

## 2017 Compliance plan for Smartnet Limited

| Timeliness of Provision of ICP Information to the registry                        |                                                                                                                                                                                                                                                     |                 |
|-----------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                                    | Description                                                                                                                                                                                                                                         |                 |
| Audit Ref: 3.4<br>With: 7(2) of Schedule 11.1<br>From: 12-Aug-16<br>To: 10-Sep-16 | 4 ICPs created after electricity has commenced trading.<br>Potential impact: None<br>Actual impact: None<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                                                                      |                 |
| Audit risk rating                                                                 | Rationale for audit risk rating                                                                                                                                                                                                                     |                 |
| Low                                                                               | The controls are rated as moderate as the process is largely manual hence errors can occur but controls are in place to mitigate risk most of the time.<br>The audit risk rating is low as only 4 ICPs were not updated prior to trading occurring. |                 |
| Actions taken to resolve the issue                                                |                                                                                                                                                                                                                                                     | Completion date |
| Corrected upon discovery                                                          |                                                                                                                                                                                                                                                     | Sept 2016       |
| Preventative actions taken to ensure no further issues will occur                 |                                                                                                                                                                                                                                                     | Completion date |
| Ensure correct date is used when creating ICP's                                   |                                                                                                                                                                                                                                                     | Ongoing         |
|                                                                                   |                                                                                                                                                                                                                                                     | Identified      |

| Timeliness of Provision of Initial Energisation Date                                   |                                                                                                                                                                             |                 |
|----------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                                         | Description                                                                                                                                                                 |                 |
| Audit Ref: 3.5<br>With: 7(2A) of Schedule 11.1<br><br>From: 01-Oct-16<br>To: 07-Feb-17 | 6 ICPs Initial energisation dates updated late.<br>Potential impact: None<br>Actual impact: None<br>Audit history: Twice<br>Controls: Moderate<br>Breach risk rating: 2     |                 |
| Audit risk rating                                                                      | Rationale for audit risk rating                                                                                                                                             |                 |
| Low                                                                                    | The controls are rated as moderate - additional checks have been added since these occurred.<br>This has no direct impact on submission hence the audit risk rating is low. |                 |
| Actions taken to resolve the issue                                                     |                                                                                                                                                                             | Completion date |
| Date populated as soon as provided                                                     |                                                                                                                                                                             |                 |
| Preventative actions taken to ensure no further issues will occur                      |                                                                                                                                                                             | Completion date |
| Contractor has additional checks to ensure correct energization date.                  |                                                                                                                                                                             | Mar 2017        |
|                                                                                        |                                                                                                                                                                             | Identified      |

| Connection of ICPs                                                    |                                                                                                                                                                                                                                                                                       |                 |
|-----------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                        | Description                                                                                                                                                                                                                                                                           |                 |
| Audit Ref: 3.6<br>With: 11.17<br><br>From: 12-Aug-16<br>To: 10-Sep-16 | 4 ICPs electrically connected prior to having a “trader” nominated on the registry.<br>Potential impact: None<br>Actual impact: None<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                                                                            |                 |
| Audit risk rating                                                     | Rationale for audit risk rating                                                                                                                                                                                                                                                       |                 |
| Low                                                                   | The controls are rated as moderate as the process is largely manual hence errors can occur but controls are in place mitigate risk most of the time.<br>The audit risk rating is low as only 4 ICPs were electrically connected prior to having a “trader” nominated on the registry. |                 |
| Actions taken to resolve the issue                                    |                                                                                                                                                                                                                                                                                       | Completion date |
| Corrected upon discovery                                              |                                                                                                                                                                                                                                                                                       | Sept 2016       |
| Preventative actions taken to ensure no further issues will occur     |                                                                                                                                                                                                                                                                                       | Completion date |
| Ensure correct date is used when creating ICP's                       |                                                                                                                                                                                                                                                                                       | Ongoing         |

| Electrical connection of ICPs                                            |                                                                                                                                                                                                                                                                                         |                 |
|--------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                           | Description                                                                                                                                                                                                                                                                             |                 |
| Audit Ref: 3.7<br>With: 10.28(7)<br><br>From: 12-Aug-16<br>To: 10-Sep-16 | 4 ICPs electrically connected prior to retailer accepting responsibility and therefore before the request to electrically connect has been given.<br><br>Potential impact: None<br><br>Actual impact: None<br><br>Audit history:<br><br>Controls: Moderate<br><br>Breach risk rating: 2 |                 |
| Audit risk rating                                                        | Rationale for audit risk rating                                                                                                                                                                                                                                                         |                 |
| Low                                                                      | The controls are rated as moderate as the process is largely manual hence errors can occur, but controls are in place mitigate risk most of the time.<br><br>The audit risk rating is low as only 4 ICPs were electrically connected prior to retailer accepting responsibility.        |                 |
| Actions taken to resolve the issue                                       |                                                                                                                                                                                                                                                                                         | Completion date |
| Corrected upon discovery                                                 |                                                                                                                                                                                                                                                                                         | Sept 2016       |
| Preventative actions taken to ensure no further issues will occur        |                                                                                                                                                                                                                                                                                         | Completion date |
| Ensure correct date is used when creating ICP's                          |                                                                                                                                                                                                                                                                                         | Ongoing         |

| Electrical connection of ICP that is not an NSP                                      |                                                                                                                                                                                                                                                                                                     |                 |
|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                                       | Description                                                                                                                                                                                                                                                                                         |                 |
| <p>Audit Ref: 3.8</p> <p>With: 10.31</p> <p>From: 12-Aug-16</p> <p>To: 10-Sep-16</p> | <p>4 ICPs electrically connected prior to retailer accepting responsibility and therefore before the request to electrically connect has been given.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 rated as moderate as the process is largely manual hence errors can occur, but controls are in place mitigate risk most of the time.</p> <p>The audit risk rating is low as only 4 ICPs were electrically connected prior to retailer accepting responsibility.</p>             |                 |
| Actions taken to resolve the issue                                                   |                                                                                                                                                                                                                                                                                                     | Completion date |
| Corrected upon discovery                                                             |                                                                                                                                                                                                                                                                                                     | Sept 2016       |
| Preventative actions taken to ensure no further issues will occur                    |                                                                                                                                                                                                                                                                                                     | Completion date |
| Ensure correct date is used when creating ICP's                                      |                                                                                                                                                                                                                                                                                                     | Ongoing         |

| Electrical connection of NSP that is not a point of connection to the grid   |                                                                                                                                                                                                                                                           |                 |
|------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                               | Description                                                                                                                                                                                                                                               |                 |
| Audit Ref: 3.9<br>With: 10.30(2)<br><br>From: 10-Oct-16<br>To: 30-Jun-17     | MEP and meter certification not provided to the RM within 5 business days of electrical connection for 2 NSPs.<br><br>Potential impact: None<br><br>Actual impact: None<br><br>Audit history: None<br><br>Controls: Moderate<br><br>Breach risk rating: 2 |                 |
| Audit risk rating                                                            | Rationale for audit risk rating                                                                                                                                                                                                                           |                 |
| Low                                                                          | The controls are rated as moderate as TEG is reliant on the MEP to provide this information and this is sometimes slow.<br><br>The audit risk rating is low as this has no direct impact on reconciliation.                                               |                 |
| Actions taken to resolve the issue                                           |                                                                                                                                                                                                                                                           | Completion date |
| Reliant on MEP to provide timely notification of metering information        |                                                                                                                                                                                                                                                           |                 |
| Preventative actions taken to ensure no further issues will occur            |                                                                                                                                                                                                                                                           | Completion date |
| Follow up MEP more closely for timely Metering information on Gate metering. |                                                                                                                                                                                                                                                           | Ongoing         |
|                                                                              |                                                                                                                                                                                                                                                           | Identified      |

| Changes to registry information                                                 |                                                                                                                                                                                                                                |                 |
|---------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|
| Non-compliance                                                                  | Description                                                                                                                                                                                                                    |                 |
| Audit Ref: 4.1<br>With: 8 Schedule 11.1<br><br>From: 01-Oct-16<br>To: 10-Apr-17 | 21 late updates to the registry.<br>Potential impact: None<br>Actual impact: None<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2                                                                        |                 |
| Audit risk rating                                                               | Rationale for audit risk rating                                                                                                                                                                                                |                 |
| Low                                                                             | The controls are rated as moderate as the process is largely manual hence errors can occur, but controls are in place to mitigate risk most of the time.<br>The audit risk rating is low the late changes are small in volume. |                 |
| Actions taken to resolve the issue                                              |                                                                                                                                                                                                                                | Completion date |
| Closer monitoring of information updates                                        |                                                                                                                                                                                                                                | Nov 16          |
| Preventative actions taken to ensure no further issues will occur               |                                                                                                                                                                                                                                | Completion date |
| Closer monitoring of updates                                                    |                                                                                                                                                                                                                                | Ongoing         |
|                                                                                 |                                                                                                                                                                                                                                | Identified      |