Deloitte.

Utilities Regulation & Competition Authority (URCA)
Annual Review 2020

October 28, 2021

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Draft Issuance	Final Issuance	Re-issuance
July 30, 2021	August 17, 2021	October 28, 2021

Background

Deloitte acted as an agent of the Audit Committee with the aim of assisting to meet the following legislative requirements:

Section 33 (2) of the Utilities Regulation and Competition Authority Act (URCA) states:

"The audit committee shall —

(c) report to the board within four months of publication of URCA's annual report on —

    i.   URCA's performance against its annual plan; and

    ii.   the extent to which URCA's deployment of its financial resources has delivered value for money."

And, section 33 (4) states:

"URCA shall publish, in accordance with section 10, the Audit Committee's report within two months of it being delivered to the board."
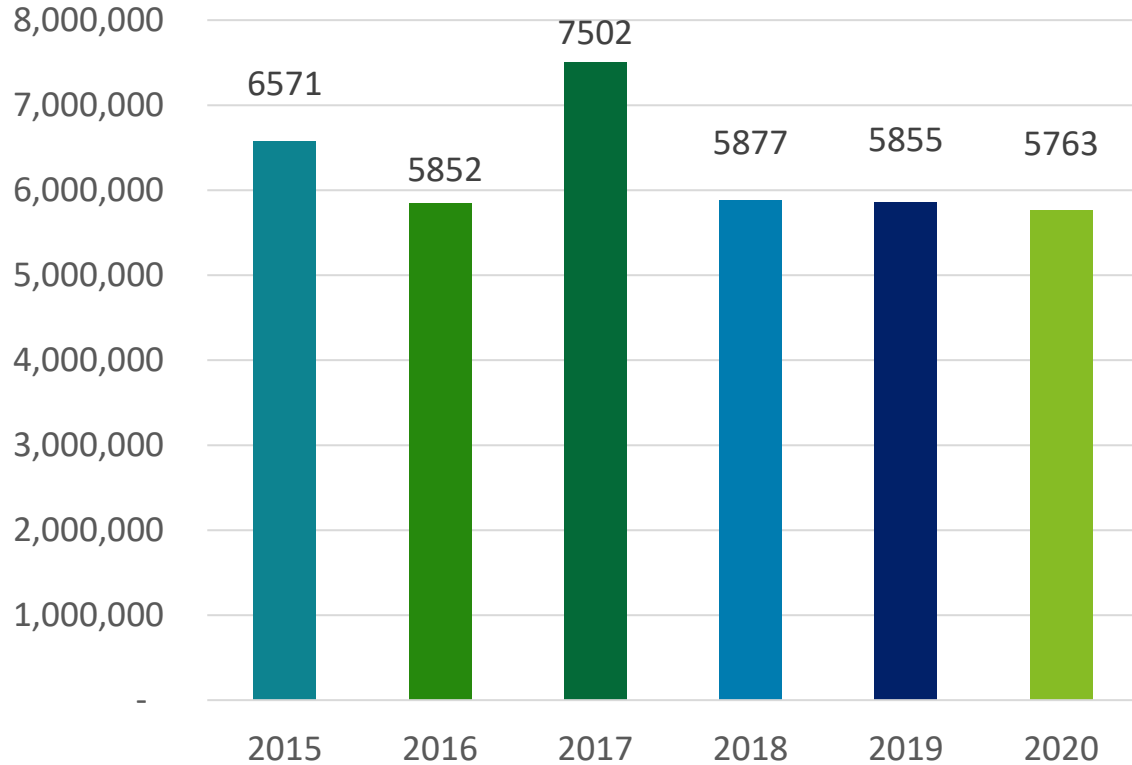
Limitation:

The accuracy of the results of this review is heavily dependent on the information received from management as well as the information contained in the 2020 annual report.
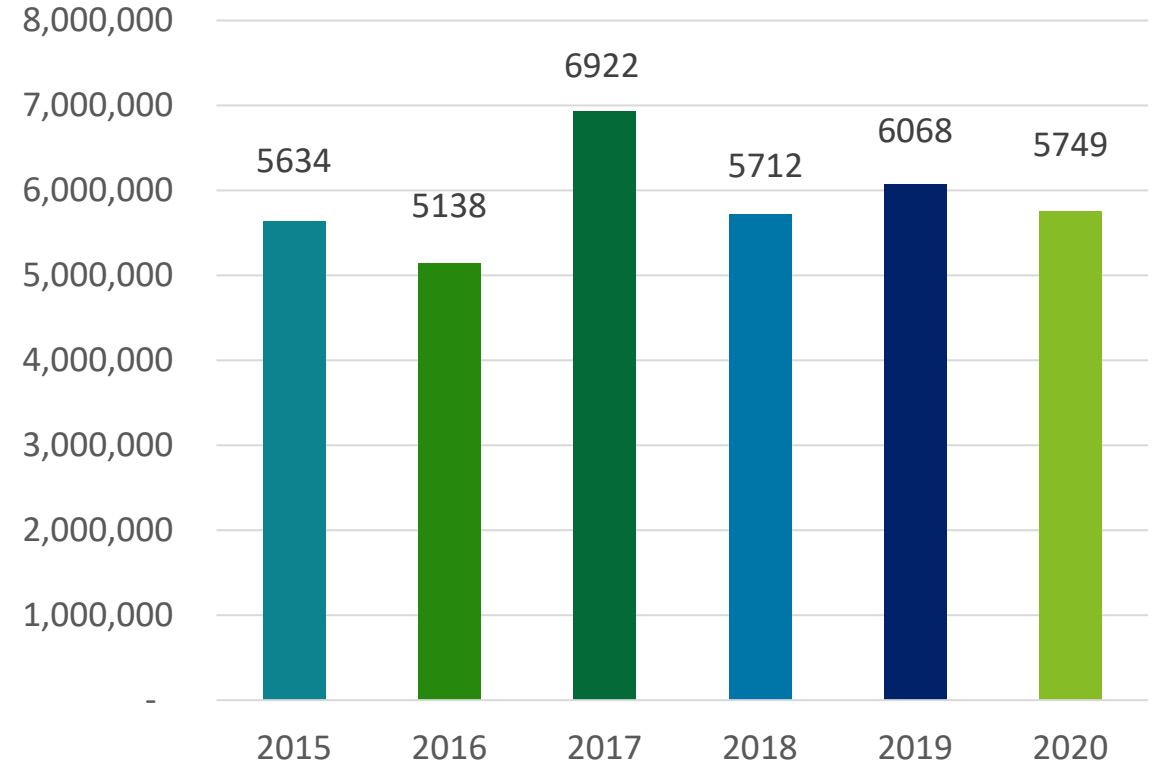
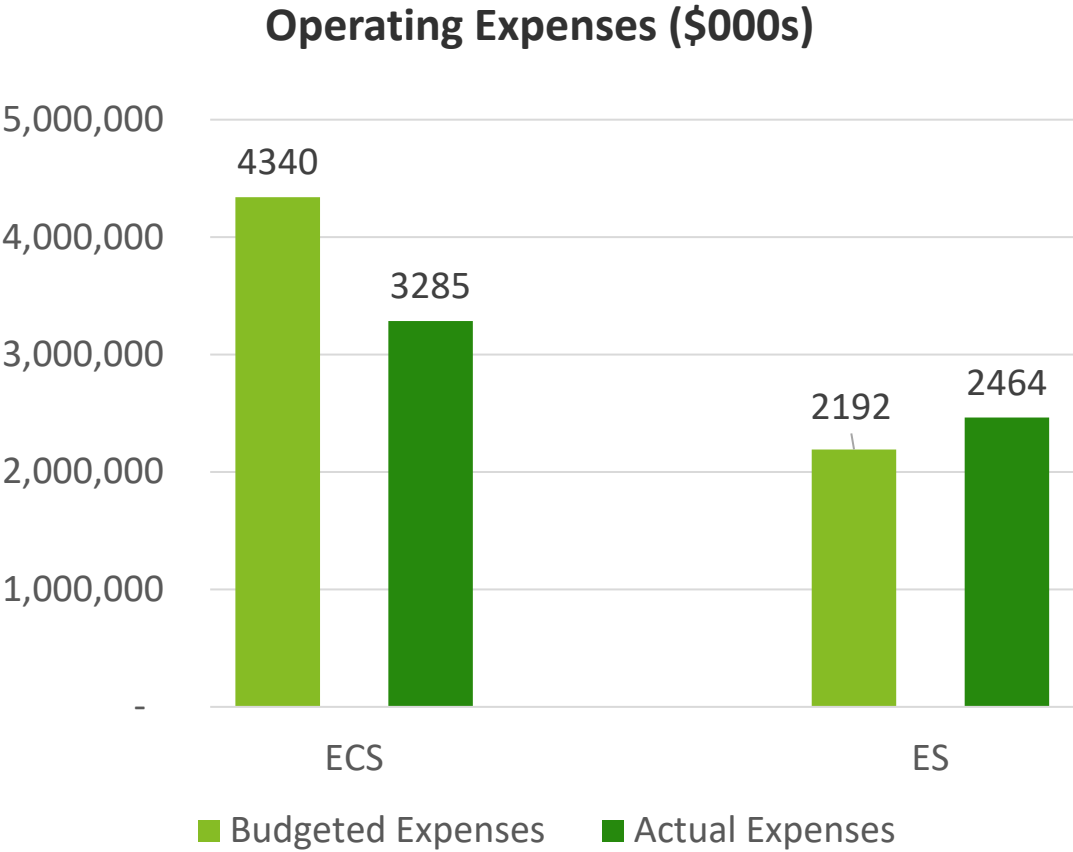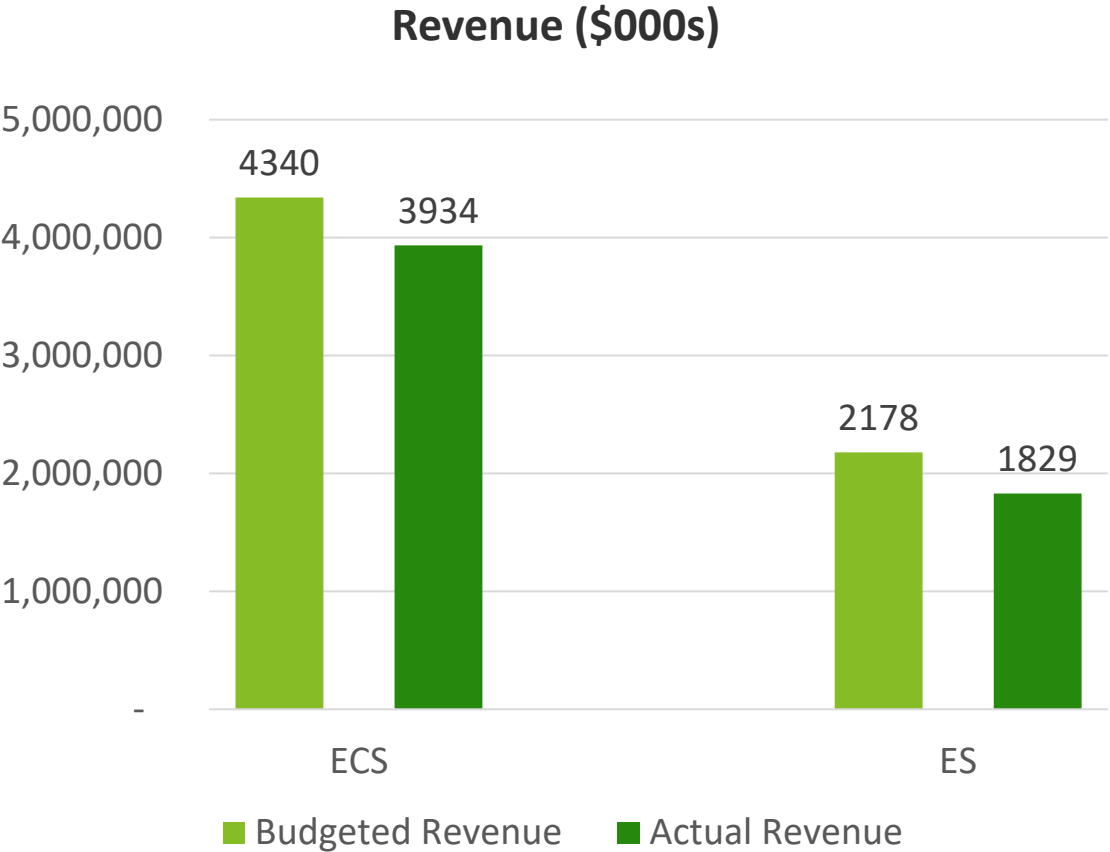# Income Statement Analysis

Actual Revenue & Expenses

Revenue

Operating Expenses

Source: Actual v Budget 2020

Budgeted vs. Actual Revenue & Expenses (FY '20)

Revenue ($000s)

Legend: ■ Budgeted Revenue ■ Actual Revenue

- ECS: Budgeted 4340, Actual 3934
- ES: Budgeted 2178, Actual 1829

Operating Expenses ($000s)

Legend: ■ Budgeted Expenses ■ Actual Expenses

- ECS: Budgeted 4340, Actual 3285
- ES: Budgeted 2192, Actual 2464

- Actual revenue was 9% below budgeted for ECS, and 16% below budgeted for ES.

- For ECS, actual expenses were 24% below budgeted, and 12% above budgeted for ES. The higher operating expenses for the ES were due to considerably higher expenditure on professional services and higher provision for doubtful accounts.

Observations of Revenue & Expenses

Operating Expense to Revenue

In 2020, operating expense as a percentage of revenue decreased from **103% in 2019 to 99%.**

Reason: The operating expenses were less than the revenue in 2020.

Actual Expenses vs Budgeted Expenses

Actual expense was $782k under budget.

Reason:
The actual expense for conference, training and travel were less than budgeted as a result of COVID-19.

Revenue & Expense Analysis

Expenses: 2019 vs. 2020

Expenses decreased by **5%.**

Reason: Expenses, such as office services decreased during 2020 due to staff working remotely.

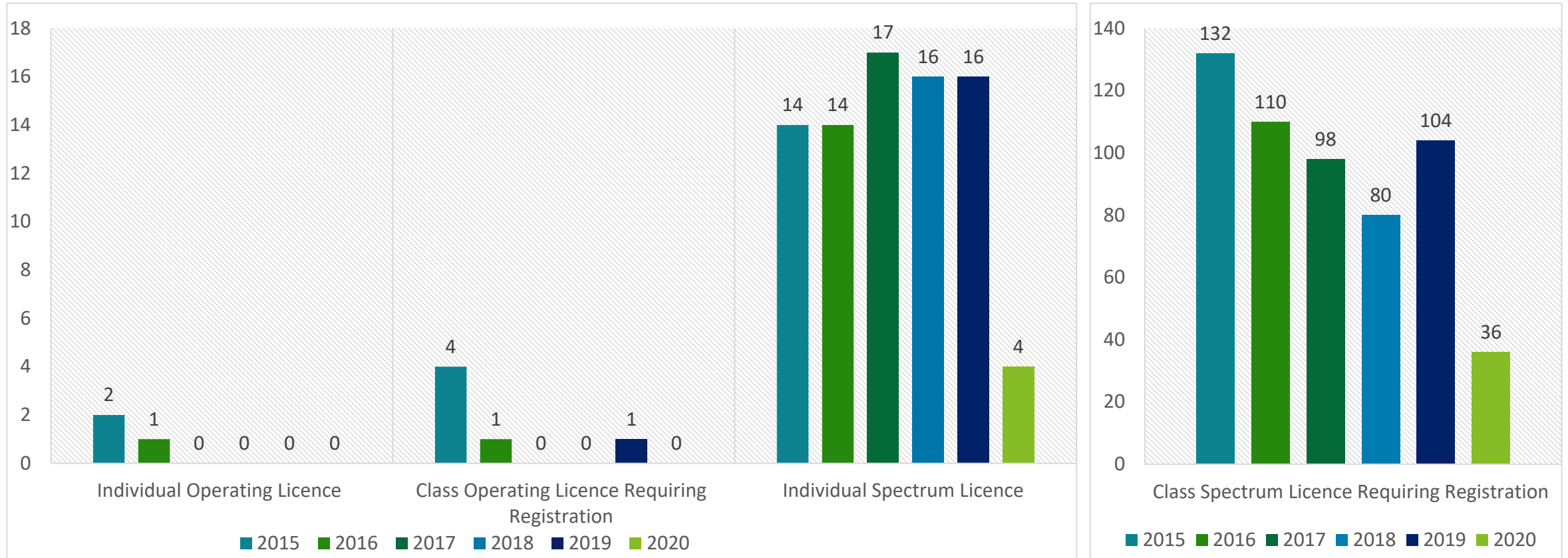**Actual Revenue vs Budgeted Revenue**

Actual income was $755k under budget.

Reason: Less revenue was posted in the Electronic Communications Sector than previously budgeted.
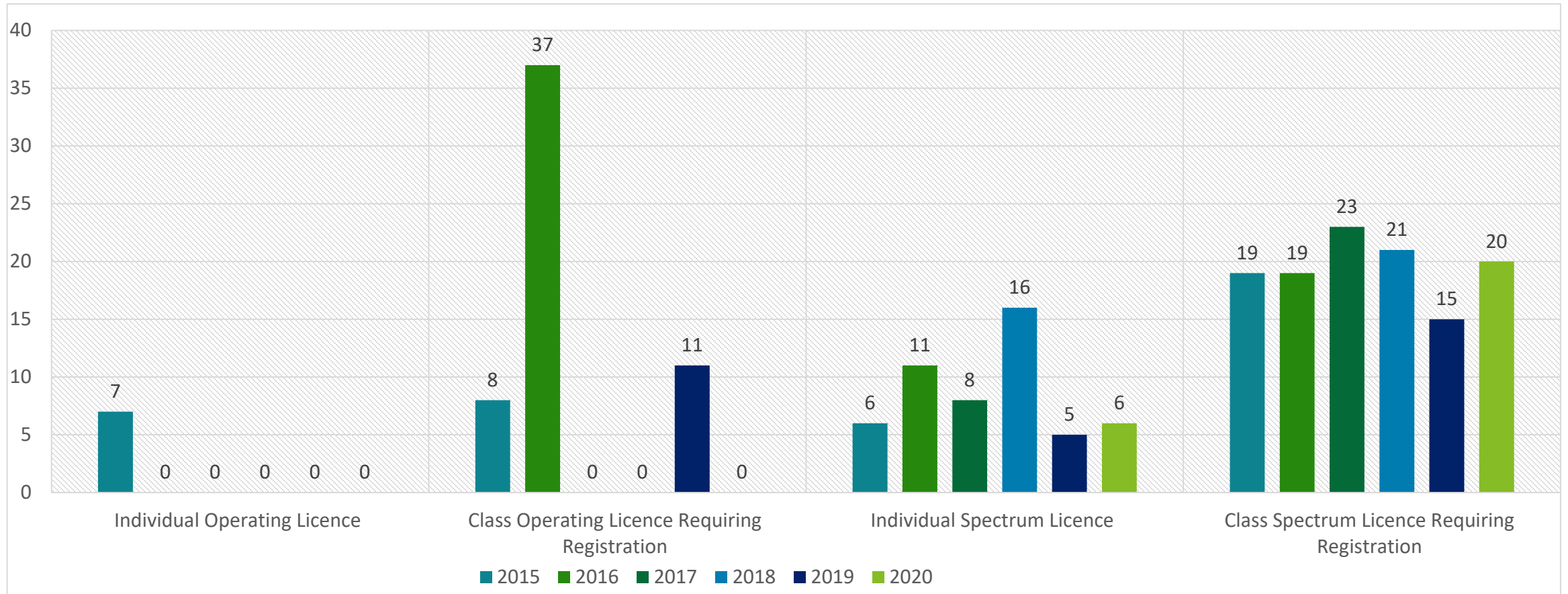
New License Analysis

Total Licenses Issued - ECS

- No Individual Operating Licenses have been issued over the past 4 years.

- There was a significant decrease in Class Spectrum licenses requiring registration issued in 2020.

Average Days to Process License Based on Classes

- All licenses issued in 2020 were issued in line with statutory required deadlines.

Summary of Results

Summary of KPI Results

Area	Key KPIs	Assessment
Statutory & Regulatory	- Final determinations to be published within 1 month from closing date for comments on preliminary determination - Number of licenses issued within required time frame	1. URCA aims to publish final determinations within one (1) month from closing date for comments on Preliminary Determination. Of the 6 Determinations in 2020, only one (1) Final Determination was published within 30 days of the end of the consultation period. 2. URCA met the statutory deadlines for processing 40 of the 43 new license applications in 2020.
Information Technology	- Organizational IT Spend	1. In the 2019 review, we noted that IT may have been underfunded based on the deficiencies identified in our Internal Audit. However, IT spend was significantly increased in 2020 and progress has been made in addressing the open findings.
Human Resources	- Annual average days for employee invested in learning and development - Cost of learning and development activity as percentage of total payroll - Cost of HR advisors as a percentage of total payroll	1. Average learning days increased in 2020, however, the cost of learning and development significantly decreased, which is due to the shift from overseas or in-person training to virtual learning as a result of the pandemic. 2. As a result of the departure of the HRA Manager, URCA leveraged its HR Consultant for additional HR support for a 6-month period, resulting in an increase in cost for consultant services.
Consumer Relations	- Number of complaints received - % of total complaints resolved	1. The number of complaints received in the current year increased by 4% compared to the prior year. 2. There was an 89% increase in the number of complaints resolved in 2020 compared to 2019.
Finance	- Cost of licensee invoicing - Value of adjustments	1. There was a $15 increase in licensee invoicing costs due to staff salary increases. 2. Total adjustments in 2020 were valued at $262,000 compared to $3,000 in 2019.

Other Key Results

Description	Assessment
Publication of Annual Plan and Annual Report	URCA met the statutory deadlines specified by Section 41 (1) of the URCA Act for publication of its Annual Plan and Annual Report.
Achievement of targeted 'end-dates' for projects in the 2020 Annual Plan	Of the 14 planned projects for 2020: - 1 was achieved by the target end-date - 4 initially planned for 2020 were rescheduled to 2021 - 2 are ongoing initiatives that have been rescheduled as Tier 1 projects in 2021 - 7 have initial planned completion dates after 2020
Unresolved internal audit issues potentially impacting achievement of plans and delivery of 'value for money'	1. Compliance with Key Legislation & Regulations 2017 – A framework to regulate the Electricity Sector has not yet been formalized since the initial establishment of the sector. 2. Procurement 2014 – There is no formal criteria for inclusion of vendors on its vendor listing and no process to periodically assess current vendors on the list to ensure URCA receives value for money. 3. Corporate & Consumer Relations 2015 – Reporting to the Board on complaints and inquiries does not include items brought forward from previous months which may lead to longstanding complaints being left unresolved. Note: While Deloitte followed up on these unresolved internal audit issues, management has not defined a remediation date.

# Key Performance Indicator (KPI) Summary

Statutory & Regulatory KPI Results

Description	KPI 2018 Results	KPI 2019 Results	KPI 2020 Results	
Published Date of Draft Annual Plan and Strategy	20 December 2018	December 24, 2019	December 23, 2020	
Published Date of Annual Report and Final Annual Plan	30 April 2019	May 9, 2020	April 30, 2021	
Final determinations to be published within one month from closing date for comments on preliminary determination	Seven (7) Final Determinations issued during 2018. 0 were published within 1 month	Six (6) Final Determinations issued during 2019. 0 were published within 1 month	**ECS** – 6 **ES** – 1 Only one (1) Final Determination was published within 30 days of the end of the consultation period.	
Document with the public consultation timeline & percentage of public consultations started within period stated in Annual Plan	50%	50%	**ECS** – 60%	**ES** – 33.3%
Document with the time to publish results, decisions, and other regulatory measures after close of consultation • 45 – 60 days • 60 – 90 days • >90 days	2 1 7 Total publications: 10	**Consolidated** 26 2 3 *Total publications: 31*	**ECS** 2 1 3 *Total: 6*	**ES** 2 1 1 *Total: 4*
Number of licenses issued within required time frame • 30 days for individual licenses • 45 days for class licenses	16 80 Total Licenses: 96	**Consolidated** 17 104 *Total Licenses: 121*	**ECS** 4 36 *Total: 40*	**ES** 0 0 *Total: 0*
Volume of licenses processed in the year	96	121	**ECS** - 40	**ES** - 3

Statutory & Regulatory KPI Trend Analysis

Volume of Licenses Processed Annually
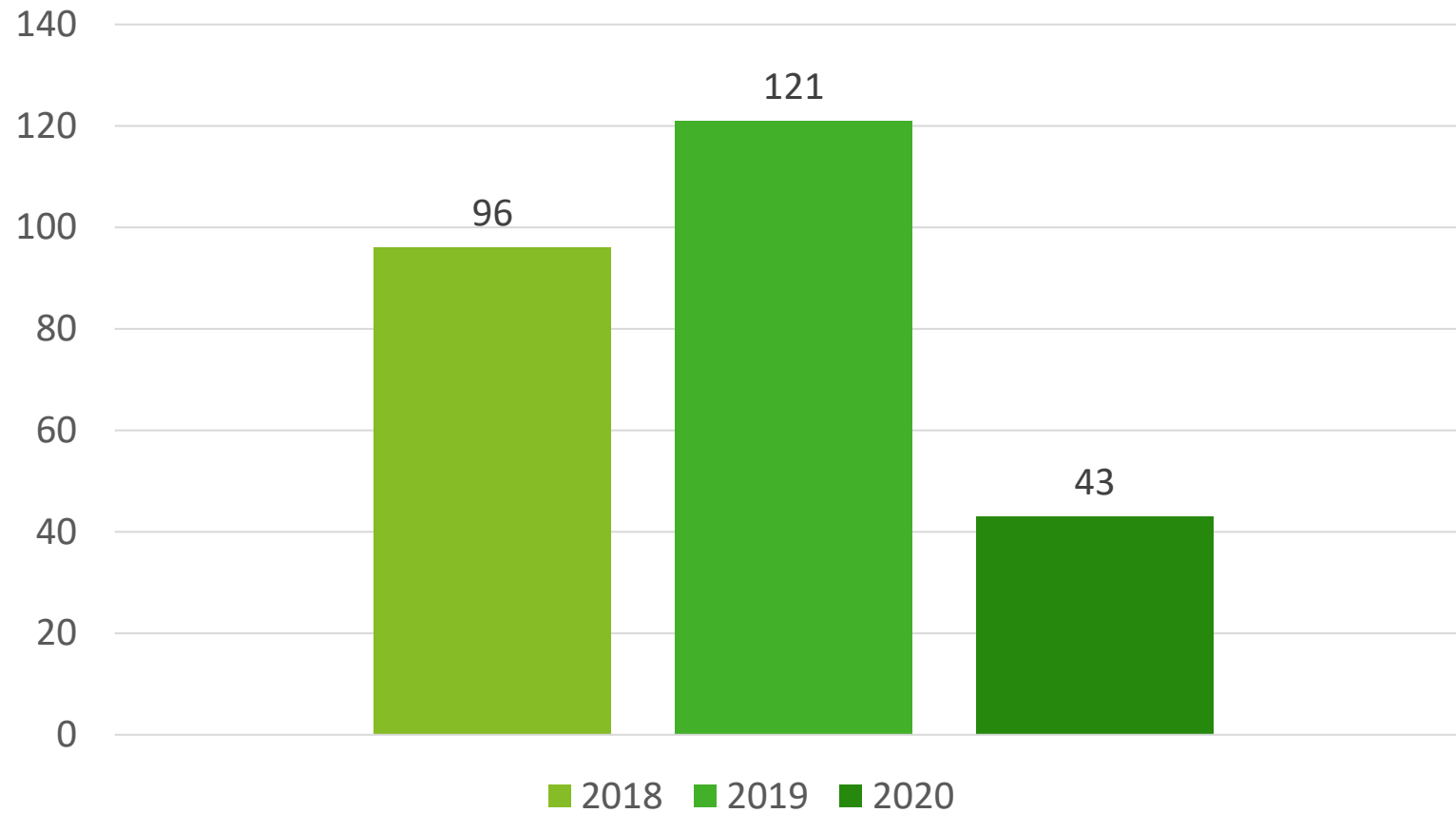
Information Technology KPI Results

Description	2015	2016	2017	2018	2019	2020
Cost of IT function as a percentage of total expenditure	0.5%	1.3%	1.4%	1.3%	1.4%	1.7%
Organizational IT spend (investment in IT infrastructure & hardware across the organization per user)	$2,164	$4,270	$2,575	$1,532	$258	$1,768
Percentage of employees who are able to access the network and system remotely	100%	100%	100%	100%	100%	100%
Percentage of overall organizational cost invested in Information and Communication Technology annually (upgrades, new equipment etc.)	N/A	N/A	N/A	N/A	N/A	0.68%

Insights:

Cost of IT Function — Relatively stable over the last three years.

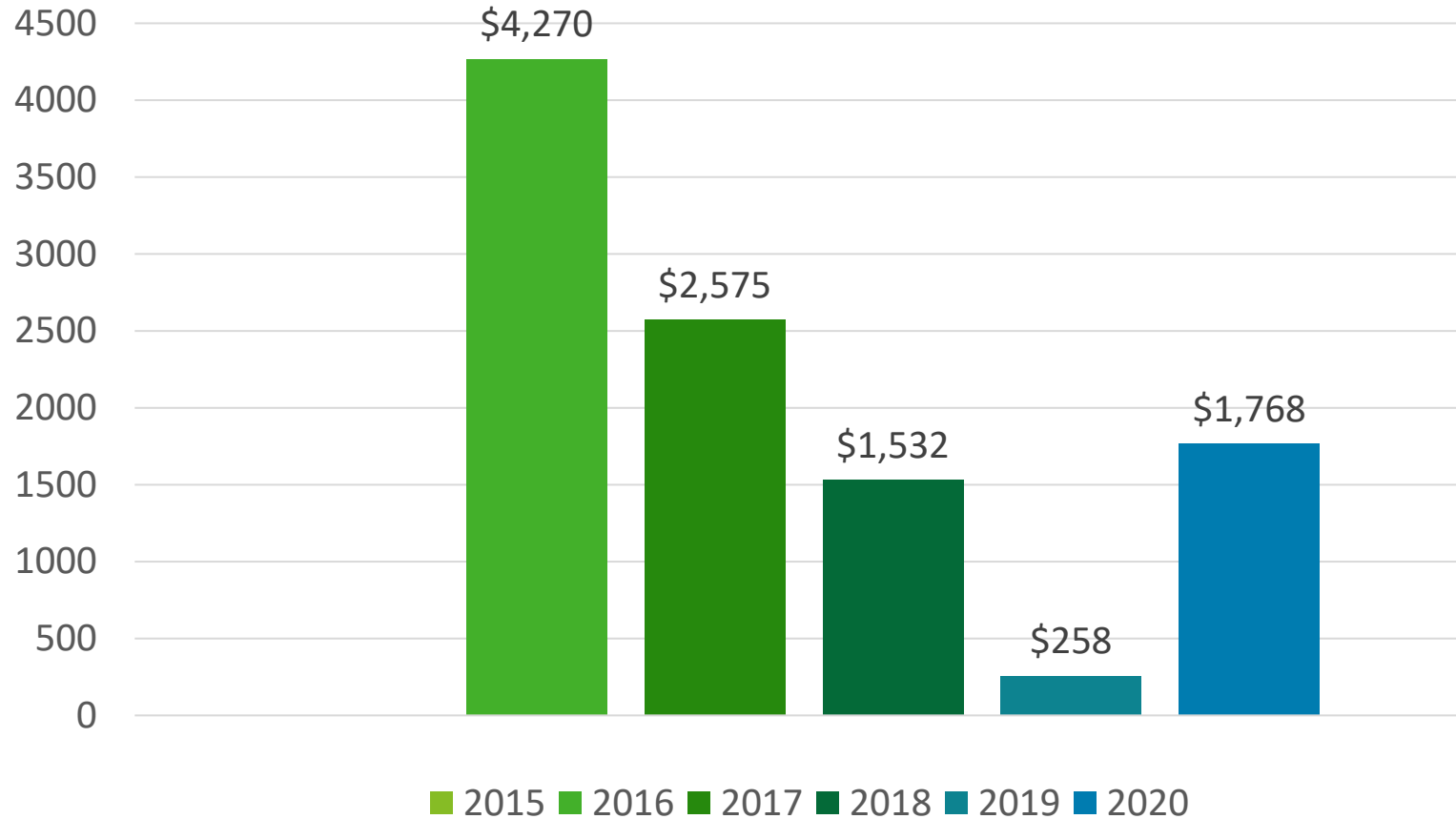**Organizational IT Spend** — In the 2019 review, we noted that IT may have been underfunded based on the deficiencies identified in our Internal Audit. However, IT spend was significantly increased in 2020 and progress has been made in addressing the open findings.

% Organizational Cost in IT — New KPI established in 2020.

# Information Technology KPI Trend Analysis

Organizational IT Spend

Human Resources KPI Results

| Description	2015	2016	2017	2018	2019	2020	Management Insights:
Cost of HR function as a percentage of expenditure	4.9%	5.1%	4.4%	5.9%	6.4%	6.4%	N/A – No material changes.
Cost of HR function per employee	$12,588	$11,233	$10,881	$11,742	$12,880	$12,101	N/A – No material changes.
Ratio of employees to HR staff	8.66:1	7.75:1	7.00:1	5.60:1	9.60:1	10:1	N/A – No material changes.
Annual average days for employee invested in learning and development	4.4	5.2	4.3	8.0	5.8	9.0	At the onset of the pandemic, URCA provided many opportunities for online learning for its staff.
Turnover rate	0%	30%	0%	7%	14%	9.8%	Turnover rate decreased significantly since 2019.
Cost of learning and development activity as percentage of total payroll	5.6%	5.5%	5.4%	8.0%	7.0%	1.6%	The shift from overseas or in-person training to virtual learning as a result of the pandemic led to a significant decrease in L&D costs.
Cost of HR advisors as a percentage of total payroll	8.50%	0.00%	0.22%	0.53%	1.18%	12.5%	As a result of the departure of the HRA Manager, URCA leveraged its HR Consultant for additional HR support for a 6-month period, resulting in an increase in cost for consultant services.
Percentage of roles filled by permanent and contract staff	Not reported	Not reported	89.3%	89.3%	93.1%	92%	N/A – No material changes.
Average lapse time (working days) for vacancy	119	90	86	104	98	180	As a result of COVID-19 lockdown orders, the recruitment process was suspended until URCA was able to switch to a fully virtual process.
Average sick days per employee	6.8	3.2	Not reported	3.9	4.3	1.8	Average sick days per employee reduced by more than half.
Percentage of people in role after 12 months of service	100%	100%	100%	100%	80%	100%	This KPI has returned to expected levels.
Percentage of eligible staff who received performance appraisal	100%	100%	100%	100%	100%	N/A	Performance appraisals were not performed consistently in 2020 as a result of the COVID-19 pandemic and departure of HRAM.

Human Resources KPI Trend Analysis

Cost of Learning & Development
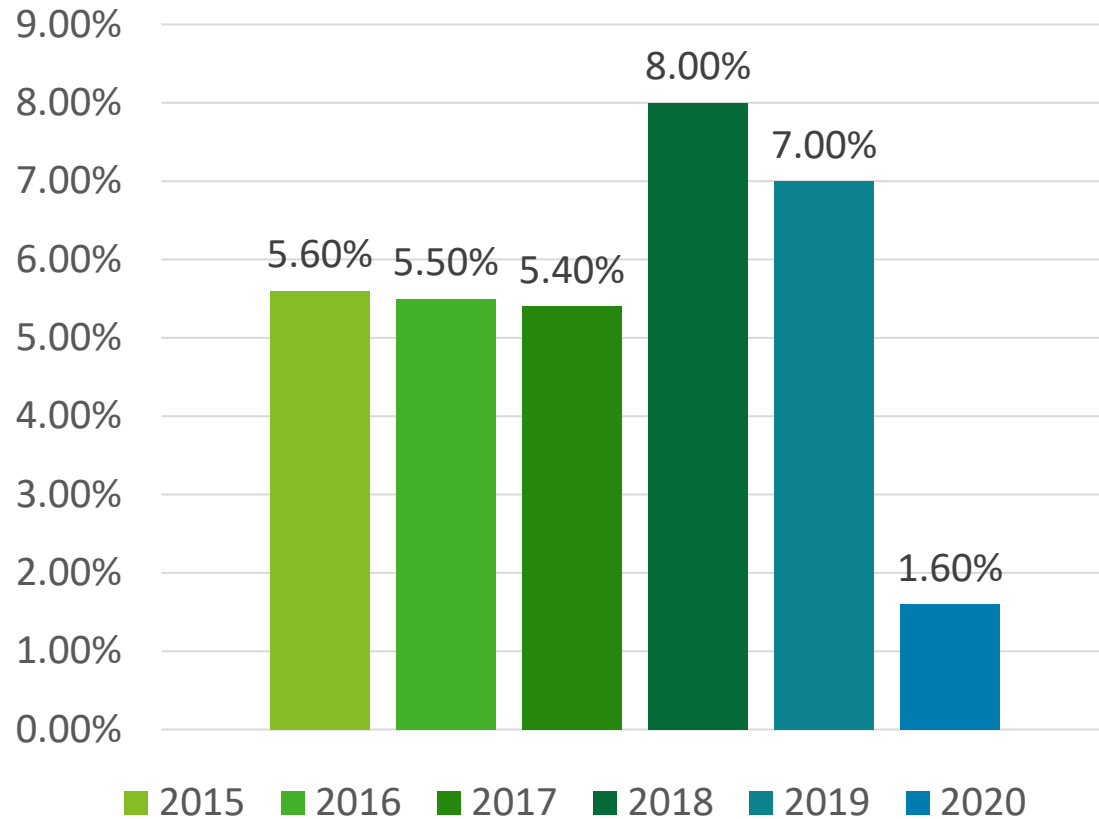
- *Cost of learning and development activity as percentage of total payroll*
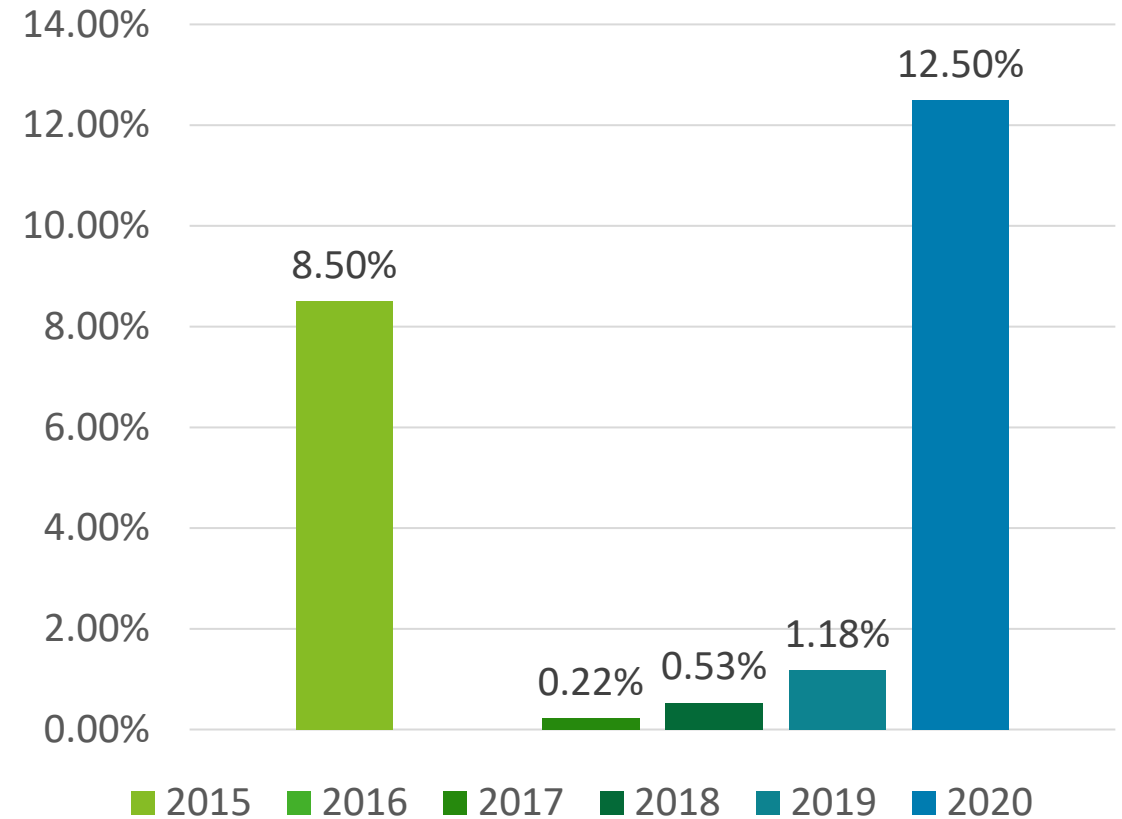
Cost of HR Advisors

- *Cost of HR advisors as a percentage of total payroll*

Consumer Relations KPI Results

Description	KPI 2018 Results	KPI 2019 Results	KPI 2020 Results
Number of Consumer Complaints received	48	72	75
Percentage of total complaints resolved	87.5%	44%	81.33%
Average time taken to resolve complaints	18 days	18 days	18 days

Insights:

Percentage of total complaints resolved

We noted that there was an 89% increase in the number of complaints resolved in 2020 compared to 2019.

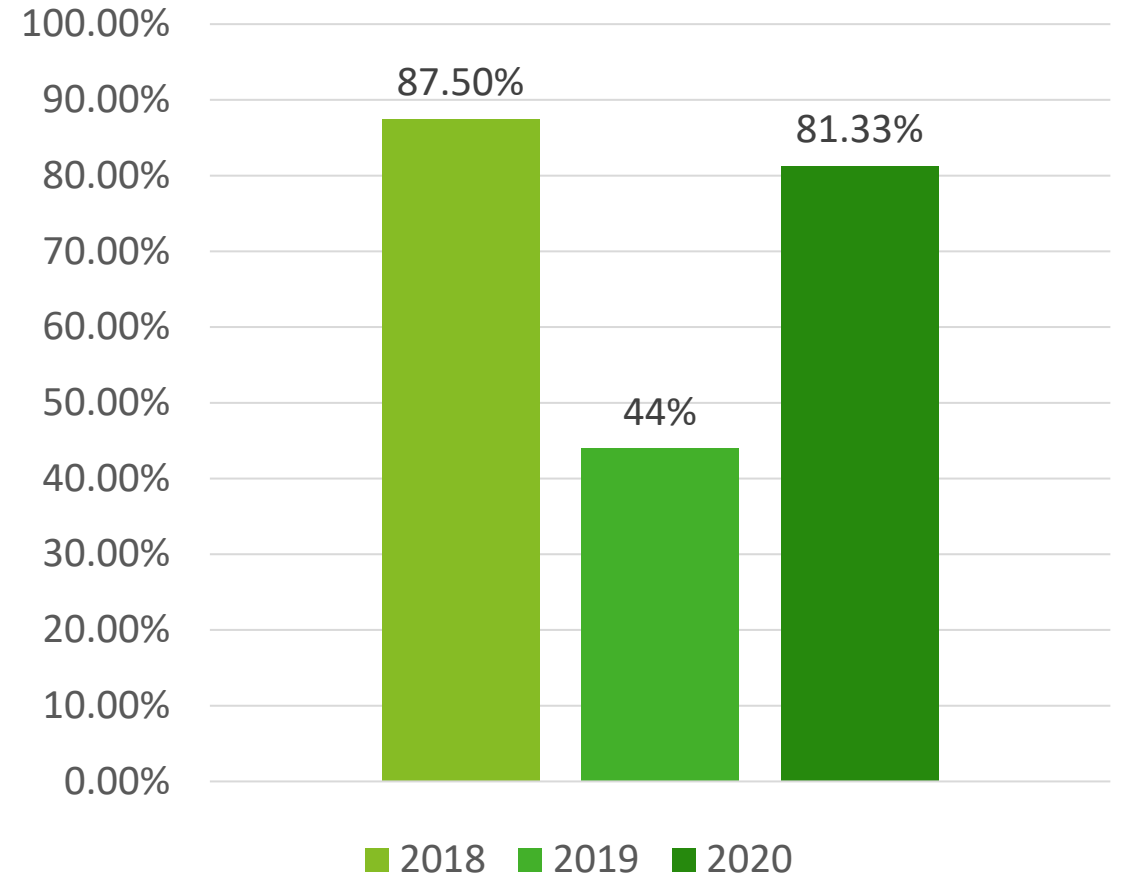**Average time taken to resolve complaints**

The amount of time taken to resolve complaints includes liaising with relevant service providers.

Consumer Relations KPI Trend Analysis

Number of Complaints Received
- 2018: 48
- 2019: 72
- 2020: 75

Percentage of Total Complaints Resolved
- 2018: 87.50%
- 2019: 44%
- 2020: 81.33%
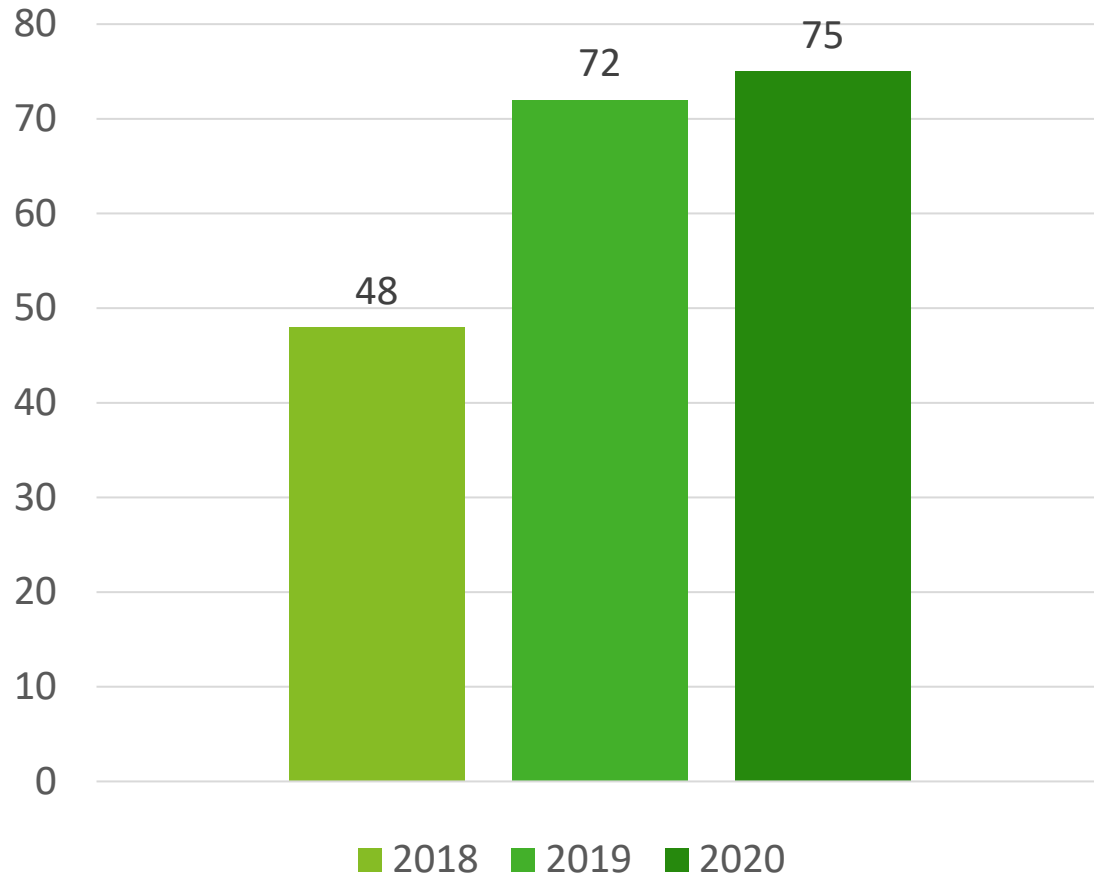
Finance KPI Results

KPI	2015	2016	2017	2018	2019	2020	Management Insights:
Cost of Finance Function (in relation to the total operating expenditure)	4.20%	4.40%	4.66%	6.21%	5.39%	6.81%	N/A – No material changes.
Period-end cycle time	9	13	22	15	18	35	Management noted the Finance department had some inefficiencies while making the transition to work-from-home, which affected this KPI.
Year-end cycle time	36	33	27	31	26	24	N/A – No material changes.
Forecasting accuracy	-6.30%	19.29%	15.58%	18.15%	20.21%	25.66%	N/A – No material changes.
Cost of licensee invoicing	$141.00	$136.28	$105.65	$98.53	$120.42	$135.56	N/A – No material changes.
Debtor Days	17	29	28	39	50.1	60.4	Debtor days increased slightly as a result of the pandemic.
Number of billing adjustments	7	10	3	0	3	1	N/A – No material changes.
Value of adjustments	$11,694	$246,790	$27,526	$0	$3,172	$262, 277	The total adjustments in 2020 relate to URCA's fees from Cable Bahamas that were adjusted due to improper inclusion of non-regulated services revenue in the fee calculation, which URCA corrected after being notified.
Longstanding debt	99.81%	100.00%	97.95%	99.74%	100.00%	100.00%	All of the longstanding receivables relate to Cable Bahamas and Grand Bahama Power Company. There are ongoing legal cases against both entities.

Finance KPI Trend Analysis

Cost of Licensing

- $141.00
- $136.28
- $105.65
- $98.53
- $120.42
- $135.56

Legend: 2015, 2016, 2017, 2018, 2019, 2020

Value of Adjustments

- $11,694
- $246,790
- $27,526
- $3,172
- $262,277

Category 1

Legend: 2015, 2016, 2017, 2018, 2019, 2020
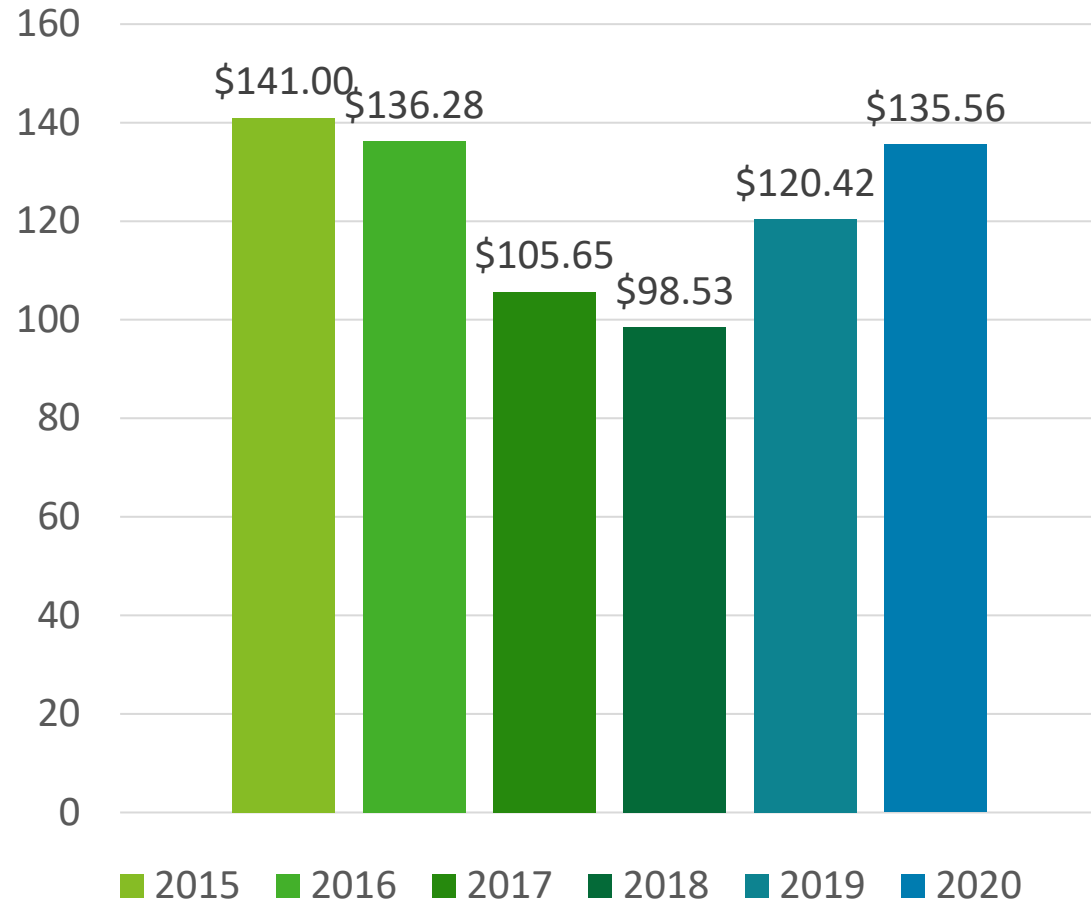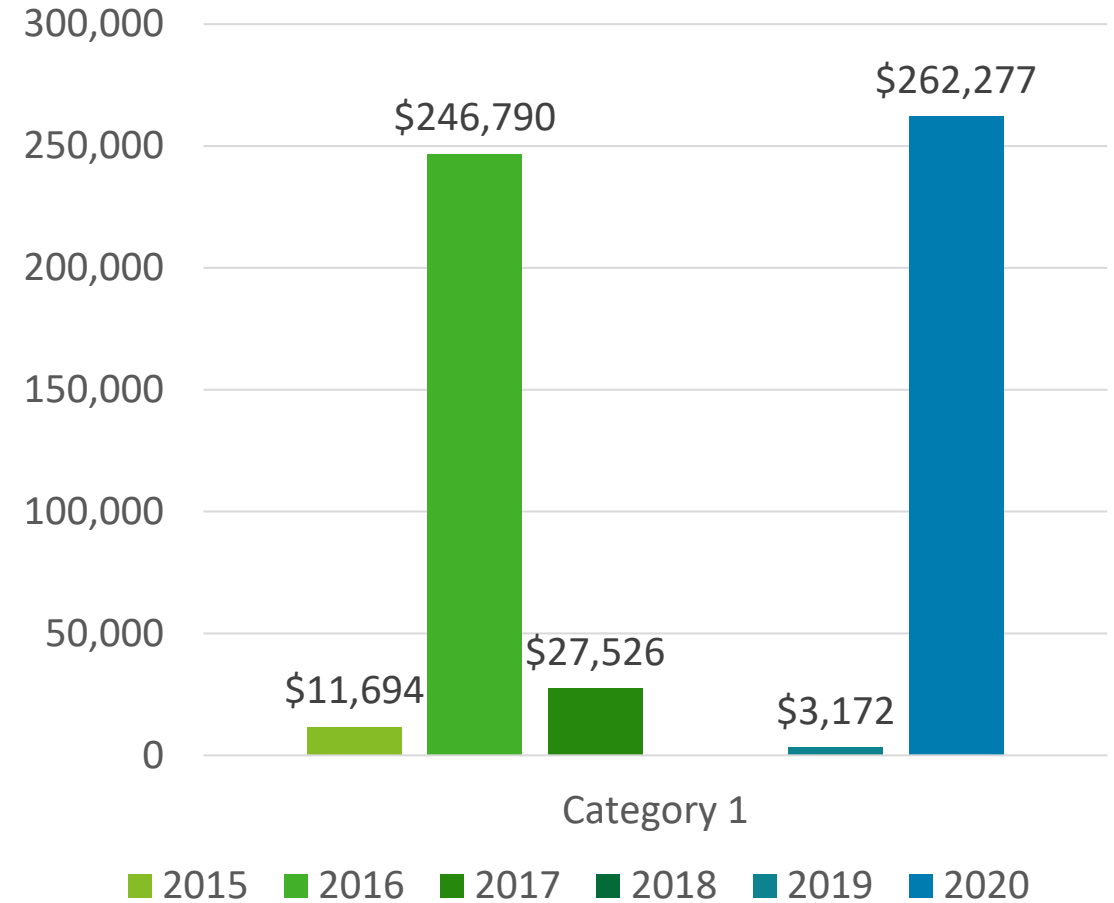
KPI Recommendations

KPI Recommendations

Area	KPI	Recommendation
N/A – All Areas	N/A – All KPIs	KPI targets should be identified for all departments to help drive internal momentum and efficiency to achieve desired results.
Information Technology	N/A	The current IT KPIs appear to be key metrics rather than performance indicators. URCA should consider the following IT KPIs, which may provide more valuable insight into the performance of this function: - Server downtime and average time to repair - IT ROI - Average time for consultant resolution of support tickets
Human Resources	N/A	As published in our HR Recruitment and Retention Internal Audit Report, URCA should consider the following HR KPIs related to HR's high-risk areas (recruitment and retention): - Employee satisfaction index - Voluntary vs involuntary termination rate - Number of successors on key posts - Posts filled by internal sources
Consumer Relations	Number of complaints received	URCA should consider whether this is an appropriate KPI as URCA management cannot control the number of complaints received, but rather it appears to be a key metric.
	N/A	As published in our Complaint Management and External Communications Internal Audit Reports, URCA should consider the following CCR KPIs: - Communication response time - Social media engagement - # of individuals at events - Complaints unresolved for a specific period - Customer satisfaction score

Project Analysis

Key Value-Delivering Activities by Sector

Electronic Communications (ECS)

- Reviewed and established regulatory obligations on the wholesale Dedicated Internet Access services.

- Completed the framework for the Internet Exchange Points in The Bahamas.

- Established a three-year glide path based on benchmarking for determining fixed and mobile termination rates.

Electricity Sector (ES)

- Completed and published the ES Licensee Data Reporting and Performance Monitoring guidelines.

- Approved of Renewable Energy Self Generation projects to provide renewable energy technologies for government and business enterprises.

- Established the Consumer Protection Regulations for the Electricity Sector in The Bahamas.

Statistical Summary of External Projects

Description	2019
Projects brought forward from 2017*	3
Projects brought forward from 2018*	8
Add: New Projects started in 2019**	10
Total Projects Targeted for Completion in 2019	**21**
Less: Projects not Completed in 2019***	(14)
Total Projects Completed in 2019	**7**
Total Projects started in 2019 Targeted for Completion in 2020 – 2021	**2**
Total New 2019 Planned Projects	**12**

Description	2020
Projects brought forward from 2017*	2
Projects brought forward from 2018*	5
Projects brought forward from 2019*	8
Add: New Projects started in 2020**	7
Total Projects Targeted for Completion in 2020	**22**
Less: Projects not Completed in 2020***	(10)
Total Projects Completed in 2020	**12**
Total Projects started in 2020 Targeted for Completion in 2021 – 2023	**7**
Total New 2020 Planned Projects	**14**

*Only includes projects with anticipated or revised completion dates in 2019

**Does not include new projects with anticipated completion after 2019 or ongoing projects with no completion date

***Only includes projects with anticipated completion in 2019

*Only includes projects with anticipated or revised completion dates in 2020

**Does not include new projects with anticipated completion after 2020 or ongoing projects with no completion date

***Only includes projects with anticipated completion in 2020

2017-2019 General Projects Carried Over

Project	Start Date	Anticipated Completion Date	Revised Completion Date	Actual Completion Date	Was Date Met?
Review of Consumer Protection Regulations	T2, 2018	T3, 2020	N/A	T3, 2020	Yes
Implementation of OPI – Phase 1	T3, 2019	T3, 2020	2022	N/A	No
Market Surveys	T3, 2018	2020	2021	N/A	No

2017-2019 Projects Carried Over for Electronic Communication Sector

Project	Start Date	Anticipated Completion Date	Revised Completion Date	Actual Completion Date	Was Date Met?
ICTs for Disaster Preparedness and Management	T1, 2017	T2, 2019	T3, 2020	T3, 2020	Yes
Review of ECS Policy	T1, 2017	T2, 2019	T1, 2020	T2, 2020	Yes
Review of Wholesale Internet Access	T1, 2018	T2, 2019	T2, 2020	T2, 2020	Yes
Review of Broadcasting Content Code	T2, 2018	T3, 2019	T2, 2020	T2, 2020	Yes
Market Review – Mobile Services	T1, 2019	T2, 2020	T3, 2021	N/A	No
National Spectrum Plan	T1, 2019	T1, 2020	N/A	T1, 2020	Yes
Addendum to Review of Interconnection Rates –Proposed Cost Mode	T1, 2019	T3, 2019	2020	T2, 2020	Yes
Framework for Internet Exchange Points (IXP) for The Bahamas	T1, 2018	T2, 2020	N/A	T2, 2020	Yes
ICTs for Persons with Disabilities	T2, 2018	Ongoing	Ongoing	Ongoing	N/A
Review of Project – Market Reviews Implementation of Price Caps	T1, 2019	T3, 2019	2020	T3, 2020	Yes
Framework for Public Service Broadcasting	T1, 2019	N/A	2021	N/A	No
Market Review – Fixed Services (Incl. Pay TV)	T3, 2019	2022	2022	N/A	No

2017-2019 Projects Carried Over for Electricity Sector

Project	Start Date	Anticipated Completion Date	Revised Completion Date	Actual Completion Date	Was Date Met?
SSRG Advancement Program	T1, 2018	Ongoing	Ongoing	N/A	N/A
Promotion of Energy Efficiency and Conservation	T2, 2019	Ongoing	Ongoing	N/A	N/A
Establishment of ADR Scheme(s) for the ES	T1, 2019	T1, 2020	T1, 2021	N/A	No
Framework for the Procurement of Power Generation Resources	T1, 2019	T3, 2019	T2, 2020	T2, 2020	Yes
Review of BPL Fuel Charge	T2, 2019	T3, 2019	2020	T2, 2020	Yes
Renewable Energy Self Generation Guidelines	T3, 2019	T1, 2020	N/A	T1, 2020	Yes
ES Licensee Data Reporting and Performance Monitoring	T2, 2019	T3, 2019	2020	T2, 2020	Yes
Framework for Public Electricity Supplier Inspection	T2, 2019	T3, 2019	2021	N/A	No

2020 Planned Projects

Project	Start Date	Anticipated Completion Date	Actual Completion Date	Revised End Date	Was Anticipated Date Met?
USF Review – Project 1	T1, 2020	2020	N/A	T3, 2023	No
USF Review – Project 2	T1, 2020	2020	N/A	T3, 2023	No
ECS Market Surveys – Pay TV and FM Broadcasting	T1, 2020	T2, 2020	N/A	2021	No
ECS Market Surveys – Consumer Assessment	T1, 2020	T3, 2020	N/A	N/A	No
Implementation of URCA OPIs	T1, 2020	T3, 2021	N/A	N/A	No
Review of Spectrum Management	T1, 2020	T3, 2021	N/A	N/A	No
Review of Monitoring and Compliance	T1, 2020	T3, 2020	N/A	T2, 2021	No
Mobile Assessment – Feasibility of a 3rd Operator	T1, 2020	T1, 2021	N/A	T2, 2021	No
Fuel Charge Cost Recovery Regulation	T2, 2020	T3, 2020	N/A	2021	No
Framework for Public Electricity Supplier Inspections	T2, 2020	2021	N/A	N/A	No
Efficiency Audit (BPL) & Tool Development	T2, 2020	2021	N/A	T2, 2022	No
Tariff Studies & Setting Procedures	T2, 2020	2021	N/A	N/A	No
Draft Annual Plan 2021	T3, 2020	T3, 2020	T3, 2020	N/A	Yes
Market and Consumer Protection Surveys	T3, 2020	T3, 2021	N/A	N/A	No

2020 Unplanned Activities

Sector	Activity Type	Activity
Electronic Communications Sector (ECS)	Application Processing	Processed 28 Pricing Applications: BPL – 17 CBL – 11
	Investigation	BTC Suspected Breach of Retail Pricing Rules
		BTC Network Outage
		Mobile Number Portability Dispute (BTC & Aliv)
		Fixed Number Portability
		Infrastructure Sharing Complaint – BTC & Global Nexus
	Other	Assisting Government with Draft E-Commerce Policy
		Proposed Changes to BTC's Reference Access Interconnection Offer (BTC RAIO)
		Issuance of Additional Emergency Numbers
Energy Sector (ES)	Other	Rate Reduction Bond Legislation Review
		Cost-Based Pricing for Renewable Energy Generation Projects
		BPL's Hedging Initiative & Fuel Charge Opinion
		Consumer Protection Regulations for the ES in the Bahamas

Consultation Analysis

Planned Consultation Results

	Initial Anticipated Publication Period	Actual (*Revised) Publication Period	Anticipated Completion Period	Actual Closing Period
Draft Annual Plan 2021	T3, 2020	T3, 2020	T3, 2020	T1, 2021
Review of Consumer Protection Regulations	T1, 2019	T3, 2020	T2, 2020	T3, 2020
Implementation of OPI – Phase 1	T3, 2019	2022*	T3, 2020	N/A
Mobile Market Assessment – The Feasibility of a 3rd Operator	T1, 2020	T2, 2021*	T3, 2021	N/A
Review of Universal Service Framework	T1, 2020	N/A	2022	N/A
Framework for Public Service Broadcasting	T1, 2020	N/A	T3, 2021	N/A
ECS Comprehensive Market Surveys	T1, 2020	N/A	T3, 2020	N/A
Review of Wholesale Internet Access	T1, 2019	T1, 2021	T2, 2020	T1, 2021
Review of Interconnection Rates	T2, 2019	T2, 2020	T2, 2020	N/A
ICTs for Disaster Preparedness and Management	N/A	T2, 2020	T1, 2020	T3, 2020
Review of Broadcasting Content Code	N/A	T2, 2020	T1, 2020	N/A

Planned Consultation Results cont'd

	Anticipated Publication Period	Actual (*Revised) Publication Period	Anticipated Completion Period	Actual Closing Period
Establishment of ADR Schemes for the ES	T2, 2019	T2, 2021	T3, 2020	T2, 2021
Framework for the Procurement of Power Generation Resources	T2, 2019	T2, 2020	T2, 2020	N/A
Fuel Charge Cost Recovery Regulation	T2, 2020	N/A	T1, 2021	N/A
Renewable Energy Self Generation Guidelines	T3, 2019	T1, 2020	T1, 2020	N/A
Licensee Data Reporting and Performance Monitoring	T3, 2019	T2, 2020	T2, 2020	N/A

Internal Audit Results

Internal Audit Plan 2020-2021 Results

Report Title	Agreed Start Date	Actual Start Date	Report Date	Summary of Current Findings	Summary of Recommendations
Regulatory	March 9, 2020	April 8, 2020	August 6, 2020	1. There are no internal policies to guide the Electronic Communications and Electricity Sectors, but rather each sector is guided by the respective Acts from the government of The Bahamas. 2. URCA does not have a formal process to guide the monitoring and follow-up of decisions and orders.	1. It is recommended that URCA establish an internal regulatory policy that details procedures for regulatory decision-making and compliance monitoring, including roles and responsibilities and reporting requirements. 2. It is recommended that URCA document and implement a formal process for following-up on previous decisions to ensure that the licensee is complying with the decision.
Complaint Management	May 11, 2020	July 9, 2020	October 5, 2020	1. If a consumer is in direct contact with a regulatory department employee and is unfamiliar with URCA's complaint management process, they will file a complaint directly with the regulatory department. Management advised that complaints received by individuals in other departments may not be communicated to CCR Department for logging. 2. The complaints log outlines all complaints logged for the period. Entries are classified as either a complaint or an inquiry. However, both ae maintained in the same excel sheet.	1. We recommend that management creates and distributes internal complaint management policies that detail how complaints received by other departments should be handled. 2. We recommend that data other than complaints be put in a separate tab or a separate workbook.
Management Action Plan (MAP) Review	May 25, 2020	July 9, 2020	August 24, 2020	1. 30 New Findings between April 2019 – July 2020 2. New Findings by Risk Rating broken to Insight (4), Minor (11), Moderate (7) and Significant (8) 3. Of the 40 Open Findings in 2019: 4 have been completed, 3 have been closed, 9 are in progress, 3 have not been started and the status of 21 are unknown.	N/A

Report Title	Agreed Start Date	Actual Start Date	Report Date	Summary of Current Findings	Summary of Recommendations
Compliance with Key Legislation & Regulations	November 16, 2020	November 16, 2020	February 22, 2021	1. Two issues stemming from previous compliance internal audits: Publishing the Code of Practice for Content Regulation and Establishing a framework for regulating the Electricity Sector. 2. The organizational structure does not include a position with overall responsibility for monitoring URCA's compliance with statutory and regulatory obligations, as well as internal policies/standards.	1. We recommend that the Electricity Sector create a forward-looking workplan/timeline indicating the activities needed to complete the ES regulatory framework that should include tasks, duration, start date, task status and responsible party. 2. We recommend that URCA draft a job description for the Risk/Compliance Officer role and begin the recruitment process to ensure role is filled by planned implementation date.
External Communications	February 1, 2021	February 1, 2021	April 19, 2021	1. URCA's Marketing and Communication plan noted that there are not sufficient staff members to effectively perform external communication responsibilities. 2. URCA does not have a formal process to self-assess the effectiveness of the CCR department's external communications.	1. We recommend that URCA consider investing in resources to assist in the department's duties geared towards media content creation and dissemination. 2. Management should create KPI's for the department. KPI's would allow the CCR department to set actionable goals and measure how successful their externa communications are. They should also implement the intended planned consumer feedback surveys.

Deloitte.