

## Compliance plan for Firstlight Distributor – 2023

Requirement to provide complete and accurate information			
Non-compliance	Description		
<p>Audit Ref: 2.1 With: Clause 11.2(1)</p> <p>From: 01-Jan-22 To: 22-Jul-23</p>	<p>All ICPs created since 1 April 2023, have the dedicated flag set to “no” rather than “yes”.</p> <p>Six missing electrical connection dates.</p> <p>At least six incorrect event dates for IECDs.</p> <p>Distributed generation updates have not occurred since approximately 1 June 2023.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All active ICPs with non-dedicated NSP changed to dedicated.		18/7/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
Tenco compliance monitoring implemented and Lynda McIntosh received training to action any DG, IECD and Decommissioning queries.		31/07/2023	

Requirement to correct errors		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11.2(2) and 10.6(2)  From: 01-Jan-22 To: 22-Jul-23	IECD corrections from the previous audit not all conducted. Registry not updated with distributed generation information since approximately 1 June 2023. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
DG updates in progress		31/8/2023
Preventative actions taken to ensure no further issues will occur		Completion date
Tenco preparing DG reporting on a regular basis and Linda McIntosh training to cover the follow ups.		31/7/2023
		Identified

Provision of ICP Information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7  From: 01-Jan-22 To: 19-May-23	Six electrically connected ICPs with no initial electrical connection date populated at the time the audit analysis was conducted.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Weak  Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as weak because three of the examples were present during the last audit, and whilst there is reporting available to identify these missing fields, it appears they were not actioned.  There were only six initial electrical connection dates missing. The impact on participants is minor because this field is used to validate other fields against.		
Actions taken to resolve the issue		Completion date	Remedial action status
IECD dates now followed up on.		28/7/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Tenco helping monitor ICP compliance in a temporary contract.		31/07/2023	

<b>Timeliness of Provision of Initial Electrical Connection Date</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Jan-22 To: 11-Apr-23	Late population of the initial electrical connection date for 25 (10%) of ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong, as they are sufficient to ensure that the timeliness of initial electrical connection dates are at an acceptable level. Firstlight intends to have coverage for the Christmas period this year. The audit risk rating is assessed to be low as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
Christmas shutdown will not apply to ICP administration function.		
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1  From: 01-Jan-22 To: 11-Apr-23	Some price, network and status changes were backdated. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	At the time of the audit the controls were weak, because updates were not being conducted for some fields due to key personnel having left the company.  The audit risk rating is low as the updates have little to no impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
Lynda M and Tomas K received additional training to ensure coverage.		27/07/2023
		Choose an item.

<b>Distributors to Provide ICP Information to the Registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.6 With: Clause 7(1)(m) & (p) Schedule 11.1  From: 01-Jan-22 To: 11-Apr-23	Distributed generation updates have not occurred since approximately 1 June 2023. Six ICPs with missing initial electrical connection dates. All ICPs since 1 April 2023 recorded as non-dedicated. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate because there is room to improve the resourcing of some functions and the monitoring of discrepancy reports to ensure data accuracy.  The audit risk rating is recorded as low as the overall number of variances is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
DG updates are now being followed up on.		Choose an item.
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Tenco are helping monitor compliance the training has been delivered to ensure future compliance.	31/7/2023	