

## Compliance plan for Ecosmart

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1  From: 22-Aug-17 To: 31-May-18	Seven updates to the registry were later than five 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>	Controls are recorded as moderate because there are some improvements that can be made to them. Ecosmart is a trader with a small number of ICPs. There are not many activities happens in the registry, which requires even more vigilance to meet compliance with this clause. The audit risk rating is low because there is no impact on the settlement outcome.		
Actions taken to resolve the issue		Completion date	Remedial action status
Backdated changes to reflect data availability, while non-compliant we believe that accuracy is more important than timeliness.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
If practical we will not be backdating records			

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 6(1) of Schedule 11.3</p> <p>From: 18-Jul-17</p> <p>To: 01-Aug-18</p>	<p>Switch event read was not used for two ICPs</p> <p>Potential impact: None</p> <p>Actual impact: Low</p> <p>Audit history: once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. In the case of two ICPs no switch event read was used because RR file for one ICP was not accepted by a gaining trader. Ecosmart is aware of their non-compliance but a solution which they would like to adopt put them into a non-compliant situation because original data will be overwritten. Ecosmart is a very small trader therefore the impact on settlement outcomes is minimal</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The instruction to reprofile data if agreement on an RR is not reached was issued after the events identified, so we were working on the previous instruction that no valid HHR data was to be replaced.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Now we have had updated guidance from the EA we will reprofile submission data (leaving billing data untouched), especially as the effects are usually minor			

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: 12 of Schedule 11.3</p> <p>From: 25-Dec-17</p> <p>To: 25-Dec-17</p>	<p>Switch event read was not used for one ICP. A switch event read was too high by 12 kWh</p> <p>Potential impact: None</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		
Low	<p>Controls are recorded as strong. There is a good process in place. For one ICP a switch event read was not used because it was too high by 12 kWh. The impact on settlement outcomes was minor. Audit risk rating recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The instruction to reprofile data if agreement on an RR is not reached was issued after the events identified, so we were working on the previous instruction that no valid HHR data was to be replaced.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Now we have had updated guidance from the EA we will reprofile submission data (leaving billing data untouched), especially as the effects are usually minor (12kwh = ~\$1.00)			

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7  From: 01-Jul-17 To: 30-Aug-18	Energy supplied is currently calculated by Jc Consulting from the previous months Initial Network volumes.  Potential impact: None  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because data is not coming from a billing system because it is still under development, however volumes submitted to networks are very accurate based on meter readings. There is no impact on settlement outcomes. Audit risk low.		
Actions taken to resolve the issue		Completion date	Remedial action status
ECOS Is building functionality to report energy supplied volumes correctly			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8  From: 01-Jul-17 To: 30-Jun-18	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Ecosmart submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
Double Jeopardy - remedy is in the hands of the EA			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	