

## Compliance plan for CBRE Networks Ltd (CBRE)

Title: Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Dec-18</p> <p>To: 03-Dec-18</p>	<p>27 ICPs did not have a proposed trader recorded prior to initial electrical connection.</p> <p>28 ICPs did not have "ready" status recorded prior to initial electrical connection.</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>This is a technical non-compliance only, which occurred because the embedded network start date fell on a weekend. The code does not allow an extension to the deadline for recording a proposed trader and status update under these circumstances.</p> <p>The impact is low, because the proposed trader and ready status were recorded within one business day of initial electrical connection.</p>	
Actions taken to resolve the issue		Completion date
As noted, this is a technical non-compliance as we had engaged with the retailers and each network and moved the ICP's to Ready first thing on the next business day following the start date for the Embedded Network – as we are not a 7 day a week business, we could not avoid this non-compliance in this case.		03/12/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Were we have a network starting on a weekend day we will look to request our registry staff to update Registry on the weekend as opposed to waiting until the first business day following.		On Going
		Identified

Title: Timeliness of Provision of Initial Electrical Connection Date			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2) of Schedule 11.1  From: 01-Dec-18 To: 21-Jan-19	14 ICPs did not have initial electrical connection dates populated within ten business days of initial electrical connection.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as strong. Exceptional circumstances prevented the initial electrical connection dates from being updated on time, and controls are in place to identify missing and update missing initial electrical connection dates.  The impact is low, because there is no direct impact on settlement and the initial electrical connection dates were recorded within 30 business days of initial electrical connection.		
Actions taken to resolve the issue		Completion date	Remedial action status
The IED was input when the ICP's were set to Active in Registry by the retailer – we had to chase them for this as had sent them connection details in the lead up to the network go live.		Jan-19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We managed the network go live and worked with the retailer on the claiming of the ICP's – we should have input on the IED on the 3 <sup>rd</sup> of December when we knew that the ICP's were live and will do so going forward.		August-19	

Title: Connection of ICP that is not an NSP	
Non-compliance	Description
Audit Ref: 3.6 With: Clause 11.17  From: 01-Dec-18 To: 03-Dec-18	27 ICPs did not have a proposed trader recorded prior to initial electrical connection.  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>	<p>This is a technical non-compliance only, which occurred because the embedded network start date fell on a weekend. The code does not allow an extension to the deadline for recording a proposed trader under these circumstances.</p> <p>The impact is low, because the proposed trader and ready status were recorded within one business day of initial electrical connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted, this is a technical non-compliance as we had engaged with the retailers and each network and moved the ICP's to Ready and populated proposed retailer, NSP and pricing first thing on the next business day following the start date for the Embedded Network – as we are not a 7 day a week business, we could not avoid this non-compliance in this case.		03/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will change our process to update the proposed retailer at new status in the future as opposed to loading at the time of network go live.		On going	

Title: Connection of NSP that is not point of connection to grid	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 10.30</p> <p>From: 01-May-18</p> <p>To: 03-Oct-18</p>	<p>MEP and meter certification not provided to the RM within 5 business days of electrical connection for CGE0011, CSC0011, and CSC0012.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>The controls are rated as moderate, because there is some room for improvement.</p> <p>The impact is low, because there is no direct impact on settlement.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The MEP details were updated late here for CGE0011 this was an oversight on our end as ended up understaff following the unexpected leaving of 1 team member, for CSC0011 and CSC0012 the metering paperwork came to us late which resulted in us in turn being late to update the NSP metering table on the RM portal.	Jun/July-18 & Jan-19	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We have increased our resource and are putting better controls on these key steps in the setup of new Embedded Networks to ensure that the updates meet the requirements of Code.	2019	

<b>Title: Changes to registry information</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 19-Mar-18</p> <p>To: 08-Oct-18</p>	<p>Seven late updates to decommissioned status.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time.</p> <p>The late decommissioned status updates were found to be delayed by late trader updates to ready for decommissioning status, and processed within two business days of the trader's update.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
As noted above by our auditor the registry updates required by a distributor were completed within 1 business day of the trader making the change in registry so we therefore could not have completed this change any earlier than we have.	N/A	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
None as systems are in place but a reliant on other industry participants to meet their obligations to allow us to be compliant.	N/A	

Title: Responsibility for metering information when creating an NSP that is not a POC to the grid			
Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: Clause 10.25(2)</p> <p>From: 01-Dec-18</p> <p>To: 03-Dec-18</p>	<p>MEP and meter certification not provided to the RM within 20 business days of meter certification for CGE0011 and CSC0011.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as moderate, because there is some room for improvement.</p> <p>The impact is low, because there is no direct impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The MEP details were updated late here for CGE0011 this was an oversight on our end as ended up understaff following the unexpected leaving of 1 team member, for CSC0011 the metering paperwork came to us late which resulted in us in turn being late to update the NSP metering table on the RM portal.		Jun/July-18 & Jan-19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have increased our resource and are putting better controls on these key steps in the setup of new Embedded Networks to ensure that the updates meet the requirements of Code.		2019	