# **Internal Audit Update**

Finance & Audit Committee

December 19, 2018



### 2018 Audit Plan Status

| #  | Entity    | 2018 Audit Plan  | Proposed Timing | Status        |  |
|----|-----------|--|-----------------|---------------|--|
|    |           |  |                 |               |  |
| 1  | PSEG LI   | Procurement  | Q2              | Completed     |  |
| 2  | PSEG LI   | Customer Credit & Collections                                      | Q3              | Reporting     |  |
| 3  | PSEG LI   | Non- Product (Miscellaneous) Billing                               | Q3              | Completed     |  |
| 4  | PSEG LI   | A&R Operations Services Agreement (OSA) Performance Metrics – 2018 | Q4              | Reporting     |  |
| 5  | PSEG LI   | Storm Invoices - 2017  | Q4              | Completed     |  |
| 6  | PSEG LI   | A&R Operations Services Agreement (OSA) Metrics Benchmarking Q2    |                 |               |  |
| 7  | PSEG LI   | Capital Project Performance Q2 Defe                                |                 |               |  |
| 8  | NGG       | Power Supply Agreement (PSA)- Property Tax True-Up Q3 Cor          |                 |               |  |
| 9  | LIPA      | Cybersecurity and Data Back-up and Recovery Review                 | Q3              | In - Progress |  |
| 10 | LIPA      | LIPA Board Policy Governance Q1                                    |                 | Completed     |  |
| 11 | LIPA      | LIPA Enterprise Risk Management (ERM) Assessment                   | Q4              | Cancelled     |  |
| 12 | LIPA/UDSA |  |                 |               |  |



### Status of the Implementation of Management's Action Plans

|                         | 2016                    |   |  |
|-------------------------|-------------------------|---|--|
|                         | # of Audit Observations | # Management Action Plans in<br>Response to Audit Observations<br>Completed | # Management Action Plans in<br>Response to Audit Observations<br>Open |
| LIPA Audits of PSEG LI  | 51                      | 50  | 1  |
| IPA Internal Audits     | 2                       | 2   | 0  |
| PSEG LI Internal Audits | 25                      | 25  | 0  |
|                         | 2017                    |   |  |
|                         | # of Audit Observations | # Management Action Plans in<br>Response to Audit Observations<br>Completed | # Management Action Plans in<br>Response to Audit Observations<br>Open |
| LIPA Audits of PSEG LI  | 34                      | 30  | 4  |
| IPA Internal Audits     | 11                      | 7   | 4  |
| PSEG LI Internal Audits | 19                      | 17  | 2  |
|                         | 2018                    |   |  |
|                         | # of Audit Observations | # Management Action Plans in<br>Response to Audit Observations<br>Completed | # Management Action Plans in<br>Response to Audit Observations<br>Open |
| LIPA Audits of PSEG LI  | 5                       | 2   | 3  |
| IPA Internal Audits     | 2                       | 0   | 2  |
| PSEG LI Internal Audits | 17                      | 10  | 7  |



### FOR CONSIDERATION

December 19, 2018

**TO:** The Finance and Audit Committee of the Board of Trustees

**FROM**: Thomas Falcone

**REQUEST:** Approval of the 2019 LIPA Internal Audit Plan

### **Requested Action**

The Finance and Audit Committee is requested to approve the 2019 LIPA Internal Audit Plan (the "Plan"), as shown on **Exhibit "B**".

### **Background**

In accordance with the International Standards for the Professional Practice of Internal Auditing (the "Standards"), LIPA annually establishes an Internal Audit Plan. The Standards provide in relevant part that the chief audit executive (i.e. the Vice President - Audit) must establish a risk-based plan to determine the priorities of the internal audit activity, consistent with the organization's goals. Additionally, as set forth in the Standards, the chief audit executive must communicate the internal audit activity's plans and resource requirements, including significant interim changes, to senior management and the Board for review and approval.

### **Discussion**

The 2019 LIPA Internal Audit Plan includes internal audits selected and prioritized based on the results of a risk assessment performed by the LIPA Internal Audit Department, input from various stakeholders, and the PSEG Long Island Internal Audit Department.

The annual goal is to define a plan that reflects adequate coverage across LIPA and PSEG Long Island's business units and risk areas, to align LIPA's strategic initiatives and top enterprise risks, and to address the resources necessary to successfully complete the Plan with input from key stakeholders and LIPA senior management.

The Plan includes eleven (11) audits and reviews of PSEG Long Island, two (2) audits of LIPA and the Utility Debt Securitization Authority and audits of the completed 2018 Management & Operations Audit Implementation Plans.

Additionally, for informational purposes, attached as <u>**Exhibit**</u>"C", is the 2019 Proposed PSEG Long Island Internal Audit Plan.

### **Recommendation**

Based upon the foregoing, I recommend approval of the above-requested action by the adoption of the Resolution in the form attached.

AttachmentExhibit "A"ResolutionExhibit "B"2019 Proposed LIPA Internal Audit PlanExhibit "C"2019 Proposed PSEG Long Island Audit Plan

### **RESOLUTION APPROVING THE 2019 INTERNAL AUDIT PLAN**

**RESOLVED**, that consistent with the attached memorandum, the Finance and Audit Committee of the Board Trustees hereby approves the 2019 Internal Audit Plan.

# 2019 PROPOSED LIPA INTERNAL AUDIT PLAN

Finance & Audit Committee

December 19, 2018

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# 2019 Proposed LIPA Internal Audit Plan

|    |                |                          |              |   |   | Proposed  |
|----|----------------|--------------------------|--------------|---|---|-----------|
| #  | Entity         | Business Unit            | Audit/Review | 2019 Audit Plan                                       | Audit Objective   | Timing    |
|    |                |                          |              |   | Evaluate the adequacy and operating effectiveness of processes        |           |
|    |                |                          |              |   | and controls within the management and operations of PSEG Long        |           |
| 1  | PSEG LI        | <b>Business Services</b> | Audit        | Fleet Asset Management                                | Island Fleet.   | 2nd Qtr   |
|    |                |                          |              |   | Evaluate the accuracy of the authorization, initiation, recording and |           |
|    |                |                          |              |   | reporting of PSEG LI system-generated and manual check request        |           |
| 2  | PSEG LI        | <b>Customer Services</b> | Audit        | Customer Refunds                                      | customer refunds.   | 3rd Qtr   |
|    |                |                          |              |   | Evaluate the adequacy and operating effectiveness of processes        |           |
| 3  | PSEG LI        | <b>Customer Services</b> | Audit        | Customer Data Protection                              | and controls for Customer Data Protection.                            | 2nd Qtr   |
|    |                |                          |              |   | Evaluate the adequacy and effectiveness of internal controls for the  |           |
| 4  | PSEG LI        | <b>Customer Services</b> | Review       | Dynamic Load Management Program                       | Dynamic Load Management Program.                                      | 3rd Qtr   |
|    |                |                          |              |   | Evaluate the completeness and accuracy of the calculation of          |           |
|    |                |                          |              |   | selected Tier 1 Performance Metrics for compliance with the           |           |
| 5  | PSEG LI        | Entity-Wide              | Audit        | 2019 A&R Operations Services Agreement (OSA) Metrics  | Amended & Restated Operations Services (OSA) Agreement.               | 3rd Qtr   |
|    |                |                          |              |   |   | 1st - 4th |
| 6  | PSEG LI        | Entity-Wide              | Review       | Revenue Assurance (5-Pack Review)                     | Perform five revenue assurance reviews.                               | Qtrs      |
|    |                |                          |              |   | Evaluate the adequacy and effectiveness of internal controls to       |           |
| 7  | PSEG           | ER&T                     | Review       | Power Supply Natural Gas Invoices                     | ensure the completeness and accuracy of Natural Gas Invoicing.        | 1st Qtr   |
|    |                |                          |              |   | Evaluate the adequacy and effectiveness of internal controls over     |           |
| 8  | PSEG LI        | Power Markets            | Review       | Solar Liberty Feed-In Tariff Purchase Power Agreement | the contract administration and payment.                              | 1st Qtr   |
|    |                |                          |              |   | Evaluate the adequacy and effectiveness of internal controls to       |           |
| 9  | PSEG LI        | Power Markets            | Review       | Power Supply Invoices - Start -Up Fees                | ensure the accuracy of Start Up Fees for Power Supply Invoices.       | 1st Qtr   |
|    |                |                          |              |   | Evaluate the adequacy and effectiveness of internal controls to       |           |
|    |                |                          |              | Purchase Power Agreement - Service Agreement True-    | ensure the completeness, accuracy and timeliness of Purchase          |           |
| 10 | PSEG LI        | Power Markets            | Review       | Ups   | Power Agreement Service Agreement True-Ups.                           | 4th Qtr   |
|    |                |                          |              |   | Evaluate the adequacy and operating effectiveness of processes        |           |
|    |                |                          |              |   | and controls covering maintenance of LIPA's Inside Plant electric     |           |
| 11 | PSEG LI        | T&D                      | Audit        | Electric Infrastructure Maintenance                   | infrastructure.   | 1st Qtr   |
|    |                |                          |              |   |   | 1st - 4th |
| 12 | LIPA & PSEG LI | LIPA & PSEG LI           | Audit        | NorthStar Management Action Plans Audit               | Audit of the completed NorthStar Management Audit Action Plans.       | Qtrs      |
|    |                |                          |              |   | Perform an assessment of the operating effectiveness of LIPA's        |           |
| 13 | LIPA           | LIPA                     | Audit        | Cybersecurity   | Cybersecurity Policies and Procedures.                                | 4th Qtr   |
|    |                |                          |              |   |   |           |
|    |                |                          |              |   | Evaluate the adequacy and effectiveness of key internal controls      |           |
| 14 | LIPA & UDSA    | LIPA &UDSA               | Audit        | LIPA & UDSA Internal Control Testing                  | for LIPA and UDSA's Business Processes.                               | 4th Qtr   |



# 2019 PSEG Long Island Proposed Audit Plan

Finance & Audit Committee

December 19, 2018





# 2019 PSEG Long Island Internal Audit Plan- Audits

| # | LOB                  | Audit Entity                                   | Scope Description  |
|---|----------------------|--|--|
| 1 | T&D                  | Fixed Asset<br>Reporting                       | Evaluate certain key processes pertaining to categorization of work orders<br>between capital and Operations & Maintenance (O&M); Closeout of work<br>orders for completed capital projects, including timely and accurate recording<br>of fixed asset additions and retirements; Calculation of depreciation and<br>Allowance for Funds Used During Construction (AFUDC); Assessment for asset<br>impairments and Asset Retirement Obligations (ARO). |
| 2 | T&D                  | Vegetation<br>Management                       | Evaluate controls in place to plan, track and manage vegetation management activities, including compliance with applicable laws and regulations.  |
| 3 | Customer<br>Services | Customer Billing                               | Evaluate the design and effectiveness of processes and controls to ensure<br>accuracy, completeness and validity of billing calculations, timely handling o<br>billing exceptions, authorized changes to Customer Accounting System (CAS),<br>accuracy of recording of accounts receivable in SAP, and key spreadsheets are<br>protected.  |
| 4 | Business<br>Services | Storm Compliance                               | Ensure the validity of storm costs and that they were properly billed to LIPA.<br>Additionally, ensure policies and procedures are in place, that they are<br>current, and that they are being adhered to.   |
| 5 | Business<br>Services | Health & Welfare<br>Benefits<br>Administration | Ensure the integrity of the PSEG LI benefits program and review member eligibility to ascertain there is oversight by HR of the various third party service provider contracts.  |
| 6 | Business<br>Services | Travel & Business<br>Expense<br>Reimbursements | Ensure adherence with the Travel & Business Expense Reimbursement Policy,<br>including reasonableness of the expenses, adequacy of supporting<br>documentation, and approval of the charges prior to payment.  |



## 2019 PSEG Long Island Internal Audit Plan (continued)

| #             | LOB                                     | Audit Entity                        | Scope Description  |
|---------------|---|-------------------------------------|--|
| 7             | 7 Business Time Sheet                   |                                     | Evaluate certain key processes involved with time sheet management for<br>PSEG LI, including recording and approval of time in SAP, accounting for time<br>charged, change management and training.  |
| 8             | 8 T&D Spend Optimization<br>Suite (SOS) |                                     | Review roles and responsibilities for investment data entry into SOS,<br>information and scoring questions in the Investment Definition and Scoring<br>(IDS) module, processes for approving & managing SOS access (entitlement<br>reviews), training of SOS users, completeness, accuracy and consistency of<br>SOS data.   |
| 9             | Customer<br>Services                    | Customer Operations<br>- Complaints | Perform testing for compliance with NorthStar's recommendations, including:<br>use of a checklist to verify documentation for a complaint case; an integrated<br>program management approach is in use to ensure customers are provided<br>with information on available assistance programs; all complaints are<br>tracked and processed and resolved timely; implementation of a Quality<br>Assurance Program in Customer Relations to verify complaints are handled in<br>accordance with DPS requirements. |
| 10            | Customer<br>Services                    | Revenue Integrity*                  | Review current business processes and controls within this area.   |
| 11            | T&D                                     | Environmental<br>Permitting         | Review written process documentation for the different job types and<br>associated notification requirements; assess operating effectiveness of<br>process improvements made subsequent to the formal investigation; review<br>automated controls in SAP re: release of jobs to construction, including<br>capture of construction start date in SAP; review process for tracking<br>environmental permitting reviews.   |
| * Quick Impac | t Audit                                 |                                     |  |



# 2019 PSEG Long Island Internal Audit Plan (continued)

| #  | LOB | Audit Entity                           | Scope Description   |
|----|-----|--|---|
| 12 | T&D | Project Planning and<br>Management     | Review process for capital project creation, project management processes, project scheduling, estimating, and compliance with NorthStar recommendations and improvement actions.   |
| 13 | T&D | Work Management                        | Ascertain that an integrated work management system is in place and there<br>is a full compliment of staff to support it; ensure there is an easy-to-use<br>format for employees and contractors; ensure there is real-time reporting of<br>capacity utilization; that processes for establishing workforce levels and<br>criteria for adding contractor capacity are in place; there are reports on trends<br>in work load levels, workforce productivity and utilization; there are formal<br>work management practices in engineering and design.  |
| 14 | T&D | NorthStar                              | Ascertain that the the recommendations provided in the NorthStar<br>Management Audit Report have been satisfactorily addressed by the<br>business.  |
| 15 |     | Outreach and<br>Communications         | Ensure capital project outreach efforts are cost-efficient, on target and<br>achieving results; evaluate the use and effectiveness of communications<br>with customers on scheduled tree trim routes; determine the effectiveness of<br>outreach efforts for the energy efficiency and low-income program; ensure the<br>process for determining the outreach budgets for capital projects has been<br>formalized; determine whether the External Affairs Handbook has been<br>properly updated and that the External Affairs' training program has been<br>formalized; ensure all meetings with impacted officials are documented;<br>determine whether capital project-related outreach efforts provide specific<br>details regarding the work performed. |
| 16 |     | Advanced Meter<br>Infrastructure (AMI) | Evaluate the AMI implementation/rollout, including controls over deployment<br>and setup of meters, Back Office architecture / support, and data security and<br>usage.   |



## 2019 PSEG Long Island Internal Audit Plan - Reviews

| # | Review  | Description   |
|---|---|---|
| 1 | Background Checks                                 | <ul> <li>Ensure background checks are conducted on new hires and contractors</li> <li>Ascertain appropriate measures are in place for addressing failed background checks, including potential for rescinding job offer</li> <li>Ensure compliance with federal and state laws and adoption of industry best practice</li> </ul>  |
| 2 | Asset Inventory                                   | The A&R OSA stipulates PSEG LI will provide LIPA on an annual<br>basis: i) An annual audit of capital improvement made in the<br>prior contract year. The audit scope shall include the accuracy<br>of plant records, maps, and asset maintenance databases. ii)<br>Physical inventory of all capital assets from time to time. iii)<br>Starting in 2019, PSEG LI Project Management Office, Training<br>Support & Contract Services, and the Electric East & West<br>Divisions will prepare a list of capital projects implemented in<br>the prior year. Internal Audit will select a sample of projects<br>from the listings and test to ascertain they are properly<br>reflected in the appropriate systems. |
| 3 | Emergency Response<br>Training                    | Asertain that Emergency Response Training has been<br>completed for all employees, as required. In addition, ensure<br>the Emergency Response Training in the ERP has been updated<br>to identify the type of training and frequency by position.   |
| 4 | PV Net Strings Process                            | Review to ascertain proper controls are in place as the process involves interaction with external organizations.   |
| 5 | Purchase and Storm Cards<br>(Continuous Auditing) | Select a sample of transactions and test for appropriateness and compliance with the Purchase and Storm Card Program.   |

