

## Compliance Plan for Northcote RD 1 Holdings Limited (SMAL) - 2020

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) and 10.6(1)  From: 01-Apr-19 To: 01-May-19	Inaccurate loss factors for a period of one month.  Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as the process for review of loss factors does not always ensure that updates are timely. The impact is low because of the low number of ICPs affected.	
Actions taken to resolve the issue		Completion date
We do not agree with non-compliance here – the pricing and loss factor updates for SMAL are updated from 1 May each year in line with the updates made from 1 April each year by Vector, due to the timing of the notice from Vector and other local networks there is not sufficient time to process their changes to align with 1 April and maintain compliance by providing the required 2 month notice period to Registry of the loss factor change. This is a long-standing process that has never been found non-compliant in the past.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
As above – we do not concur that non-compliance existing here so therefore no further actions required.		N/A
		Disputed

Timeliness of Provision of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1</p> <p>From: 27-Nov-18 To: 05-Jun-20</p>	<p>One new connection did not have an initial electrical connection date populated within 10 business days of electrical connection.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as moderate as they are sufficient to ensure that initial electrical connection dates are updated on time most of the time.</p> <p>The impact is low because of the low number of late updates.</p>	
Actions taken to resolve the issue		Completion date
The late update was checked, to determine the reason for the late updates. The late update was due to a late metering event by the MEP 27/11/2018. TENCO update was on the 28/11/2018. Tenco had historically populated IED's once the retailer and MEP had populated details to registry to ensure that the Active date and meter cert date were in synch and therefore to maintain compliance.		19/6/2020
Preventative actions taken to ensure no further issues will occur		Completion date
As opposed to wait for MEP details to populate to Registry we will instead input the IED where it is known based off retailer update to Registry only and therefore so long as they are populating within the required timeframes then SMAL will also remain compliant		18/09/2019

Maintenance of price category codes		
Non-compliance	Description	
Audit Ref: 4.12 With: Clause 23 Schedule 11.1  From: 22-Nov-19 To: 09-Jun-20	Three price category codes updated on the registry less than two months prior to the start dates. 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>	Controls are rated as strong as this case was an exception and appropriate notice of price category codes is provided most of the time. The impact is low because of the low number of ICPs affected.	
Actions taken to resolve the issue		Completion date
This is a one off occurrence and a result of a billing system upgrade, late in the migration and setup of the new billing system for 1 December it was found that the use of a single pricing code on 3 ICP's where ICP specific pricing was being applied could not be maintained in the new system to allow billing to process.		22/11/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Routine and robust controls are in effect.		22/11/2019

Creation of loss factors		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 11.2  From: 01-Apr-19 To: 01-May-19	Inaccurate loss factors for a period of one month. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate as the process for review of loss factors does not always ensure that updates are timely. The impact is low because of the low number of ICPs affected.	
Actions taken to resolve the issue		Completion date
We do not agree with non-compliance here – the pricing and loss factor updates for SMAL are updated from 1 May each year in line with the updates made from 1 April each year by Vector, due to the timing of the notice from Vector and other local networks there is not sufficient time to process their changes to align with 1 April and maintain compliance by providing the required 2 month notice period to Registry of the loss factor change. This is a long-standing process that has never been found non-compliant in the past.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
As above – we do not concur that non-compliance existing here so therefore no further actions required.		N/A
		Disputed