

Compliance Plan 2020

Top Energy Limited

Non-compliance	Description		
<p>Audit Ref: 2.1 With: <i>Clause 11.2(1) and 10.6(1)</i></p> <p>From: 01-Sep-19 To: 31-Aug-20</p>	<p>Registry information missing for a relatively small number of distributed generation ICPs and IECD. Updates to registry late for IECD, pricing, address and network information</p> <p>Potential impact: Low Actual impact: Low Audit history: Three or more times previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. Exception reporting and process has been enhanced since the last audit. It could be expected that this should improve in future.</p> <p>The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We will continue to work on ensuring the registry information is accurate.</p> <p>Initially this will include correcting ICPs identified with missing data in this report and a review of why they occurred.</p>		<p>Ongoing</p> <p>December 2020</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<ul style="list-style-type: none"> - Review of distribution generation processes to improve compliance - Continue monitoring the Audit compliance reports - Inclusion of requirements in specification of new IT system for ICP Management - Ongoing continual improvement of processes and investment of training of new staff 	<p>March 2021</p> <p>Ongoing</p> <p>June 2021</p> <p>Ongoing</p>	
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Non-compliance	Description		
<p>Audit Ref: 3.5 With: <i>Clause 7(2A) of Schedule 11.1</i></p> <p>From: 01-Sep-19 To: 31-Aug-20</p>	<p>10 ICPs out of 457 connected during the audit period had Initial Electrical Connection dates populated in the registry later than 10 days.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three or more times previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. Exception reporting and process has been enhanced since the last audit. It could be expected that this should improve in future.</p> <p>The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Periodic reviews of the EA Audit compliance reports were implemented in conjunction with training of staff as per last year's actions.</p> <p>This resulted in improved performance over the period with only one occurrence since 6 January 2020 and none in last 6 months of the audit period</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 3.14 With: <i>Clause 15</i> <i>Schedule 11.1</i></p> <p>From: 01-Sep-19 To: 31-Aug-20</p>	<p>3 ICPs have remained in the new status for more than 24 months.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three or more times previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. Exception reporting and process has been enhanced since the last audit. It could be expected that this should improve in future.</p> <p>The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A new process has been implemented to periodically contact retailers to request whether an ICP that has been on New or Ready status for more than 24 months should continue on that status or change to decommissioned under 15 (2) of Schedule 11.1 of The Code.</p> <p>This process resulted in Top Energy</p> <ul style="list-style-type: none"> a) asking the trader who intends to trade at the ICP whether the ICP should continue to have that status; and b) decommission the ICP if the trader advises that the ICP should not to continue to have that status. <p>All ICPs with Traders were sent to retailers. The 3 ICPs remain in new status for more than 24 months have no Trader and are being investigated</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Follow new process		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.1 With: <i>Clause 8</i> <i>Schedule 11.1</i></p> <p>From: 01-Sep-19 To: 31-Aug-20</p>	<p>Registry information not updated within 3 business days from the event date for a low percentage of transactions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three or more times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. Exception reporting and process has been enhanced since the last audit. It could be expected that this should improve in future.</p> <p>The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Our objective remains that of achieving an accurate Registry</p> <p>Changed our internal process to ensure updates meet the required timeframe e.g. business dates. This includes ensuring that updates are completed and uploaded onto the registry by day 3.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our aim for compliance however where ensuring the registry is accurate causes non-compliance, we believe this is acceptable. We do however wish to minimise this as much as possible. To ensure this we will:</p> <ul style="list-style-type: none"> Review of EA Audit report to monitor compliance and ensure processes are working. Require internal signoff of changes greater than 3 business days 		<p>Ongoing</p> <p>Onoging</p>	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: <i>Clause 7(1)</i> <i>Schedule 11.1</i></p> <p>From: 01-Sep-19</p> <p>To: 31-Aug-20</p>	<p>The registry contains incorrect information for a number of ICPs with respect to Initial Electrical Connection Date, solar installations and unmetered load.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three or more times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. Exception reporting and process has been enhanced since the last audit. It could be expected that this should improve in future.</p> <p>The audit Risk Rating is assigned as low due to due to a small number of ICPs and minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This is very similar to the issues identified in 2.1 as it is the same information and as such are penalised twice.</p> <p>Same as section 2.1</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as section 2.1			