COMPLIANCE PLAN NELSON ELECTRICITY

22 August 2017

| Non-compliance | Description | | |
|---|--|--------------------|------------------------|
| Audit Ref: 3.5 With: 7(2A) of schedule 11.1 | Distributor provides initial energisation date to registry. The participant did not provide the initial energisation date for 5 new ICPs within the required period. | | |
| From: 03-Jan-16 To: 13-Jul-17 | Potential impact: None Actual impact: None Audit history: Once Controls: Weak Breach risk rating: 3 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Audit risk is assessed as Low because no participant or reconciliation process depends on this information and there has not been any material adverse impact. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Reminding retailer's agent to provide information in a timely manner. | | | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Reminding retailer's agent to provide information in a timely manner. | | | |

| Non-compliance | Description | | |
|--|---|--------------------|------------------------|
| Audit Ref: 4.1 With: 8 of schedule 11.1 | Participant provides changes to registry information within 3 business days of the change taking effect. Participant did not provide information within 3 business days as tabulated in audit report - the majority of these are retailer requested backdating. | | |
| From: 03-Jan-16 | | | |
| To: 13-Jul-17 | Potential impact: Low | | |
| | Actual impact: Low | | |
| | Audit history: Once | | |
| | Controls: Moderate | | |
| | Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls in place are satisfactory for the small volume of changes made and no change has had any material impact on the market, any participant or any consumer. | | |
| Actions taken to resolve t | the issue | Completion date | Remedial action status |
| Reminding retailers or the timely manner. | ir agent to provide information in a | | Identified |
| Preventative actions take | n to ensure no further issues will occur | Completion date | |

| Reminding retailers or their agent to provide information in a | | |
|---|--|--|
| timely manner. Where appropriate make date of change as at date | | |
| of receipt of change. | | |

| Non-compliance | Description | | |
|-------------------------------------|---|--------------------|------------------------|
| Audit Ref: 4.4 With: Clause 2 of | Address information provided for 3 ICPs would not allow ready location of the ICP. | | |
| schedule 11.1 | Potential impact: None | | |
| From: 03-Jan-16 | Actual impact: None | | |
| To: 13-Jul-17 | Audit history: Once Controls: Moderate | | |
| 10.15 50 17 | Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | NELS have adequate controls in place relative to the number of ICPs on their network. Only 2 ICPs at the same location have duplicate addresses, one is awaiting demolition. Confusion is common regarding the DUML ICP address. This non compliance is extremely minor. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| No action necessary | | 1/8/2017 | Identified |
| Preventative actions take occur | en to ensure no further issues will | Completion date | |
| No action necessary | | | |

| Non-compliance | Description | | |
|--|---|--------------------|------------------------|
| Audit Ref: 4.6 With: Clause 7 (1) of schedule 11.1 From: 03-Jan-16 To: 13-Jul-17 | Distributor maintains registry information. 1 active ICP with installation type L has DG details. 31 ICPs are identified that have chargeable capacity missing. 107 HHR metered ICPs have chargeable capacity that may be calculated from metering information. Potential impact: Low Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | This non compliance mainly concerns chargeable capacity values that may be calculated from metering information. NELS are aware of this situation and have chosen to continue with it as well as their processes for independently communicating chargeable capacity values to retailers. While a new entrant retailer could be confused over chargeable capacities, overall we consider the impact and risk of this alleged non compliance to be very low. | | |
| Actions taken to resolve | Actions taken to resolve the issue Completion Remedial action date | | Remedial action status |
| No Action | | | Identified |
| Preventative actions take occur | en to ensure no further issues will | Completion date | |

| No Action | |
|-----------|--|