

Compliance Plan 2022

Marlborough Lines Ltd

Non-compliance	Description		
<p>Audit Ref: 2.1 With: <i>Clause 11.2(1) and 10.6(1)</i></p> <p>From: 01-Sep-20 To: 28-Feb-22</p>	<p>Registry information missing for a relatively small number of distributed generation ICPs and IECD. Updates to registry late for IECD, pricing, address, and network information.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls recorded as strong because exception reporting is demonstrated as being effective by relatively low number of errors. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>MLL will continue to request the provision of accurate and timely data from field contractors so that relevant information can be updated appropriately.</p> <p>MLL will continue to run reports comparing data held in its ICP management system against Registry data to identify discrepancies and take action accordingly.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
Audit Ref: 3.4 With: <i>Clause 7(2) of Schedule 11.1</i> From: 01-Sep-20 To: 28-Feb-22	7 x (1.5%) ICPs were made Active prior to being made Ready in the Registry. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong because exception reporting was demonstrated as being effective in identifying the issues and promptly correcting it. The audit Risk Rating is assigned as low due to very low occurrence with minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
No actions proposed. MLL sees this as a one-off discrepancy and does not believe that it will occur again.		n/a	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
n/a		n/a	

Non-compliance	Description		
Audit Ref: 3.5 With: <i>Clause 7(2) of Schedule 11.1</i> From: 01-Sep-20 To: 28-Feb-22	6 ICPs (1.3%) connected during the audit period had Initial Electrical Connection dates populated in the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Three or more times previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as strong because exception reporting was demonstrated as being effective. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL continues to run the daily report to compare differences in connections from the previous day. This allows MLL to see which ICPs have been connected overnight and where we may need to follow up to obtain the relevant paperwork. MLL adds comments to the Gentrack connection that the report has picked up that the connection has been connected and that no paperwork has been provided. MLL periodically requests that external contractors submit new electrical connections paperwork in a timely manner.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
Audit Ref: 4.1 With: <i>Clause 8 Schedule 11.1</i> From: 01-Sep-20 To: 28-Feb-22	Registry information not updated within 3 business days from the event date for a relatively low percentage of transactions. Potential impact: Low Actual impact: Low Audit history: Three or more times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as moderate as exception reporting can be improved. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL will continue to emphasise the requirement for timely return of information from external contractors so that information can be updated within required timeframes.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
Audit Ref: 4.6 Wi With: 7(1) of Schedule 11.1th: From: 01-Sep-20 To: 28-Feb-22	The registry contains incorrect information for a number of ICPs with respect to distributed generation (D.G.) installations 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	Controls recorded as strong because exception reporting and monitoring is effective. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL routinely reviews the NMR (metering) report (from the Registry) which highlights connections where DG has been installed. MLL compares this report to corresponding information in Gentrack and where there are discrepancies will update.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Non-compliance	Description		
Audit Ref: 4.12 With: <i>Clause 23</i> <i>Schedule 11.1</i> From: 01-Sep-20 To: 28-Feb-22	Three new price category codes were entered into the registry tables 8 days prior to the start date for the new codes rather than the two months required by the code. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls recorded as moderate because the changes had been communicated in advance with Retailers. The audit Risk Rating is assigned as low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
MLL has set a calendar reminder in relevant staff's outlook accounts to ensure that any new price category codes that come in from 1 April 2023 will be done so in advance of the 2 month requirement.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		20 January 2023	