

Compliance plan for Genesis Material Change – 2018

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 of schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 25-Jun-18</p>	<p>Credit disconnection status changes not provided to the registry within 5 business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>There are no processes in place to upload credit disconnections at the time of the disconnection. Other disconnection update timeframes have moderate controls.</p> <p>The impact on settlement is minor because status discrepancies are identified at the time of submission where there is consumption on inactive ICPs and these are then remedied. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Genesis Energy will be addressing credit disconnection process post go-live for both brands		Dec 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Once code has changed, Gentrack functionality will manage status updates to the registry. Exceptions will be managed through a report.		Dec 2018
		Identified

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 25-Jun-18</p>	<p>Gentrack does not automatically update the status to inactive for credit disconnections</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>There are no processes in place to upload credit disconnections at the time of the disconnection. The controls for other inactive events are moderate to strong.</p> <p>The impact on settlement is minor because status discrepancies are identified at the time of submission where there is consumption on inactive ICPs and these are then remedied. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Genesis Energy will be addressing credit disconnection process post go-live for both brands		Dec 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Once code has changed, Gentrack functionality will manage status updates to the registry. Exceptions will be managed through a report.		Dec 2018
		Identified