

## Compliance plan for Counties Power

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1)  From: 16-Aug-16 To: 15-Sep-17	Some information in the registry still must be corrected or populated 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>	We recorded controls as moderate. Counties Power tries to have complete and accurate data but there is still room for improvement; no impact settlement outcomes therefore audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Counties Power has appointed a Customer Connections Co-ordinator and has created the role of Customer Connections Manager with responsibility for compliance with registry requirement. Development of reports to identify transactions that are delayed or non-compliant is continuing as is development of procedures to ensure compliance		30/6/18	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Some reports now available to monitor compliance		30/6/18	

Non-compliance	Description		
Audit Ref: 2.2 With:  From: 16-Aug-16 To: 15-Sep-17	Incorrect data is corrected but in some cases, it is identified late and results in backdating transactions in the registry. 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>	We recorded controls as moderate, Audit risk rating is assessed as low because Counties Power pursue data correction but it is not a structure process. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Counties Power has appointed a Customer Connections Co-ordinator and has created the role of Customer Connections Manager with responsibility for compliance with registry requirement. Development of reports to identify transactions that are delayed or non-compliant is continuing as is development of procedures to ensure compliance		30/6/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Some reports now available to monitor compliance		30/6/18	

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	27 ICPs (2.8%) electrically connected since the last audit had Initial Electrical Connection Date populated later than 10 business days  Potential impact: Low Actual impact: Low  Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	We recorded the controls as moderate. Only 2.7% of new installations were effected by this non-compliance. The current process is good but requires additional enhancements.		
Actions taken to resolve the issue		Completion date	Remedial action status
CP has commissioned reporting to identify any delays in updating the registry before non-compliance.  Organisation structure change to provide ownership of ICP creation and related code compliance		30/6/18	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

CP has commissioned reporting to identify any delays in updating the registry before non-compliance.  Organisation structure change to provide ownership of ICP creation and related code compliance	30/6/18	
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Non-compliance	Description		
Audit Ref: 4.1 With: 8 of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	Some updates to network, pricing information and the “decommissioning” status in the registry for were done later than 3BD.  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate. Some update like pricing are done as per traders’ requests, it could disadvantage a customer if the company allows only go back by 3 BD. No impact on settlement outcomes therefore audit risk rating assigned as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Develop process changes to ensure more timely response to retailer requests.  CP has commissioned the development of reporting to identify non-compliance.		31/12/17	Choose an item.
Preventative actions taken to ensure no further issues will occur		Completion date	
Develop process changes to ensure more timely response to retailer requests.  CP has commissioned reporting to identify non-compliance.		31/12/17	

Non-compliance	Description
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Audit Ref: 4.4 With: 2 of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	2,041 ICPs have duplicate addresses, a location address does not allow ICPs to be readily located Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	We have recorded the controls as moderate. Navision has a built-in business rule not allowing duplicate addresses but there is no follow up to check if information from Navision is correctly uploaded to the registry; no impact on settlement outcomes therefore audit risk rating is recorded as low	
Actions taken to resolve the issue	Completion date	Remedial action status
Review compliance requirements for addresses and modify data entry processes to ensure compliance. Update non-compliant addresses	31/3/18	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Review compliance requirements for addresses and modify data entry processes to ensure compliance. Update non-compliant addresses	31/3/18	

<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 4.6</p> <p>With: 7 (1) of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 15-Sep-17</p>	<p>Incorrect or missing information in the registry for UML, Initial Electrical Connection Date, NSPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	The controls are recorded as weak, the same problems as identified in previous audits, no structured process to validate data. Audit risk rating is recorded as low, because of the small number of ICPs effected. NSPs incorrect allocations need to be further investigated.

Actions taken to resolve the issue	Completion date	Remedial action status
Monitoring reports have been commissioned to identify non-compliance. Organisation structure change to provide ownership of ICP creation and related code compliance	31/3/18	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monitoring reports have been commissioned to identify non-compliance. Organisation structure change to provide ownership of ICP creation and related code compliance	31/3/18	

Non-compliance	Description		
Audit Ref: 4.9 With: 14 of Schedule 11.1  From: 16-Aug-16 To: 15-Sep-17	Top Energy receives confirmation from a trader accepting responsibility for the ICP after the registry changes the ICP status to “ready” because a proposed trader specified by a customer was uploaded  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We have recorded the controls as moderate. Counties Power has a good process in place to receive confirmation from a trader accepting responsibility for the ICP but it is received after an ICP has the status changed to “ready” in the registry. Audit risk rating low, no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Counties Power will raise this issue with the EA as we believe the setting of the status to “Ready” is a Registry function. CP enter the proposed retailer only.		30/6/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Counties Power will raise this issue with the EA as we believe the setting of the status to “Ready” is a Registry function. CP enter the proposed retailer only.		30/6/18	

Non-compliance	Description		
Audit Ref: 4.12 With: 23 of Schedule 11.1  From: 01-Feb-17 To: 01-Apr-17	Three new price category codes were not uploaded 2 months earlier than the date the code takes effect (only three days in advance) Potential impact: Low Actual impact: Low Audit history: Once before Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	We identified controls as weak. The same non-compliance was identified a few years ago. There is no documented process in place but at least the company remembers to do it. There was no impact on customers and settlement income therefore audit risk rating is identified as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Procedures for price structure changes will be documented		31/12/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Procedures for price structure changes will be documented		31/12/17	