

## Compliance plan for Accucal MEP 2023

| Changes to Registry Records  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| Audit Ref: 4.10<br>With: Clause 3 of Schedule 11.4<br><br>From: 19-Apr-23<br>To: 21-Apr-23   | One record updated on the registry later than 10 business days due to late nomination by the trader.<br><br>Potential impact: Low<br><br>Actual impact: Low<br><br>Audit history: Multiple times<br><br>Controls: Strong<br><br>Breach risk rating: 1   |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | I have recorded the controls as strong in this area because Accucal has checks in place to identify and resolve discrepancies and there was only one late update.<br><br>The impact on participants, customers or settlement could be minor where a tariff change may be required; therefore, the audit risk rating is low. |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| We don't believe there is much we can do here, this was due to the Network not communicating with the Trader until after liveness and therefore was out of our hands | N/A   | Cleared                |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| N/A. Existing controls for timely registry updates are working.  | N/A   |                        |

| MEP Response to Switch Notification  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| Audit Ref: 6.1<br>With: 1(1) of Schedule 11.4<br>From: 13-Jul-22<br>To: 12-May-23  | Four late MN files.<br>Potential impact: Low<br>Actual impact: None<br>Audit history: Once<br>Controls: Strong<br>Breach risk rating: 1                 |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | The controls are recorded as strong because they mitigate risk to an acceptable level.<br>There was no impact; therefore, the audit risk rating is low. |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| ACCM understanding of timely acceptance of nominations is now correct and we will monitor registry files at least weekly | 18 <sup>th</sup> Aug 2023   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| System to notify of registry notifications to be enhanced  | By 31 Dec 2023  |                        |

| Cancellation of Certification   |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| Audit Ref: 6.4<br>With: Clause 20 of Schedule 10.7<br><br>From: 10-Jul-23<br>To: 16-Aug-23  | Certification not cancelled on the registry within 10 business days ICP 0003133903AA777 where the inspection was not conducted by the due date.<br><br>Potential impact: Medium<br><br>Actual impact: None<br><br>Audit history: Once<br><br>Controls: Strong<br><br>Breach risk rating: 1   |                        |
| Audit risk rating   | Rationale for audit risk rating  |                        |
| <b>Low</b>  | I have recorded the controls as strong in this area because most processes are managed with sufficient controls to avoid cancellation of certification.<br><br>The inspection is required to determine if there is any impact, but this is unlikely, therefore the audit risk rating is low. |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| Certification has been cancelled as of inspection window expiry. General ACCM team are being educated as to impact of this when we are the MEP. This has only arisen due to kick-back from customer claiming they know nothing about the MEP agreement. Negotiations are on-going to resolve this issue | 16 Aug 2023  | Identified             |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| Registry check system to be enhanced to flag when installation certification needs to be cancelled  | By 31 <sup>st</sup> Dec 2023   |                        |

| Certification and Maintenance  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7</p> <p>From: 19-Jan-20</p> <p>To: 17-Aug-23</p>   | <p>Certification expired for one metering installation.</p> <p>Certification cancelled for one metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>   |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | <p>I have recorded the controls as strong as Accucal has a good process for monitoring certification expiry dates and has taken reasonable steps to arrange to recertify.</p> <p>The impact on settlement is recorded as low because it is unlikely that the lack of certification will lead to failure or inaccuracy of the metering installation. The audit risk rating is recorded as low.</p> |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| <p>Actions for ICP 0003133903AA777 are detailed in previous section. New switchboard for ICP 1000024020BP627 is currently being installed and we are scheduled to complete certification in October 2023</p> | By Nov 2023   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| <p>Registry check system to be enhanced to flag when installation certification needs to be cancelled and will also be flagged to admin staff as well as the Technical Manager</p>                           | By 31 <sup>st</sup> Dec 2023  |                        |

| Category 2 to 5 Inspections  |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| Audit Ref: 8.2<br>With: Clause 46(1) of Schedule 10.7<br><br>From: 24-Jun-23<br>To: 16-Aug-23        | Inspection not conducted for ICP 0003133903AA777 within the allowable timeframe.<br><br>Potential impact: Low<br><br>Actual impact: Low<br><br>Audit history: None<br><br>Controls: Strong<br><br>Breach risk rating: 1  |                        |
| Audit risk rating  | Rationale for audit risk rating  |                        |
| <b>Low</b>   | The controls are recorded as strong, because reporting is in place and Accucal has been attempting to contact the customer and arrange access for some time.<br><br>The impact on settlement and participants could be minor; therefore, the audit risk rating is low. |                        |
| Actions taken to resolve the issue   | Completion date  | Remedial action status |
| ACCM team working on gaining site access and will complete the re-certification as soon as possible. | By end of Aug 2023   | Identified             |
| Preventative actions taken to ensure no further issues will occur                                    | Completion date  |                        |
| A review of MEP agreements is to be completed to ensure similar problems don't occur                 | By 31 <sup>st</sup> Dec 2023   |                        |