

Compliance plan for Scentre Shopping Centre Management Ltd

| Title: Changes to registry information | | |
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| Non-compliance | Description | |
| Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 15-Jan-18 To: 18-Dec-18 | 63 late updates to decommissioned status. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. The late decommissioned status updates were found to be delayed by late trader updates to ready for decommissioning status, and processed within four business days of the trader's update. | |
| Actions taken to resolve the issue | | Completion date |
| No action is required as lateness can't be resolved. | | 04/06/2019 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| TENCO is reliant on other industry participants to complete their updates on time. Energy Retailers have backdated their updates further than 3 business days therefore Tenco could not complete our updates on time – as noted once we see a change of status we are generally updating within 2 business days. | | 04/06/2019 |
| | | Identified |

| Title: Distributors to Provide ICP Information to the Registry manager | | | |
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| Non-compliance | Description | | |
| <p>Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1</p> <p>From: 15-Apr-19 To: 15-Apr-19</p> | <p>Two ICPs had an incorrect dedicated NSP value recorded, and were corrected during the audit.</p> <p>One ICP had an incorrect loss factor value recorded.</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 | | |
| Low | <p>The controls are assessed to be moderate because there are procedures in place to ensure that information is accurate, but these exceptions were not identified until the audit.</p> <p>The impact is assessed to be low due to the small number of discrepancies identified and the low impact of the errors.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The dedicated NSP flag for 2 ICP's was updated and the loss code for the ICP noted has also now been updated | | 31/05/2019 & 01/06/2019 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Controls on the issuing of pricing and loss codes are strong and the incorrect loss code on ICP 0005020391WFF87 looks to have been an historical issue from when the ICP was created back in 2012 when Registry Services were outsourced to another provider prior to Tenco bringing these in house. The issue with dedicated NSP flag being used to allow a registry change due to network event dates was human error as the flag should have been changed back post the registry update being input, we will add to our compliance dashboard a dedicated NSP flag check for all ICP's that we manage. | | 30/06/2019 | |

| Title: Responsibility for metering information for NSP that is not a POC to the grid | | |
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| Non-compliance | Description | |
| <p>Audit Ref: 6.8</p> <p>With: Clause 10.25(1) and 10.25(3)</p> <p>From: 12-Apr-18</p> <p>To: 03-Jun-19</p> | <p>WTS0011 has expired meter certification.</p> <p>The Reconciliation Manager was notified 36 days after recertification for WSL0111.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are currently rated as moderate, because there are processes in place to check and update meter certification details.</p> <p>The audit risk rating is low, because a small number of meters are affected.</p> | |
| Actions taken to resolve the issue | | Completion date |
| For WTS0011 the metering expiry date on the RM NSP metering table has been updated – at no point was a non-compliant meter servicing the NSP and it was updated within the 20 BD timeframe. For WSL0111 there was not notice received from AMCI as had previously been agreed which resulted in late notice – we have followed up with AMCI on this and they have reminded their team of this requirement (it is a manual task for them to advise us) | | 04/06/2019 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Process is already in place to ensure compliance in this area – we are working with AMCI to ensure timely advice of meter recerts to allow us to meet the 20BD rule as we do not control when a meter is recertified and therefore can only monitor impending expiry dates and chase AMCI off these if advice is not provided to us. We have also recently written to the EA suggest a Code change that would require LE ICP metering data to be held in Registry which would allow for both us and MEP's to manage the compliance records in the same way that all GN and EN metering certification can be managed. | | N/A |
| | | Identified |