

Compliance plan for Top Energy- 2023

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 01-Mar-22 To: 31-Mar-23	Registry information missing for a small number of distributed generation ICPs. Incorrect date in the registry when distributed generation was installed Potential impact: Low Actual impact: Low Audit history: Many times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. There are some areas which require more monitoring during the month. 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
We will continue to work to ensure the registry information is accurate. Initially, we will correct all ICP identified with missing or misaligned data and review why this occurred.		Ongoing August 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process and work instructions to be update regarding the Distribution Generation installation date as agreed with the Auditor.		August 2023	

Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 01-Mar-22 To: 31-Mar-23	<ul style="list-style-type: none"> • IECD for 36 ICPs was uploaded later than 10 business days • Incorrect IECD for three ICPs Potential impact: Low Actual impact: Low Audit history: Many times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. The process is well controlled but a lack of resources caused some delays in uploading IECD for a few ICPs. The audit Risk Rating is low due to minimal impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will continue to work on ensuring the registry information is accurate. All discrepancies identified have been corrected.		Ongoing June	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued training of new staff on the process. Monthly review of the EA Compliance report will continue. Investigate developing an automated report that shows all active ICPs with no IEC date. This can be run weekly to ensure that all IEC dates are updated within 10 business days.		Ongoing Each month Dec 2023	

Non-compliance	Description		
Audit Ref 4.1 With: 8 of Schedule 11.1 From: 01-Mar-22 To: 31-Mar-23	Small number of the registry event updates backdated more than three business days 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 the checks in place will mitigate risk most of the time. The implementation of the Axos Registry Manager has helped greatly. 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
Our objective remains that of achieving an accurate Registry.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A new process has been implemented for decommissioning ICPs which addresses the issues highlighted. This was done before the Audit. Investigate developing a report to identify ICPs with distribution generation but the incorrect Installation type classifications. Our aim is for compliance however where ensuring the registry is accurate causes non-compliance, we believe this is acceptable. We do however wish to minimise this as much as possible. To ensure this we will continue to have the following controls in place: <ul style="list-style-type: none"> • Review of EA Audit report to monitor compliance and ensure processes are working. • Require internal signoff of changes greater than 3 business day 		May 2023 Dec 2023	

Non-compliance	Description		
Audit Ref: 4.12 With: 23 of Schedule 11.1 From: 01-Mar-22 To: 31-Mar-23	Two price category codes were recorded in the registry table late Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recoded as strong. Two of four new price category codes were recorded in the registry late. It was already identified in the previous audit report and a corrective action was implemented. No impact on settlement outcomes. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue identified in this Audit occurred before our last audit was completed. After the last Audit the preventative action of including this task in our Compliance monitoring system was implemented.		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required			