

Compliance plan for 318 Lampton Quay Ltd (TOLQ) Distributor Audit

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1) From: 01-Mar-17 To: present	15 ICPs missing their initial electrical connection dates on the registry. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they will mitigate risk most of the time. This has no direct impact on submission hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The connections in question were electrically connected many years ago as a part of customer network. From our point of view, populating electrical connection date as a date of creation of embedded network would be providing incorrect information to the registry. The issue has been referred to the Authority and we awaiting the response.			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Pending guidance from EA			

Timeliness of Provision of Initial Electrical Connection Date			
Non-compliance	Description		
Audit Ref: 3.5 With: 7(2A) of Schedule 11.1 From: 18-Oct-16 To: 26-Nov-17	Initial Electrical Connection dates were updated late for two ICPs. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate - checks are in place to monitor changes to active. This has no direct impact on submission hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The EN was created with meters installed and ICPs created for each tenant floor. Shortly thereafter the landlord asked for several floors to have the ICPs decommissioned so that the load would be recorded in the pool of common area usage under the residual ICP. Later, a new tenant moved into two of the floors and wanted to take supply from Genesis Energy. Accordingly we created the 2 new ICPs in question and advised the client and Genesis. <u>The meters/connections were electrically live throughout</u> , but we had to wait (quite some time) for the retailer to take up the ICPs and change them to Active before we knew what date to populate in the connection date so that the figure we entered was accurate (we did follow up). In this instance we were completely reliant on the retailer, hence the delay.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to monitor and follow up retailers in situations like this but remain reliant on their action.			

Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: 8 Schedule 11.1 From: 01-Jul-17 To: 13-Jul-17	5 late event updates Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong - checks are in place to monitor registry changes. This has no direct impact on submission hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The updates by TEG were done on the same day notification was received and this was the day after the retailer updated the status. The registry does not allow to decommission ICP unless a trader marks it as "ready for decommissioning". We consider it as a technical breach, outside of our control.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Distributors to Provide ICP Information to the Registry			
Non-compliance	Description		
Audit Ref: 4.6 With: 7(1)(p) of Schedule 11.1 From: 01-Mar-17 To: present	15 active ICPs with no Initial Electrical Connection dates recorded. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they will mitigate risk most of the time. This has no direct impact on submission hence the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The connections in question were electrically connected many years ago as a part of customer network. From our point of view, populating electrical connection date as a date of creation of embedded network would be providing incorrect information to the registry. The issue has been referred to the Authority and we awaiting the response.			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Pending guidance from EA			