

Compliance plan for The Lines Company Distributor 2022

Audit Submission		
Non-compliance	Description	
Audit Ref: 1.12 With: Clause 11.7 From: 16-Mar-22 To: 31-Mar-22	Late submission of audit report. 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 as TLC made every effort to complete this audit by the due date. The audit risk rating is assessed to be low as the audit report will be submitted in sufficient time to not impact the setting of the next audit due date.	
Actions taken to resolve the issue	Completion date	Remedial action status
The audit was planned to be onsite but required postponing due to illness, COVID close contacts etc. A new onsite date was set, however, illness prevented this date, too. The audit was then conducted over Teams and took multiple days. The timing of the audit also coincided with distributor price-setting and multiple other audits meaning mitigations in place were not available.	19/04/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Requirement to provide complete and accurate information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11.2(1)</p> <p>From: 01-Sep-20 To: 30-Nov-21</p>	<p>Data validation reporting not in place since Axos was deployed in October 2021 to compare registry vs. Axos data which could result in data mismatches not being identified. One instance was identified of this.</p> <p>Nine ICPs incorrectly recorded against NSP WKM0331.</p> <p>Five ICPs had incorrect initial electrical connection dates, which were corrected during the audit.</p> <p>ICP 0003271548WM74C has no initial electrical connection date recorded.</p> <p>Five of seven ICPs sampled had the incorrect distributed generation kW value. Backdated corrections to the capacities were processed during the audit.</p> <p>Three of seven ICPs sampled had the incorrect date of distributed generation installation recorded.</p> <p>Two ICPs with a generation value but no fuel type and an installation type of L.</p> <p>ICP 0001113502WM7A6 incorrectly recorded with unmetered load.</p> <p>Three ICPs with the incorrect wattage value recorded in the unmetered load details.</p> <p>Five of ten ICPs sampled decommissioned for the incorrect event date.</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have rated the controls as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is assessed as low as the volume of errors is small in relation to the number of ICPs managed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Continuing to correct the issues listed.	31/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Further training and discrepancy reporting.	31/05/2022 and ongoing	

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11.2(2) and 10.6(2) From: 01-Sep-20 To: 30-Nov-21	Data validation reporting not in place since Axos was deployed in October 2021 to compare registry vs. Axos data which has resulted in data mismatches not being identified. One instance was identified of this. 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	I have rated the controls as moderate as they will mitigate risk most of the time but there is room for improvement. The audit risk rating is assessed as low as the volume of errors is small in relation to the number of ICPs managed.	
Actions taken to resolve the issue	Completion date	Remedial action status
Discrepancy reporting.	5/04/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Adopt recommended reviewing times of the different reports – minimum of weekly or monthly.	Ongoing	

Provision of ICP Information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7 From: 30-May-17 To: 31-Dec-21	One electrically connected ICP with no initial electrical connection date populated. 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 as the processes in place will mitigate risk to an acceptable level. The audit risk rating is assessed to be low as only one ICP was affected, and this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Connections updated process documentation and trained new staff to forward IECD documentation.		31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing training and reminders.		Ongoing	

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Apr-20 To: 24-May-21	Six ICPs not created prior to electricity being traded. 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 now as TLC now has a better understanding of reconciliation impacts due to the change in line charge billing. The audit risk rating is assessed to be low as only three ICPs were affected, and the market impact is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Training and a better understanding of reconciliation impacts.	13/04/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing training and process reminders.	Ongoing.	

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-Jul-17 To: 04-Oct-21	Late population of the initial electrical connection dates for 28 ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as strong as the processes in place will mitigate risk to an acceptable level. The audit risk rating is low this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
More trained staff actively populating IECD.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
More trained staff actively populating IECD.	31/03/2022	

Management of "new" status		
Non-compliance	Description	
Audit Ref: 3.13 With: Clause 13 of Schedule 11.1 From: 01-Oct-21 To: 31-Mar-22	ICP 110000009WM2FC incorrectly recorded at the "new" status. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as there is room for improvement. The audit risk rating is low as only one ICP was affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Axos now has a dropdown box for status, it is easy to filter to "New" and identify these ICPs.	5/04/2022 Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Check the status every few days using the above tool	Ongoing	

Electrical connection of a point of connection		
Non-compliance	Description	
Audit Ref: 3.16 With: Clause 10.33A From: 01-Sep-20 To: 30-Nov-21	No trader acceptance prior to the electrical connection of new streetlights to the network. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak as the process does not have sufficient controls to mitigate risk to an acceptable level. The audit risk rating is assessed to be low as the volume of new streetlights on the TLC network is expected to be small.	
Actions taken to resolve the issue		Completion date
Internal parties to collaborate to resolve issues of missing new or additional streetlight information.		31/05/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Plan of action from above.		31/05/2022
		Investigating

Meter bridging		
Non-compliance	Description	
Audit Ref: 3.18 With: Clause 10.33C From: 01-Sep-20 To: 30-Nov-21	Traders not notified of bridged meters. 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 as TLC have updated their processes so that the trader will be notified going forward. The audit risk rating is assessed to be low as the volume of bridged meters is small and therefore the potential impact of reconciliation is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Manager Network Services has been made aware of the issue.	17/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process updates and training.	31/05/2022	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 of Schedule 11.1 From: 01-Sep-20 To: 30-Nov-21	Ten late address updates. 521 late pricing events. 69 late updates to decommissioned status. 13 late distributed generation updates. Eight late network updates to other network fields, excluding initial updates to initial electrical connection dates and the addition of distributed generation. 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	Controls are rated as moderate with room for improvement. The audit risk rating is assessed as low as the impact on reconciliation is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Check: daily for status 999, weekly DG updates, weekly status 1 and 6, and monthly status 0.	Commencing 04/04/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above.		

Notice of NSP for each ICP			
Non-compliance	Description		
Audit Ref: 4.2 With: Clause 7(1),(4) and (5) Schedule 11.1 From: 15-Oct-20 To: 30-Oct-21	Nine ICPs incorrectly recorded against NSP WKM0331. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as weak as the NSP data is static data which could result in incorrect NSP selections and there is room for improvement in the discrepancy reporting to check for outliers. The audit risk rating is low as the ICPs with the incorrect NSPs were all connected to another NSP in the same balancing area.		
Actions taken to resolve the issue		Completion date	Remedial action status
Tested removing NSP choices from the dropdown box – follow up with Axos to see whether the change will affect anything else, plus further training.		28/04/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
A shortened list to choose from and removal of WKM.		28/04/2022	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Sep-20 To: 30-Nov-21	Two ICPs with addresses not readily locatable. One ICP with the incorrect town recorded, which was corrected during the audit. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong overall as they mitigate risk to an acceptable level. The audit risk rating is low based as the number of ICPs with no readily locatable address is very small.	
Actions taken to resolve the issue		Completion date
Adopted recommendation and further detailed reviews of addresses.		28/04/2022
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		28/04/2022
Remedial action status		
Identified		

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6 With: 7(1) of Schedule 11.1</p> <p>From: 01-Sep-20 To: 30-Nov-21</p>	<p>Five ICPs had incorrect initial electrical connection dates, which were corrected during the audit.</p> <p>ICP 0003271548WM74C has no initial electrical connection date recorded.</p> <p>Five of seven ICPs sampled had the incorrect distributed generation kW value. Backdated corrections to the capacities were processed during the audit.</p> <p>Three of seven ICPs sampled had the incorrect date of distributed generation installation recorded.</p> <p>Two ICPs with a generation value but no fuel type and an installation type of L. ICP 0001113502WM7A6 incorrectly recorded with unmetered load.</p> <p>Three ICPs with the incorrect wattage value recorded in the unmetered load details.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have rated the controls as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is assessed as low as the volume of errors is small in relation to the number of ICPs managed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Some are resolved while others are being investigated.	31/05/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Internal parties to collaborate to resolve issues of missing new or additional streetlight information with the planned outcome being an action plan.		

Management of “decommissioned” status			
Non-compliance	Description		
Audit Ref: 4.11 With: Clause 20 of Schedule 11.1 From: 01-Sep-20 To: 30-Nov-21	Five of ten ICPs sampled decommissioned for the incorrect event date. 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 are rated as strong as the registry update process has improved over the audit period. Further training has been carried out. The audit risk rating is assessed to be low as the first inactive date and therefore reconciliation have been correctly recorded for all but one of the ten ICPs sampled.		
Actions taken to resolve the issue		Completion date	Remedial action status
Further training was provided and monthly of status 1,6.		06/04/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing training and decommission process review.		31/05/2022	

Maintenance of price category codes		
Non-compliance	Description	
Audit Ref: 4.12 With: 23 of Schedule 11.1 From: 01-Jul-21 To: 01-Sep-21	Price category code CAPDED not notified two months before coming into effect. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as strong, as the processes in place are robust. The audit risk rating is low as this affected only 89 customers and the traders of these customers were all aware of the price category code despite it being notified to the registry late.	
Actions taken to resolve the issue		Completion date
No action is required.		
Preventative actions taken to ensure no further issues will occur		Completion date
We are now aware of the requirement but note that this was completed in consultation with retailers.		
		Identified

Responsibility for metering information for NSP that is not a POC to the grid		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 10.25(1) & 10.26(1) From: 23-Sep-21 To: 30-Nov-21	WKM0331 meter was uncertified from 23/09/21-19/10/21 The meter certification expiry date was not updated within 20 business days of the meter certification. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate with room for improvement. The audit risk rating is assessed as low as the impact on reconciliation is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Discussed with Influx.	06/04/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Set tasks in calendars as a reminder of expiry dates.	06/04/2022	