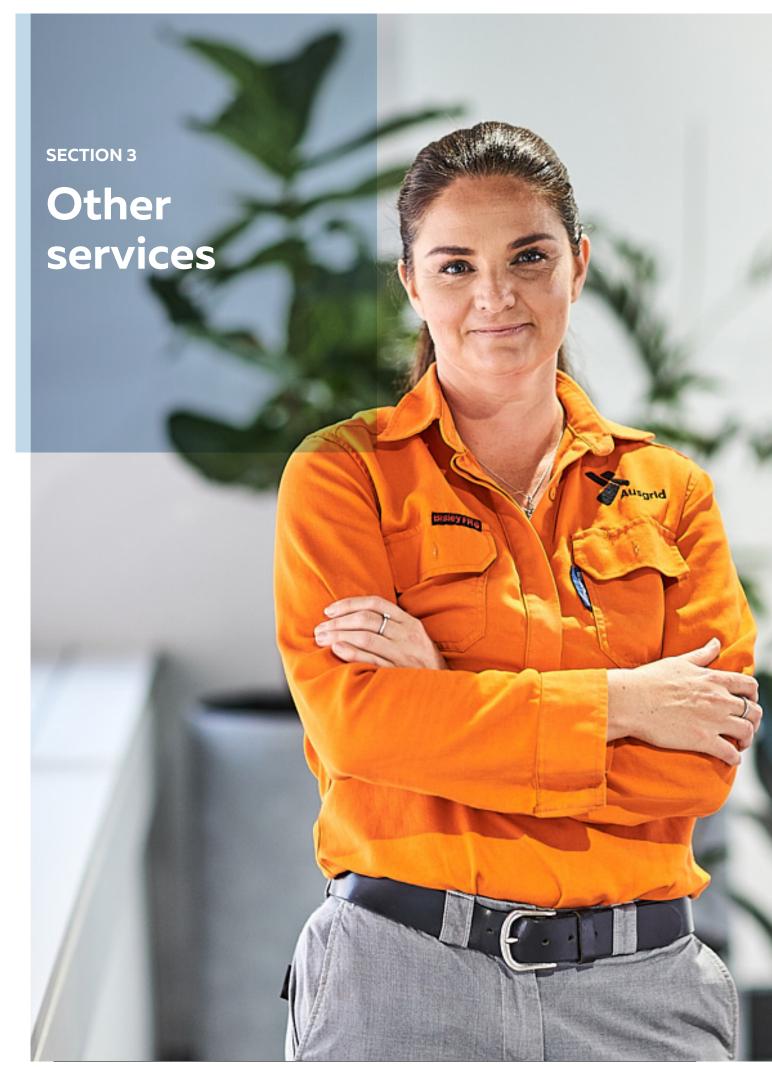
·   Contact Centre leaders and staff, are provided with scripts which clearly advise staff not to mention or refer work to PLUS ES;

·   Ausgrid Field staff are trained to provide scripted refusals to customers who ask them to perform contestable work; and

·   Managers remind their teams of their obligations and to encourage staff to voice their opinions/concerns regarding any actual or perceived non-compliance via the various internal escalation processes available to them.

2.7 Ensuring that Ausgrid's external service providers assist us to adhere to the Guideline

Ausgrid's standard contractual templates include a clause requiring the counterparty to do all that is necessary to ensure Ausgrid complies with the Guideline.

Where necessary or appropriate Ring-fencing related training and reminders are provided to Ausgrid staff are also provided to other entities who perform services on behalf of Ausgrid.

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4   Ausgrid notes that in previous correspondence the AER has articulated specific concerns in relation to the risks associated with shared amenities.

Other services

3 Other services

The below table sets out the instances where Ausgrid has provided other services in the Period in accordance with clause 3.1 (d)

FIGURE 3: AUSGRID PROVISION OF OTHER SERVICES IN ACCORDANCE WITH GUIDELINE 3.1 (d)

APPLICABLE SUB-CLAUSE OF 3.1(D)	SERVICE(S) PROVIDED	DETAILS
i	We provide services to other legal entities such as Telecommunication providers and EV charging network providers, the rights to use our assets such as: · Poles · Dark fibre · Duct · Data backhaul service · Other structural network assets	The services are provided under licence arrangements and agreements.
ii	The following corporate services were provided to PLUS ES: · General Administration · General Corporate · Accounting/Finance · Treasury · Human Resources/Payroll · ICT · Legal/Regulatory · Procurement · Fleet · Health, Safety and Environment · Company Secretary and Office of CEO · Audit · Corporate Affairs · Property & Facilities	In accordance with exception provided in clause 3.1(d)ii as well as the Services Agreements with PLUS ES established at an arm's length basis, Ausgrid has provided these services to PLUS ES while adhering to its obligations in clause 3.2 for these arrangements.
iii	The relevant office and staff provided to PLUS ES are noted in: · Office register · Staff sharing register	In accordance with exception provided in clause 3.1(d)iii as well as the exceptions provided in clauses 4.2.1(b) and 4.2.2(b), Ausgrid has allowed for such services and co-location arrangements in limited and highly controlled circumstances.
iv	Electricity information was provided to PLUS ES as our contracted service provider for the following services: · Ausgrid's Metering Services; and · Ausgrid's Electrical and Fibre Services Electricity information is also provided to other service providers such as our vegetation management contractors.	As permitted under clause 3.1(d)(iv) and while maintaining compliance with clause 4.3.

SECTION 4

Summary of transactions with PLUS ES

4 Summary of transactions with PLUS ES

PLUS ES provides a range of services to Ausgrid. They are provided under the terms of four service agreements.

FIGURE 4: PLUS ES PROVISION OF SERVICES TO AUSGRID

TRANSACTIONS	PURPOSE
Electrical and Fibre Services: · Ausgrid Fibre Optic Network · External third-Party Fibre Optic Duct Study Request – Facilities Access · Customer Works Associated with Substation Replacement/ Removal · Standby Services for Customers Accessing Substations · Undergrounding of Service Mains · Subs-Transmission Network Maintenance · Specialist Projects.	Ancillary to its own distribution and transmission services, Ausgrid contracts for certain services to specialised providers.
Testing Services: · Calibration Services · Electrical Testing Services · Conduct of Tests – Electrical Testing · Test Documentation – Electrical Testing · Record Retention and Ownership – Electrical Testing · Consulting Services – Electrical Testing.	Ancillary to its own distribution and transmission services, Ausgrid contracts for certain services to specialised providers.
Metering Related (Alternative Control Services)	Provide Metering Services to enable Ausgrid Network to provide Alternate Control Services and related Ancillary Network Services.
Metering Related (Standard Control Services)	Provide Metering and related Services for the Ausgrid Network to enable it to provide Standard Control Services with respect to the Metering Points.

The 2020–21 Independent Assessment

5 The 2020–21 Independent Assessment

PwC's 2020–21 Independent Assessment report made two recommendations for Ausgrid management to implement.

FIGURE 5: PWC RECOMMENDATIONS ISSUED 2020-21

GUIDELINE OBLIGATION	RESULTS OF TESTING	RECOMMENDATIONS	AUSGRID SUBSEQUENT ACTIONS
4.1 (c)(iv)	User access reviews are conducted on an ad hoc basis: there is no set schedule for review.	PwC recommends that Ausgrid perform user access reviews on a prescribed schedule at an appropriate frequency.	**Completed** Ausgrid implemented annual user access reviews within the Identity Access Management (**IAM**) application, commencing March 2022. On 1 June 2022, Ausgrid also implemented user access reviews when job roles and position IDs are changed in IAM. The new manager is then requested to approve or revoke access.
4.3.2	Periodic review of emails sent without classification (partial Ring-fencing control) During the period, Ausgrid introduced control checks under which the transmission of certain categories of document outside the organisation is subject to manager pre-approval.	Management has indicated that this control is primarily focused on the sharing of general information within emails sent outside Ausgrid. Ausgrid recognises that enhanced monitoring can potentially assist in Ring fencing compliance. PwC recommends that Ausgrid conduct a review of this control with the aim of assessing whether it could be further developed or adapted so as to more directly relate to Ring-fencing risks.	**Completed** Ausgrid implemented a tool which blocked emails containing potentially sensitive information from immediate distribution and routed them through a management approval process.

The following table sets out controls Ausgrid has in place mapped to the obligations within the Guideline

Appendix A
Compliance controls

GUIDELINE REQUIREMENTS	MAPPED TO AUSGRID'S CONTROLS	
GUIDELINE CLAUSE	CONTROL #	CONTROL NAME & TYPE | **(P)** PREVENTATIVE | **(D)** DETECTIVE | **(M)** MITIGATIVE
3.1 (a)	Ring-001	Maintain Australian Company status of the DNSP (P)
	Ring-015	Ensure Distributor's Licence remains valid and current (P)
3.1 (b)	Ring-010	Ausgrid's website assists customers to find an ASP to perform contestable services (P)
	Ring-012	Vulnerable customer protocol is applied by Field Operations unit (P)
	Ring-049	Services Agreement clearly defines the services the DNSP entity will provide, and what the affiliate will provide (P)
	Ring-073	Field Operations Staff advised and regularly reminded of AER 30 minute determination re contestable work (P)
	Ring-080	Annual Compliance Review of '30 Minute jobs' data in Computer Aided Services System (**CASS**) (D)
3.1 (d) (vii)	Ring-078	Quarterly Review of Scale of Ausgrid Business Activities as a supplier of other services as a SAPS Resource Provider (D)
3.2.1 (a)	Ring-003	AER approved Cost Allocation Methodology in place (P)
	Ring-017	Documented process in place for affiliate related financial journal transfers (P)
	Ring-048	Separate SAP accounting for affiliates (P)
	Ring-050	Corporate Services Agreement established between the parent and affiliate entities deals with apportionment of costs for shared services (P)
	Ring-069	Finance team regularly reviews the Labour Services Agreement and on-loan arrangement invoices (D)
	Ring-072	Annual review of the application of the CAM Cost Allocation Methodology is undertaken (D)
3.2.2 (a) & (b)	Ring-003	AER approved Cost Allocation Methodology in place (P)
	Ring-017	Documented process in place for affiliate related financial journal transfers (P)
	Ring-048	Separate SAP accounting for affiliates (P)
	Ring-050	Corporate Services Agreement established between the parent and affiliate entities deals with apportionment of costs for shared services (P)
	Ring-069	Finance team regularly reviews the Labour Services Agreement and on-loan arrangement invoices (D)
	Ring-072	Annual review of the application of the CAM Cost Allocation Methodology is undertaken (D)
3.2.2 (c)	Ring-018	Documented process in place for storage of affiliate related transactions/invoices (P)
4.1 (b)	Ring-010	Ausgrid's website assists customers to find an ASP to perform contestable services (P)
	Ring-011	Contact Centre scripts include generic references to contestable service providers (P)

GUIDELINE REQUIREMENTS	MAPPED TO AUSGRID'S CONTROLS	
GUIDELINE CLAUSE	CONTROL #	CONTROL NAME & TYPE | (P) PREVENTATIVE | (D) DETECTIVE | (M) MITIGATIVE
4.1 (c) (i)	Ring-010	Ausgrid's website assists customers to find an ASP to perform contestable services (P)
	Ring-023	Metering Services Agreements in place between Ausgrid and Plus ES (P)
	Ring-034	PLUS ES has its own policy on how it manages RF risk in its dealings with Ausgrid (P)
4.1 (c) (ii)	Ring-023	Metering Services Agreements in place between Ausgrid and Plus ES (P)
4.1 (c) (iii)	Ring-010	Ausgrid's website assists customers to find an ASP to perform contestable services (P)
	Ring-023	Metering Services Agreements in place between Ausgrid and PLUS ES (P)
	Ring-034	PLUS ES has its own policy on how it manages RF risk in its dealings with Ausgrid (P)
4.1 (c) (iv)	Ring-004	Affiliate staff do not have access to parent entity intranet site (P)
	Ring-005	Allowable uses of confidential information stored in ICT systems defined (P)
	Ring-020	ICT system access is permissioned based on Critical Operational Analysis (P)
	Ring-027	Processes to protect the privacy of confidential information are defined (P)
	Ring-044	Role based system access requirements defined for affiliate staff (P)
	Ring-051	User access control and review regularly undertaken by Cyber team following documented procedure (P)
	Ring-058	Identify Access Management (IAM) application automatically updates access based on role (P)
	Ring-063	Identity and access management system has specialised rules for secondary accounts associated with on-loan arrangements (P)
	Ring-064	The ICT team applies the documented information security incident management procedure for all information security incidents (P)
	Ring-075	LRC Privacy Playbook interrogates non-compliance with the Guideline re information sharing (D)
	Ring-077	Approval checks before some types of sensitive or classified information can be shared via email outside Ausgrid (P)
	Ring-082	Gatekeeper Controls for Big Ideas Portal (P)
4.1 (d)	Ring-079	Quarterly Review of NSW Battery Storage Markets: competitive dynamics and scale of Ausgrid's activities (D)
4.2.1 (a) & (b)	Ring-009	Shared amenities analysis undertaken (P)
	Ring-024	Physical access granted to sites/offices is based on role and entity (P)
	Ring-029	Workspaces physically separated including electronic access controls for all doors (P)
	Ring-033	Procedure in place to articulate office accommodation and security approach for staff working for PLUS ES (P)
	Ring-045	Separate key system for affiliate to access sub-stations and other sites where necessary (P)
	Ring-065	ARC Perform Reviews of Physical Access (D)

GUIDELINE REQUIREMENTS	MAPPED TO AUSGRID'S CONTROLS	
GUIDELINE CLAUSE	**CONTROL #**	**CONTROL NAME & TYPE** | **(P)** PREVENTATIVE | **(D)** DETECTIVE | **(M)** MITIGATIVE
4.2.2 (a), (b), and (d)	Ring-008	Formal process governs the secondment of Ausgrid staff to any affiliate (P)
	Ring-016	Formal process governs the short-term supply of Ausgrid staff to any affiliate (P)
	Ring-024	Physical access granted to sites/offices is based on role and entity (P)
	Ring-055	Staff sharing requests can be routed to ARC team for advice/analysis/approval (P)
	Ring-056	Staff profile changes readily identified via HR Essentials system (P)
	Ring-065	ARC Perform Reviews of Physical Access (D)
4.2.2 (c)	Ring-006	Performance Awards/incentives are not allowed where performance achieved by breaching regulatory requirements (P)
	Ring-022	Measures used to assess staff performance do not support cross-subsidisation (P)
4.2.3 (a) (i)	Ring-046	Separate branding guidelines established for affiliate (P)
	Ring-047	Separate ID Cards for PLUS ES staff (P)
4.2.3 (a) (ii)	Ring-011	Contact Centre scripts include generic references to contestable service providers (P)
	Ring-040	Ring-fencing issues highlighted in Contact Centre Management Reports (D)
4.2.3 (a) (iii)	Ring-011	Contact Centre scripts include generic references to contestable service providers (P)
	Ring-040	Ring-fencing issues highlighted in Contact Centre Management Reports (D)
4.2.4 (a) & (b)	Ring-028	Office and Staff Sharing registers are published on Ausgrid's external website and periodically reviewed for accuracy (D)
	Ring-065	ARC Perform Reviews of Physical Access (D)
	Ring-081	Quarterly Review of all RF Registers (D)
4.3.1	Ring-004	Affiliate staff do not have access to parent entity intranet site (P)
	Ring-005	Allowable uses of confidential information stored in ICT systems defined (P)
	Ring-020	ICT system access is permissioned based on Critical Operational Analysis (P)
	Ring-027	Processes to protect the privacy of confidential information are defined (P)
	Ring-044	Role based system access requirements defined for affiliate staff (P)
	Ring-051	User access control and review regularly undertaken by Cyber team following documented procedure (D)
	Ring-058	Identity Access Management (IAM) application automatically updates access based on role (P)
	Ring-063	Identity and access management system has specialised rules for secondary accounts associated with on-loan arrangements (P)
	Ring-064	The ICT team applies the documented information security incident management procedure for all information security incidents (P)
	Ring-075	LRC Privacy Playbook interrogates non-compliance with the Guideline re information sharing (D)
	Ring-077	Approval checks before some types of sensitive or classified information can be shared via email outside Ausgrid (P)
	Ring-082	Gatekeeper Controls for Big Ideas Portal (P)

GUIDELINE REQUIREMENTS	MAPPED TO AUSGRID'S CONTROLS	
GUIDELINE CLAUSE	CONTROL #	CONTROL NAME & TYPE	(P) PREVENTATIVE	(D) DETECTIVE	(M) MITIGATIVE
4.3.2	Ring-004	Affiliate staff do not have access to parent entity intranet site (P)
	Ring-005	Allowable uses of confidential information stored in ICT systems defined (P)
	Ring-020	ICT system access is permissioned based on Critical Operational Analysis (P)
	Ring-027	Processes to protect the privacy of confidential information are defined (P)
	Ring-044	Role based system access requirements defined for affiliate staff (P)
	Ring-051	User access control and review regularly undertaken by Cyber team following documented procedure (D)
	Ring-058	Identify Access Management (IAM) application automatically updates access based on role (P)
	Ring-063	Identity and access management system has specialised rules for secondary accounts associated with on-loan arrangements (P)
	Ring-064	The ICT team applies the documented information security incident management procedure for all information security incidents (P)
	Ring-075	LRC Privacy Playbook interrogates non-compliance with the Guideline re information sharing (D)
	Ring-077	Approval checks for need to confirm when some types of sensitive or classified information can be shared via email outside Ausgrid (P)
	Ring-082	Gatekeeper Controls for Big Ideas Portal (P)
4.3.3 (a), (b) and (c)	Ring-032	Information register is published on Ausgrid's external website and periodically reviewed for accuracy (D)
4.3.3 (d)	Ring-026	Process in place to allow confidential information shared with an affiliate to be equally available to other entities, including terms & conditions, is established and available on the website (P)
4.3.3 (e)	Ring-026	Process in place to allow confidential information shared with an affiliate to be equally available to other entities, including terms & conditions, is established and available on the website (P)
4.3.4 (a) & (b)	Ring-032	Information register is published on Ausgrid's external website and periodically reviewed for accuracy (D)
	Ring-065	ARC Perform Reviews of Physical Access (D)
	Ring-081	Quarterly Review of all RF Registers (D)
4.3.4 (c)	Ring-032	Information register is published on Ausgrid's external website and periodically reviewed for accuracy (D)
	Ring-081	Quarterly Review of all RF Registers (D)
4.4.1 (a) & (b)	Ring-041	Ring-fencing related clauses included in legally approved templates used for procurement (P)
	Ring-053	PLUS ES External partner code of conduct addresses RF matters (P)
	Ring-059	Ausgrid External partner code of conduct addresses RF matters (P)
5.2	Ring-042	Ring-fencing waiver templates based on guideline requirements (P)

GUIDELINE REQUIREMENTS	MAPPED TO AUSGRID'S CONTROLS	
GUIDELINE CLAUSE	CONTROL #	CONTROL NAME & TYPE | (P) PREVENTATIVE | (D) DETECTIVE | (M) MITIGATIVE
5.7	Ring-043	Ring-fencing waivers are published on Ausgrid's external website[5] and periodically reviewed for accuracy (D)
	Ring-065	ARC Perform Reviews of Physical Access (D)
	Ring-081	Quarterly Review of all RF Registers (D)
6.1	Ring-002	Ad-hoc Ring-fencing communications issued to staff (P)
	Ring-007	Code of Conduct addresses various matters related to the Guideline (P)
	Ring-013	Controls reviewed and updated by SME's following non-compliance incidents (M)
	Ring-014	Controls reviewed and updated by SME's following regulatory changes (P)
	Ring-019	ARC team monitors changes in affiliate arrangements and assess versus regulatory requirements (P)
	Ring-031	ARC and Management issue Ring-fencing compliance awareness materials (P)
	Ring-035	Responsibilities of DNSP entity staff to support Ring-fencing compliance documented in a policy (P)
	Ring-036	Ring-fencing training program developed and implemented (P)
	Ring-037	Ring-fencing communications Information Sheet made available (P)
	Ring-038	Ring-fencing email address maintained to deal with queries and escalations (P)
	Ring-039	Ring-fencing intranet site established (P)
	Ring-070	Training compliance report generated and reviewed weekly (D)
6.2.1 & 6.2.2	Ring-030	Regulatory Reporting calendar established and monitored (P)
6.2.3 (a) & (b)	Ring-076	Register of Ausgrid's regulated stand-alone power systems is displayed on website and periodically reviewed for accuracy (D)
	Ring-065	ARC Perform Reviews of Physical Access (D)
	Ring-078	Quarterly Review of Scale of Ausgrid Business Activities as a supplier of other services as a SAPS Resource Provider (D)
	Ring-081	Quarterly review of all RF Registers (D)
6.3	Ring-025	Process established for the reporting and analysis of incidents with possible relevance to Ring Fencing, and also for timely notification of any non-compliances to regulator (D)
	Ring-038	Ring-fencing email address maintained to deal with queries and escalations (D)
	Ring-040	Ring-fencing issues highlighted in Contact Centre Management Reports (D)
	Ring-061	The ARC team monitors and investigates all potential breaches (D)
	Ring-080	Annual Compliance Review of '30 Minute jobs' data in CASS (D)

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5   https://www.ausgrid.com.au/Industry/Regulation/Ring-Fencing

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