

Compliance plan for The Embedded Network Company

Title: Timeliness of Provision of ICP Information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: Dec 2016, Feb 2017, and Jul 2017	Four late status updates for new connections. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. The risk is low as only four ICPs (1%) were affected, and the missed updates were identified and corrected through TENCO's registry discrepancy process.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action is required as lateness can't be corrected		14/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have improved our process to ensure all ICPs get updated when they are required to and this process will apply going forward.		14/02/2018	

Title: Timeliness of Provision of Initial Electrical Connection Date	
Non-compliance	Description
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: May, June, Oct and Nov 2017	Ten new connections did not have an initial energisation date populated within 10 business days of energisation. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate as they are sufficient to ensure that initial energisation dates are updated on time most of the time. Paperwork is often sent to the retailer first, then passed to TENCO, which can cause delays in updating the initial energisation date.</p> <p>The impact is low because ten ICPs were affected, and the updates were between two and 23 business days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action is required as lateness can't be corrected.		14/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TENCO are reliant on other industry participants to update registry on time. Registry updates that are backdated by other parties result in us having to backdate them for more than 3/10 business days as well.		14/02/2018	

Title: Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8</p> <p>Schedule 11.1</p> <p>From: entire audit period</p>	<p>Eight late address updates, 77 late network updates, 34 late pricing updates, and 17 late status updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, as they are sufficient to ensure updates are on time most of the time. In most cases checked, the late update was at the request of another party, or caused by another party's late registry update.</p> <p>The risk is assessed as low as a relatively small proportion of updates were affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action is required as lateness can't be corrected.		14/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

TENCO are reliant on other industry participants to update registry on time. Registry updates that are backdated by other parties lead to us having to backdate them for more than 3/10 business days as well.	14/02/2018	
--	------------	--

Title: Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)</p> <p>Schedule 11.1</p> <p>From: 19-Apr-17</p> <p>To: 26-Apr-17</p>	<p>The initial energisation date for 0000008104TC19A was incorrect, but has now been updated.</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>Controls are rated as moderate as they are sufficient to mitigate the risk of errors most of the time.</p> <p>The audit risk rating is low, as only one ICP was affected and the date has now been corrected on the registry.</p>	
Actions taken to resolve the issue		Completion date
As noted above, it has now been corrected. This was caused by Vircom closing the job with wrong details, details for another apartment. This has then been corrected but we haven't been updated.		14/2/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We have improved our process for checking the registry records and this will pick up the future		14/02/2018

Title: Notice of supporting embedded network NSP information		
Non-compliance	Description	
<p>Audit Ref: 6.4 With: Clause 26(4) Schedule 11.1</p> <p>From: Aug to Nov 2016</p>	<p>An LE ICP number was not provided at least one month before network creation for TDS0011 and TGR0011.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong, because if other participants complied with the timeframes to create ICPs they would be sufficient to ensure that the LE ICP is provided on time.</p> <p>The impact is low because the LE ICP was provided before network creation, and all other required information was provided on time.</p>	
Actions taken to resolve the issue		Completion date
No action is required as lateness can't be resolved.		15/02/2018
Preventative actions taken to ensure no further issues will occur		Completion date
TENCO are reliant on other industry participants to follow the code. We do proactively chase Local Networks for LE ICPs but often they do not issue an LE ICPs to us within 3 days. We will update our process to request those ICPs earlier as to allow for the delays.		15/02/2018
Remedial action status		
Identified		

Title: Responsibility for metering information when creating an NSP that is not a POC to the grid	
Non-compliance	Description
<p>Audit Ref: 6.9 With: Clause 10.25(2)</p> <p>From: 13-May-17 To: 01-Jul-17</p>	<p>The Reconciliation Manager received late notification of meter certification details for TAA0011 and TCB0011.</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>The controls are currently rated as moderate, but the process improvements implemented in November 2017 will increase the rating to strong.</p> <p>The audit risk rating is low, because the meters were certified at all times.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action is required as lateness can't be resolved.		14/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TENCO is reliant on other industry participants to comply with the code. We have improved our process for requesting MEP updates that will reduce chances of this non-compliance occurring in the future.		14/02/2018	