

COMPLIANCE PLAN FOR MARLBOROUGH LINES - 2019

Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: 11.2(2) of Part 11</p> <p>From: 01-Sep-17</p> <p>To: 14-Feb-19</p>	<p>Missing data is corrected but in a few cases is identified late, it results in backdating transactions in the registry.</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		
Low	<p>We assessed the controls as strong. The company closely monitors information in the registry. Audit risk rating is assessed as low because Marlborough Lines proactively pursues data correction. No impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL runs a weekly Registry comparison report with equivalent records in Gentrack. Where discrepancies are identified, MLL will fix where appropriate.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(2A) of Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 14-Feb-19</p>	<p>9 ICPs (1.9%) electrically connected since the last audit had the Initial Electrical Connection Date populated later than 10 business days</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>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as strong. A report run daily allows the tight control of information received. The biggest problem is the external contractors, who are slow in providing paperwork. There is no impact on participants, therefore, audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>MLL continues to run the daily report to compare differences in connections from the previous day. This allows MLL to see which ICPS have been connected overnight and where we may need to follow up to obtain the relevant paperwork. MLL adds comments to the Gentrack connection that the report has picked up that the connection has been connected and that no paperwork has been provided.</p> <p>MLL periodically requests that external contractors submit new electrical connections paperwork in a timely manner.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 14-Feb-19</p>	<p>Late pricing updates for a small percentage of ICPs (4.2%) and network updates (27.6%)</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	We have recorded the controls as moderate because they needs additional refinement. There is no impact on participants, therefore, audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Network – MLL will continue to routinely check the metering installation information and follow up with customers where appropriate to confirm solar installations.</p> <p>Pricing – MLL has requested Gentrack to resolve the issue where new price plans are being incorrectly created. This is currently under action. MLL will endeavour to update the registry with the correct information on time in future, noting that retailers are separately notified by MLL directly of any changes to RPD values.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 14-Feb-19</p>	<p>Ten ICPs had duplicate addresses that did not allow them to be readily located</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		
Low	We have recorded the controls as strong. The process used by the company is working well. Very small number of ICPs effected. There is no impact on participants, therefore, audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL, when creating new ICPs, checks that there are no existing ICPs with the same address. MLL will add GPS coordinates where there are address clashes to uniquely identify the location of the ICP. MLL will aim to have this in place by 1 July 2019.		01/07/19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 14-Feb-19</p>	<p>A very small number of ICPs had information missing in the registry</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		
Low	<p>We have recorded the controls as strong. The monitoring process implemented by the company is working well. The level of compliance is better than during the last audit. There is no impact on participants, therefore, audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>MLL will review the NMR (metering) report (from the Registry) which highlights connections where DG has been installed. MLL compares this report to corresponding information in Gentrack and where there are discrepancies will update.</p> <p>MLL continues to lobby Gentrack to improve its functionality so that issues such as this one (the IED disappearing when DG information is added to certain ICP records) are resolved.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
		Ongoing	

Non-compliance	Description		
Audit Ref: 5.2 With: 22(5) of Schedule 11.1 From: 01-Feb-18 To: 05-Feb-18	Late update of two loss factor codes Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made to them. Two loss factors were updated late by 5 days before they took effect. There is no impact on settlement outcomes. Audit risk rating rated as low		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL will ensure that the next time loss factors are revised, they will be advised to retailers in accordance with the required timeframe.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	