

Compliance plan for EDC Holdings Limited

Title: Timeliness of Provision of Initial Electrical Connection Date			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 01-Mar-17</p> <p>To: 17-May-17</p>	<p>37 new connections did not have an initial energisation date populated within 10 business days of energisation.</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 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 all initial energisation dates were updated within 20 business days of connection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action is required as lateness can't be resolved. We have followed up with Genesis Energy within the 10 business days from the meter installs and they haven't been able to provide paperwork within 10 business days of the connection.		28/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will start following up with Energy Retailers from day one of the network so they have time to follow up with MEP, receive paperwork and process it in the registry.		28/02/2018	

Title: Changes to registry information			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Sep-16 To: 28-Sep-16	Five late status updates. Potential impact: Low Actual impact: Low Audit history: Twice 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. In all cases, the late update was caused by the building owner's request to keep the connection in case a new tenant moved in. The risk is low as a small number of ICPs are affected, and the registry was updated very soon after TENCO confirmed that the ICPs should be decommissioned.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action is required as lateness can't be resolved. The connection for those ICPs have been delayed multiple times and TENCO have been checking on those if they were still required.		28/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No ICPs will be issued for connections that don't need to be livened in the near future.		28/02/2018	

Title: ICP location address	
Non-compliance	Description
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 24-Apr-17 To: 09-Nov-17	The list file showed eight duplicate addresses, which have now been corrected to be unique. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, as they are sufficient to ensure addresses are unique most of the time. The duplicate addresses were entered at the retailer's request.</p> <p>The risk is low as a small number of ICPs are affected, and the registry has been updated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This matter has been raised prior to audit and was supposed to be resolved prior to audit, but Genesis Energy took awhile to investigate and advise the correct addresses.		28/02/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The process for checking duplicate addresses is in place and this was supposed to be resolved prior to audit.		28/02/2018	

Title: Notice of supporting embedded network NSP information			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 26(4)</p> <p>Schedule 11.1</p> <p>From: 01-Nov-16</p> <p>To: 02-Nov-16</p>	<p>An LE ICP number was not provided at least one month before network creation for NSP EHS0011.</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	Remedial action status
ICP was provided to RM 27 days prior to livening of the network. This clause hasn't been previously audited.		28/02/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We now have the process in place to make sure ICPs are provided to RM one month in advance.	28/02/2018	