

## Compliance plan for Accucal – 2018

Registry Notification of Metering Records			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4  From: 31-Aug-18 To: 02-Sep-18	Late registry update for one ICP. 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>	The controls are recorded as strong because they mitigate risk when possible. The only late update was due to late nomination.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
No comment here as the late nomination was out of our hands.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
N/A		N/A	

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4  From: 01-Jun-17 To: 26-Nov-18	Four records updated on the registry later than 10 business days. 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>	I have recorded the controls as strong in this area because Accucal has checks in place to identify and resolve discrepancies and the number of late updates was low.  The impact on participants, customers or settlement could be minor where a tariff change may be required; therefore, the audit risk rating is low.		

Actions taken to resolve the issue	Completion date	Remedial action status
In nearly all cases the late updates were due to the MEP manager being on leave. The updates were completed as soon as possible.	As per records	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Internal training underway to ensure cover for this.	April 2019	

MEP Response to Switch Notification			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 1(1) of Schedule 11.4  From: 15-Oct-18 To: 17-Oct-18	One late acceptance. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue	Completion date	Remedial action status	
This was a mis-understanding where acceptance was not completed until the metering was commissioned and updated.	Oct 2018	Cleared	
Preventative actions taken to ensure no further issues will occur	Completion date		
Acceptance will be actioned regardless of metering installation stage.	Nov 2018		

Provision of Registry Information			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 18-Jul-16 To: 26-Nov-18	One incorrect certification date. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	I have recorded the controls as strong in this area because there was only one error. The impact on participants is minor; therefore the audit risk rating is low..		
Actions taken to resolve the issue		Completion date	Remedial action status
Records not updated when installation was re-certified due to generator removal and re-installation. Not updated as expiry date didn't change, hence no impact to any party, except for inspection window.		27/11/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
As per flagging system in certification registers, these changes are now flagged to the MEP manager.		Implemented at last audit	

Correction of Errors in Registry	
Non-compliance	Description
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Jun-17 To: 26-Nov-18	Registry validation not conducted for every month of the audit period. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	The controls are recorded as weak because they will not mitigate risk most of the time. The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
An automated process is being developed and is hoped to be fully automated on a monthly basis. Some manual input is however likely to still be required.	By June 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional staff are to be employed for administrative roles and these staff will be trained in registry matters, therefore ensuring processes are followed in timely fashion.	By June 2019	