## Compliance plan for Westpower

| Non-compliance  | Description  |                    |                           |
|---|--|--------------------|---------------------------|
| Audit Ref: 2.1<br>With: 11.2(1)                                   | For 80 ICPs the address recorded in the registry does not allow them to be readily located.  |                    |                           |
|   | Potential impact: Low  |                    |                           |
| From: 01-Sep-17<br>To: 31-Jul-18                                  | Actual impact: Low   |                    |                           |
|   | Audit history: Once previously   |                    |                           |
|   | Controls: Strong   |                    |                           |
|   | Breach risk rating: 1  |                    |                           |
| Audit risk rating   | Rationale for audit risk rating  |                    |                           |
| Low   | Controls are recorded as strong. Westpower closely monitors information recorded in the registry. There is on-going project to correct address information in the registry. Impact on settlement outcomes is minor; audit risk rating is low |                    |                           |
| Actions taken to resolve the issue                                |  | Completion<br>date | Remedial action<br>status |
| We have an on-going project to add identifiers to addresses.      |  | 30 June 2019       | Identified                |
| Preventative actions taken to ensure no further issues will occur |  | Completion<br>date |                           |
| All new ICPs are given address identifiers.                       |  | Oct 2018           |                           |

| Non-compliance  | Description  |                    |                           |
|---|--|--------------------|---------------------------|
| Audit Ref: 3.5<br>With: 7(2A) of  | Initial Electrical Connection Date for 0000878611WP606 was uploaded to the registry after 44BD.  |                    |                           |
| Schedule 11.1   | Potential impact: Low  |                    |                           |
|   | Actual impact: Low   |                    |                           |
| From: 06-Dec-17   | Audit history: None  |                    |                           |
| To: 14-Feb-18   | Controls: Strong   |                    |                           |
|   | Breach risk rating: 1  |                    |                           |
| Audit risk rating   | Rationale for audit risk rating  |                    |                           |
| Low   | Controls are recorded as strong. Westpower has full control of the process of electrically connecting new installations. Late paperwork was sent to the office for one ICP. Audit risk rating is recorded as low because there was no impact on settlement outcomes. |                    |                           |
| Actions taken to resolve the issue  |  | Completion<br>date | Remedial action<br>status |
| Westpower Standards outline paperwork timeframes for<br>Contractors and we are currently implementing a new<br>process to ensure timeliness of delivery.  |  | 31/12/18           | Identified                |
| Preventative actions taken to ensure no further issues will occur   |  | Completion<br>date |                           |
| We have recently implemented KPIs in our Maximo system<br>to monitor the delivery of paperwork and our new<br>connection process, which has a workflow, will ensure that<br>timeframes are met. |  | 31/12/18           |                           |

| Non-compliance   | Description   |                    |                           |  |
|--|---|--------------------|---------------------------|--|
| Audit Ref: 4.1   | A very small number of updates of pricing and network updates   |                    |                           |  |
| With: 8 of schedule  | Potential impact: Low   |                    |                           |  |
| 11.1   | Actual impact: Low  |                    |                           |  |
|  | Audit history: Multiple times   |                    |                           |  |
| From: 01-Sep-17  | Controls: Strong  |                    |                           |  |
| To: 31-Jul-18  | Breach risk rating: 1   |                    |                           |  |
| Audit risk rating  | Rationale for audit risk rating   |                    |                           |  |
| Low  | Controls are recorded as strong. A very small number of uploads to the registry later than 3 business days; it is caused by delayed paperwork from the field. There is no impact on settlement outcome; audit risk rating low |                    |                           |  |
| Actions taken to resolve the issue   |   | Completion<br>date | Remedial action<br>status |  |
| Westpower Standards outline paperwork timeframes for<br>Contractors and we are currently implementing a new<br>process to ensure timeliness of delivery.   |   | 31/12/18           | Identified                |  |
| Preventative actions taken to ensure no further issues will occur  |   | Completion<br>date |                           |  |
| Previous pricing delays have been related to<br>upgrades/downgrades of connections where paperwork has<br>not been handed in straight away. Our new connection<br>process, which has a workflow, will ensure that timeframes<br>are met. |   | 31/12/18           |                           |  |

| Non-compliance   | Description  |                    |                           |  |
|--|--|--------------------|---------------------------|--|
| Audit Ref: 4.4   | Addresses for 80 ICPs does not allow them to be readily allocated  |                    |                           |  |
| With: 2 of schedule  | Potential impact: Low  |                    |                           |  |
| 11.1   | Actual impact: Low   |                    |                           |  |
|  | Audit history: Multiple  |                    |                           |  |
| From: 01-Sep-17  | Controls: Moderate   |                    |                           |  |
| To: 31-Jul-18  | Breach risk rating: 2  |                    |                           |  |
| Audit risk rating  | Rationale for audit risk rating  |                    |                           |  |
| Low  | Controls are recorded as moderate. For any new connection, the address is<br>now positively identified prior to entry into the system. Only addresses for<br>ICPs created in the past still need to be identifiable. It is 0.6% of active ICPs.<br>Audit risk rating is recorded as low; no impact on settlement outcome |                    |                           |  |
| Actions taken to resolve the issue                                 |  | Completion<br>date | Remedial action<br>status |  |
| We have an on-going project to update addresses.                   |  | 30/06/19           | Identified                |  |
| Preventative actions taken to ensure no further issues will occur  |  | Completion<br>date |                           |  |
| Accurate addresses with identifiers are uploaded for all new ICPs. |  |                    |                           |  |