

## Compliance plan for Eastland Distributor – 2021

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11.2(2) and 10.6(2)  From: 01-May-20 To: 30-Sep-21	Corrections not actioned as soon as practicable. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as the BAU processes have been reinstated and corrections are being actioned as soon as practicable. The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Reporting and file checks reinstated for regular review		Nov 21
Preventative actions taken to ensure no further issues will occur		Completion date
As above		As above
		Identified

Provision of information on dispute resolution scheme		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11.30A  From: 01-Feb-21 To: 25-Nov-21	Utilities disputes information not provided as required by the code. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong now as this was addressed during the audit. The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
All known areas of media have been updated to include prominent and clear advice for UDL contact and resolution. Phone messaging is in the process of being restructured to include detail. Letter templates, all correspondence will include UD information.		Nov21
Preventative actions taken to ensure no further issues will occur		Completion date
Above		Above
		Identified

Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 11.7</p> <p>From: 03-Sep-13</p> <p>To: 27-Sep-21</p>	<p>Seven electrically connected ICPs with no initial electrical connection date populated.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate as this is usually captured but there is room for improvement.</p> <p>There were only seven initial electrical connection dates missing. The impact on participants is minor because this field is used to validate other fields against.</p>	
Actions taken to resolve the issue		Completion date
Investigation undertaken - Five items have resolved (some as a result of Registry failed to acknowledge, trader error & historical error) balance to resolve still in progress.		60% complete remainder in progress.
Preventative actions taken to ensure no further issues will occur		Completion date
Access to Audit Compliance reports 1-9 regarding timeliness and 10-16 about potential data accuracy issues are being looked into for access via ENL Registry Manager.		TBC

Timeliness of Provision of ICP Information to the registry manage		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 20-Apr-21</p> <p>To: 06-May-21</p>	<p>Late update to “ready” for three of 290 ICPs electrically connected during the audit period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong, as the processes in place ensure that the information is provided to the registry prior to electricity being traded.</p> <p>The audit risk rating is assessed to be low as only three ICPs were affected, and they were late a maximum of eight business days.</p>	
Actions taken to resolve the issue		Completion date
Trader delay in processing – appears all three are now resolved in system		22/12/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Regular correspondence/direct dialogue to trader has been implemented to identify the issues at the earliest time that report indicates late update to “ready” by trader.		1/12/2021
		Identified

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 01-May-20</p> <p>To: 30-Sep-21</p>	<p>Late population of the initial electrical connection date for some ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong, as they are sufficient to ensure that the timeliness of initial electrical connection dates are at an acceptable level.</p> <p>The audit risk rating is assessed to be low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
<p>Eight anomalies were accounted for during audit session – no further action required.</p> <p>Remainder 2 ICP's a result of contractor paperwork errors – both corrected on follow up as a result of identification from internal report runs.</p>		22/12/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Have recently increased the parameters of the reporting run to encompass a larger period to capture these discrepancies – which enables investigation and resolutions to follow asap.</p>		22/12/2021
		Identified

Monitoring of “new” & “ready” statuses		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 15 of Schedule 11.1 From: 26-Jan-21 To: 15-Nov-21	One ICP not decommissioned set up in error. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as the process in place mitigates risk to an acceptable level. The audit risk rating is actually none but low is the only available option.	
Actions taken to resolve the issue		Completion date
Continue current reporting checks and schedules		Nov21
Preventative actions taken to ensure no further issues will occur		Completion date
Above		Nov21
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 01-May-20 To: 30-Sep-21	Some price, network, status, and address changes were backdated. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as the controls will mitigate risk most of the time.  The audit risk rating is low as the updates have little to no impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Paperwork return remains slow from installers. 'Profile' field changes in the daily Registry files are being monitored and a monthly PR255 report is being run at the end of each month to check for metering changes.		Nov21
Preventative actions taken to ensure no further issues will occur		Completion date
Above		Nov21
		Identified

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 01-May-20</p> <p>To: 30-Sep-21</p>	<p>Four ICPs with duplicate addresses.</p> <p>21 ICPs with a location address which is not readily locatable.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong as controls are robust.</p> <p>The audit risk rating is low there were only a small number of ICPs that were not readily locatable.</p>	
Actions taken to resolve the issue		Completion date
Two ICPs duplicates have been corrected the other two remain under investigation awaiting site visit report from ENL assigned contractor. 21 ICP's not readily locatable are being reviewed and investigated to extents to confirm.		31/3/2022
Preventative actions taken to ensure no further issues will occur		Completion date
ENL will continue with the current control measures in place. Current actions are as best practicable and with best endeavours to the process. Will review possible further actions moving forward.		31/3/2022
		Investigating



Provide ICP Information to the Registry manager		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1)(m) & (p) Schedule 11.1  From: 03-Sep-13 To: 27-Sep-21	One ICP with the incorrect initial electrical connection date. Seven ICPs with missing initial electrical connection dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as they mitigate risk to an acceptable level. The audit risk rating is recorded as low as the overall number of variances is low.	
Actions taken to resolve the issue		Completion date
Reporting and daily file notification checks reinstated.		Nov21
Preventative actions taken to ensure no further issues will occur		Completion date
Above		Nov21