

## Compliance plan for Stride Property Ltd (DMFL) 2019

Title: Timeliness of Provision of ICP Information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.4</p> <p>With: Clause 7(2) of Schedule 11.1</p> <p>From: 01-Jun-18</p> <p>To: 05-Jun-18</p>	<p>Ten late updates to “ready” status for new connections.</p> <p>Potential impact: Low</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		
<b>Low</b>	<p>The controls are rated as strong, because most of the updates were made on time or very close to the initial electrical connection date.</p> <p>The impact is low, because “ready” status was recorded within one business day of initial electrical connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This was a conversion from a customer network to an Embedded Network – the update to Ready should have been made on the 01/06/2018 which was BD1 however it was not completed until BD2 which was the 05/06/2018.		05/06/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have increased our process documentation and resource in this area and are confident that this will not reoccur in the future – there is some risk for us when a network goes live on the 1 <sup>st</sup> of the month and this falls on a weekend day as we cannot set at ICP to ready without the NSP being active in Registry.		Ongoing	

Title: Timeliness of Provision of Initial Electrical Connection Date	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 02-Nov-18</p> <p>To: 01-May-19</p>	<p>ICPs 0000815450DFC4E and 0002422350DF9BC did not have initial electrical connection dates populated within ten business days of initial electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate as they are sufficient to ensure that initial electrical connection dates are updated on time most of the time. Paperwork is often sent to the retailer first, then passed to TENCO, which can cause delays in updating the initial electrical connection date.</p> <p>The impact is low because two ICPs were affected, and the updates were made within 22 days of initial electrical connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The correct IED was added when the ICP was set to Active by the Retailer		2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We use Salesforce to refresh to Registry daily – when an ICP is set to Active this comes through on our compliance dashboard which is checked daily and an update to Registry with the IED is made – a check between active date and meter cert date is also completed. As long as a retailer updates within 10 BD we will be compliant in this area.		Ongoing	

Title: Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 17-Apr-18</p> <p>To: 10-Dec-18</p>	<p>Three late status updates for ICPs 0003225122WFB93, 0242002311WFF63, and 0003225140WF4E6.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. In most cases the late updates were caused by another party's late registry update.</p> <p>The risk is low as a small number of ICPs are affected, and the registry was updated within five business days of the event date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The 2 late and retrospective updates by Retailers that causes us non-compliance should be dealt with by their own audit reports		Through the audit period	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We continue to focus on our level of Compliance, understanding of process and depth of the team to ensure we have coverage	Ongoing	

Title: ICP location address			
Non-compliance	Description		
Audit Ref: 4.4 With: Clause 2 Schedule 11.1  From: 01-Sep-16 To: 09-Aug-19	Eight ICPs had duplicate addresses, and were corrected during the audit. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate, as they are sufficient to ensure that most ICPs will have unique and locatable addresses. The impact is low because in most cases address information was correct, and the affected addresses have been updated.		
Actions taken to resolve the issue		Completion date	Remedial action status
The duplicate addresses were a result of us updating the property name on the ICP's as a result of change of ownership from Westfield – however this change resulted in 8 ICP's not having unique addresses.		August-2019	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We are in the process of moving SF data into ODS tables that will allow us to run regular SQL queries to monitor any non-unique address's that are inherited or come about following an update		Early 2020	

Title: 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) and 10.25(3)  From: 23-Nov-17 To: 18-Mar-19	Meter certification details were updated more than 20 business days after the certification date for WQQ0011. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are strong, because the delays were primarily caused by the MEP being unable to provide information on time.</p> <p>The impact is low. The meter was certified at all times.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The late delivery of meter recert paperwork from the MEP caused our noncompliance – we actively monitor and manage meter cert expiry dates however where the MEP certifies early and does not send us paperwork when this occurs we end up breaching the 20 BD rule here.		During the audit period	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TENCO submitted a code change request on 29/05/19, asking the Authority to consider including embedded network gate meter details on the registry, so that the MEP can maintain these details. The request is under consideration. We continue to work with AMS and FCLM on the timely provision of metering certs and proactively monitor and chase where certification expiry is pending.		Ongoing	

Title: Responsibility for metering information when creating an NSP that is not a POC to the grid			
Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: Clause 10.25(2)</p> <p>From: 01-May-18</p> <p>To: 19-Jun-18</p>	<p>Meter certification details were updated late for new NSP DCQ0011.</p> <p>Potential impact: Low</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>The controls are strong, because the delays were primarily caused by the MEP being unable to provide information on time.</p> <p>The impact is low. The meter was certified at all times.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
For DCQ0011 this was a conversion from a customer network with a single tenant to an Embedded Network on the 01/06/2019 – the existing metering was recertified from the GN ICP to the EN ICP but this was after the fact and paperwork was late in coming to us from the MEP		19/06/2019	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We are requesting meter recerts as early as possible and could have put the GN ICP's meter cert date in the RM NSP metering table as the meter was not swapped out just recertified – we however opted to wait for the new paperwork to come to us which resulted in the non-compliance.	Ongoing	

Title: Creation of loss factors		
Non-compliance	Description	
<p>Audit Ref: 8.1 With: Clause 11.2</p> <p>From: 01-Jan-18 To: 01-Sep-19</p>	<p>Loss factor codes DMFL11 was assigned to 17 ICPs connected to WCW0111 which did not have parent network loss codes consistent with the loss code. Corrections were processed for all of the ICPs during the audit.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are moderate, because 97% of ICPs had the correct loss factor assigned. DMFL intends to take corrective action to prevent recurrence.</p> <p>The impact is low because there was a small impact on loss factors. DMFL11 has a loss factor of 1.0288 and DMFL15 has a loss factor of 1.0369.</p>	
Actions taken to resolve the issue		Completion date
Upon notification from Tara we updated the incorrect loss factors as soon as possible and to align with the 1 <sup>st</sup> of the month for reconciliation purposes		01/09/2019 & 01/11/2019
Preventative actions taken to ensure no further issues will occur		Completion date
We believe our controls are strong in this area and we monitor changes from the local area networks that would impact our loss codes, the incorrect Loss Code on these 17 ICP's was a one off as a result of the transfer of ICP's from a previous network operator.		Ongoing