

Compliance plan for Top Energy

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 16-Aug-16 To: 31-Aug-17	Unmetered load information is missing, incorrect information for embedded generation (solar) Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	We have recorded the controls as moderate. There are good reports in place to monitor the accuracy of data but there are still some areas which need more attention; no impact on settlement market because of the small number of ICPs therefore audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
As the audit mentioned, a lot of effort has been applied to achieve compliance in this area. Further actions for the year ahead: <ul style="list-style-type: none"> - Discuss with software vendor to add a field to track solar installs within Club ICP - Talk to MEP's re updating registry when meter is changed - Continue to work with councils and road authorities to improve unmetered records Re-enter IECD's that are missing		31 Mar 2018	Identified
		Ongoing	
		31 Dec 2018	
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continually review and improve our processes and invest in training to enhance our skills and knowledge of the code.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 2.2 With: 11.2(2)</p> <p>From: 16-Aug-16 To: 30-Aug-17</p>	<p>Incorrect data is proactively corrected but there are some outstanding issues effecting a small number of ICPs identified in the last audit</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		
Low	We have recorded the controls as moderate. There are good processes in place which require some enhancements; minor if at all impact on traders and settlement outcome, therefore audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>As the audit mentioned, a lot of effort has been applied to achieve compliance in this area. Further actions for the year ahead:</p> <ul style="list-style-type: none"> - Provide refresher training for the new staff on the ICP creation process - Continue to review reports to identify errors <p>Look at changing the time of day the upload/download process is completed to eliminate date variances</p>		<p>31 Dec 2018</p> <p>Ongoing</p> <p>31 Mar 2018</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continually review and improve our processes and invest in training to enhance our skills and knowledge of the code.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 7(A) of Schedule 11.1</p> <p>From: 23-Dec-16</p> <p>To: 21-Jun-17</p>	<p>Six ICPs out of 362 new connections had Initial Electrical Connection Date populated later than 10BD</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as strong. There are reports in place to monitor compliance in this area but maybe they should be run more often or maybe the correction of errors is too slow; Settlement outcome not effected therefore audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>As the audit mentioned, a lot of effort has been applied to achieve compliance in this area with the implementation of strong controls. Further actions for the year ahead:</p> <ul style="list-style-type: none"> - Review process for CT meters as we do not control these installations 		31 Mar 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We will continually review and improve our processes and invest in training to enhance our skills and knowledge of the code.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: 8 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 31-Aug-17</p>	<p>Some updates to the registry were done later than 3BD. They were mostly updates of the Status “decommissioned” and a clean-up of Initial Electrical Connection Date after the last audit</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We recorded controls as moderate. The company tries to restrict the number of backdated updates but to have the registry information correct as per clause 11.2 of the Code is more important. No impact on settlement outcome therefore audit risk rating recorded as low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Our policy remains that of achieving an accurate Registry as this is our understanding of the expectations of the Electricity Authority.</p> <p>No further actions are planned over and above our current process as in the attempt to have accuracy (through data cleansing), these events will occur from time to time.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We will continue to meet the objective of an accurate Registry even though at times this may mean an audit non-compliance at times.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 2 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 31-Aug-17</p>	<p>Four ICPs have identical addresses and for one ICP the address description does not allow the ICP to be readily located (GPS coordinates recorded)</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating:1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as strong. There are reports in place to monitor compliance in this area and only a small number of ICPs require correction; Settlement outcome not effected therefore audit risk rating is recorded as low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As per our last audit, we continue to actively apply GPS co-ordinates to newly created ICP's, or when they are visited for maintenance.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 4.6</p> <p>With: 7(1) of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 30-Aug-17</p>	<p>Incorrect information in the registry in relation to Initial Electrical Connection Date, connection of solar panels, UML</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>We have recorded the controls as moderate. There are reports in place to monitor compliance in this area but based on results it appears that these reports are not very effective; Settlement outcome not effected therefore audit risk rating is recorded as low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>As the audit mentioned, a lot of effort has been applied to achieve compliance in this area. Further actions for the year ahead:</p> <ul style="list-style-type: none"> - Discuss with software vendor to add in a field for solar installation dates / information - See why registry is using upload date rather than install date as this is the cause of several non-compliances. 		30 Mar 2018	Identified
Preventative actions need to be taken to ensure no further issues will occur		Completion date	
<p>We will continually review and improve our processes and invest in training to enhance our skills and knowledge of the code. We are also reviewing our ICP Management software requirements over the next 12 months.</p>			

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: 14 of Schedule 11.1</p> <p>From: 16-Aug-16</p> <p>To: 31-Aug-17</p>	<p>Top Energy receives confirmation from a trader accepting responsibility for the ICP after the registry changes the ICP status to “ready” because a proposed trader specified by a customer was uploaded</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		
Low	<p>We have recorded the controls as moderate. Top Energy has a good process in place to receive confirmation from a trader accepting responsibility for the ICP but it is received after an ICP has the status changed to “ready” in the registry. Audit risk rating low, no impact on settlement outcomes</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We believe that our process and respective controls are strong as we obtain authorisation from the trader prior to livening through a service request.		N/A	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue with current process and control.			