

# Compliance Plan SMRT Distributor 2023

Provision of information			
Non-compliance	Description		
Audit Ref: 2.2 With: 15.35  From: 01-Jun-22 To: 30-Jun-22	Failure to submit data to the reconciliation manager NSP OWS0011-SMRT by business day four.  Potential impact: High  Actual impact: Medium  Audit history: None  Controls: Strong  Breach risk rating:2		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	The controls are recorded as strong as the process controls have been strengthened since this incident to prevent this occurring again in the future.  The impact on settlement and participants was significant enough to raise a breach; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Data was submitted around 5pm on the due date.		7/6/22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Although this event was unusual due to changes of staff, a more robust process has been put in place, as covered by the self-breach.		ongoing	

<b>Arrangements for metering equipment provision</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.13 With: 10.36  From: 28-May-22 To: 31-Dec-22	MEP not recorded for NSP OWS0011. Potential impact: High Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating:2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. There is no impact on settlement or participants, therefore the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Details were updated on the day we received them; a delay in receiving paperwork along with delays in liveness meant that we didn't have a certification date to enter and hence no MEP was entered.	9/3/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Obtaining paperwork is an ongoing issue. We currently request repeatedly until we get it.	Ongoing	

Provision of NSP submission information		
Non-compliance	Description	
Audit Ref: 12.5 With: 15.10  From: 01-Jun-22 To: 30-Jun-22	Failure to submit data to the reconciliation manager NSP OWS0011-SMRT by business day four.  Potential impact: High Actual impact: Medium Audit history: None Controls: Strong Breach risk rating:2	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	The controls are recorded as strong as the process controls have been strengthened since this incident to prevent this occurring again in the future.  The impact on settlement and participants was significant enough to raise a breach; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Data was submitted around 5pm on the due date	7/6/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Although this event was unusual due to changes of staff, a more robust process has been put in place, as covered by the self-breach.	ongoing	

