

Compliance plan for Horizon Networks Distributor 2022

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Oct-20 To: 23-Feb-22	Registry information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because they have been strengthened during the audit period, but there are still small improvements that can be made. The audit risk rating is low as the volume and impact of the discrepancies will have a minimal impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
Updates/corrections completed during audit	18/03/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
To prevent initial electrical connection discrepancies, the new process involves tracking new connection registry timeframes in a newly developed spreadsheet to ensure each step of the process is validated. A weekly report is also issued by the regulatory team to highlight any discrepancies/delays. The administrator will then investigate, review, and correct the registry records.	18/03/2022	

Participants may request distributors to create ICPs			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 11.5(3) From: 07-Sep-21 To: 08-Mar-22	23 of 78 ICPs since July 2021 not created within three business days. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong at the time of the audit. The NC1 tracking spreadsheet along with staff training and the support of the previous person managing new connections means the process is now functioning as it used to. 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
Updates/corrections completed during audit		18/03/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
To ensure the creation of an ICP identifier is completed within 3 business days all new NC1 (New Connection request) are tracked through a tracking spreadsheet to ensure each step of the process is completed within the required timeframes. A weekly report is also issued by the regulatory team to highlight any delays/discrepancies. The administrator will then investigate, review, and correct the records in the registry as required.		18/03/2022	

Provision of ICP Information to the registry			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7 From: 30-Nov-21 To: 16-Mar-22	One initial electrical connection date missing. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. The audit compliance report is monitored and an additional "NC1" spreadsheet is now in place to track all new connections. There is no impact on settlement. The only potential impact is where a trader may wish to compare their active date to the IECD, so the impact is considered minor, leading to an audit risk rating of low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Updates/corrections completed during audit		18/03/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
To prevent a similar issue in the future, all new connections are tracked through the NC1 spreadsheet, and a service level agreement established with the livening agent. To ensure compliance the administrator will highlight any missing information to the livening agent and ensure these are updated. A weekly report is issued by the regulatory team, the administrator will investigate, review, and correct any delays/discrepancies identified.		18/03/2022	

Timeliness of Provision of ICP Information to the registry		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 08-Jun-21 To: 19-Sep-21	Two ICPs made "ready" after electrical connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Updates/corrections completed during audit		18/03/2022
Preventative actions taken to ensure no further issues will occur		Completion date
To ensure timeliness of provision of ICP information to the registry the new NC1 tracking spreadsheet to ensure each step of the process is validated before and after each registry event. A weekly report is also issued by the regulatory team to highlight any discrepancies. The administrator will then investigate, review, and correct the records.		18/03/2022
		Identified

Timeliness of Provision of Initial Electrical Connection Date			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Oct-20 To: 23-Feb-22	60 (18.6%) late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as there are delays from the field that cause Horizon to update the registry late. There is no impact on settlement. The only potential impact is where a trader may wish to compare their active date to the IECD, so the impact is considered minor, leading to an audit risk rating of low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Updates/corrections completed during audit		18/03/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The ensure timeliness of provision of initial electrical connection date, the processes have been improved by the administration team and will require follow up with the livening agents to ensure we achieve compliance, in addition a service level agreement with the livening agent will ensure we have the required information back in time to update the registry records. A weekly report is issued by the regulatory team, the administrator will investigate, review, and correct any discrepancies identified.		18/03/2022	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Oct-20 To: 23-Feb-22	Updates to registry backdated greater than 3 business days of the event. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The audit controls are rated as moderate. The lack of interface to the registry can make timeliness difficult to achieve due to the manual checks in the registry to monitor updates made by other participants and the requirement to manually change the event date can make events appear to be backdated. The audit risk rating is low as there is only a minor impact on participants with late updates.		
Actions taken to resolve the issue		Completion date	Remedial action status
Updates/corrections completed prior or during audit		18/03/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Horizon Networks is moving to a new system AXOS registry manager which does interface with the registry, this will help reduce the effort of updating our internal system and the registry. Overall this will strengthen our controls and improve the timeliness. A weekly report is issued by the regulatory team, the administrator will investigate, review, and correct any discrepancies identified.		18/03/2022	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 01-Oct-20 To: 23-Feb-22	Two active ICPs with addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as the reporting in place provides good visibility of this, so these are addressed. The audit risk rating is low as this has a minor impact on traders because addresses are relied on for meter reading and disconnection purposes.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will investigate the missing GPS locations for identified addresses, these will be verified and updated in the registry	01/06/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
A report to identify missing GPS locations has been developed and will be issued by the regulatory team weekly, the administrator will investigate, review, and update any missing GPS locations.	31/03/2022	

Distributors to Provide ICP Information to the Registry		
Non-compliance	Description	
Audit Ref: 4.6 With: Clause 7(1)(p) of Schedule 11.1 From: 01-Oct-20 To: 23-Feb-22	One initial electrical connection date missing. Three incorrect initial electrical connection dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. They have been improved during the audit period. The audit risk rating is low as there were only three incorrect initial electrical connection dates identified.	
Actions taken to resolve the issue	Completion date	Remedial action status
Updates/corrections completed during audit	18/03/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The administration process of capturing initial electrical connection date has been changed to achieve compliance, this involves talking to the living agent and tracking of the process in the NC1 spreadsheet, and a service level agreement established with the living agent. To ensure compliance the administrator will highlight any missing information to the living agent and ensure these are updated. A weekly report is issued by the regulatory team, the administrator will investigate, review, and correct any delays/discrepancies identified.	18/03/2022	