

## COMPLIANCE PLAN FOR ELECTRICA

Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: 15.35</p> <p>From: 17-Jun-17</p> <p>To: 08-Jan-18</p>	<p>Reconciliation files were late for consumption period of June'17. The files were delivered by the end of day 4.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as strong because it happens only once, and it was caused by number of unforeseen circumstances. There was no impact on settlement. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The Electricity Authority decided to take no further action on the breach under regulation 11(1)(c) of the Electricity Industry (Enforcement) Regulation 2010 (Regulations).			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We have created a backup environment, so that if our main environment (production server) is not available we can still run our reconciliation process. This will allow us to send the reconciliation files in time.		31 July 2017	

Non-compliance	Description		
Audit Ref: 2.8 With: 11.15B  From: 17-Jun-17 To: 08-Jan-18	The wording on the Terms & Conditions was not compliant with clause 11.15B  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak because the issue has been known to the company, but implementation of the Authority's recommendation is slow. There was no impact on settlement. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have already updated all the clauses where EA has found our terms and conditions to have "non-existent" or "low" compliance and we are working to update the rest. We aim to have our Terms and Conditions fully compliant by the end of March 2018.		End of March 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 26-Sep-16</p> <p>To: 20-Oct-17</p>	<p>Two updates (trader's transaction) to the registry were backdated</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: once before</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only two ICPs. Change of profile was included in revision files. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This was not an intentional backdate but rather a data input error. We fixed the error as soon as we found about it. The error and the corrections resulted in backdating events.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have put the following note in our registry maintenance documentation "When creating a new event, the event date defaults to the date of the previous event. This date must be changed to the desired date of the new event."		31 May 2017	