

## Compliance plan for Nulite DUML – 2019

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11(1) of Schedule 15.3  From: 01-Jun-17 To: 30-Apr-19	Additional lights found in the field resulting in an estimated annual under submission of 33,518.8 kWh.  Potential impact: High  Actual impact: Medium  Audit history: Twice previously  Controls: Weak  Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	The controls in place are rated as weak as the database is not being maintained as expected.  The impact is assessed to be medium, based on the kWh differences detailed in <b>section 3.1</b> .	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>Response:</b> Non compliance accepted and remedial action on-going.  <b>Action:</b> Mercury will update the information to ensure they are reported correctly. It is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts.	July 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps.</p> <ul style="list-style-type: none"><li>• The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations.</li><li>• Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP.</li><li>• We are taking feedback onboard with regard to tracking changes and who made the change on the databases.</li><li>• Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.</li></ul>	On going	
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Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	No lamp descriptions recorded only a total wattage is recorded. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be low as the volume of lights associated with this database are small.	
Actions taken to resolve the issue		Completion date
<b>Response:</b> Non compliance accepted and remedial action on-going. <b>Action:</b> Mercury will liaise with Nulite to ensure information is updated correctly.		July 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Mercury will liaise with Nulite to ensure information is updated correctly and in timely manner.		On going
<b>Remedial action status</b>		
Identified		

All load recorded in the database			
Non-compliance	Description		
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	27 additional lights found in the field. Potential impact: High Actual impact: Medium Audit history: Twice previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	The controls in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be medium, based on the kWh differences detailed in section 3.1.		
Actions taken to resolve the issue		Completion date	Remedial action status
<b>Response:</b> Non compliance accepted and remedial action on-going. <b>Action:</b> Mercury will liaise with Nulite to ensure information is updated correctly.		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> <li>The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations.</li> <li>Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP.</li> <li>We are taking feedback onboard with regard to tracking changes and who made the change on the databases.</li> </ul> Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.		On going	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: 11.4 of Schedule 15.3 From: 01-Jun-18 To: 30-Apr-19	The audit trail does not include the details of the person making the change in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as weak as changes made in the database do not require the persons details making the change to be recorded as it is an excel spreadsheet. The impact is assessed to be low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>Response:</b> Non compliance accepted and remedial action on-going. <b>Action:</b> Mercury will liaise with Nulite to ensure information is updated correctly to include person making the change.	July 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> <li>The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations.</li> <li>Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP.</li> <li>We are taking feedback onboard with regard to tracking changes and who made the change on the databases.</li> </ul> Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.	On going	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: 15.2 and 15.37B(b)  From: 01-Jun-17 To: 30-Apr-19	The field audit found 27 additional lights resulting in a potential under submission of 33,518.8 kWh per annum.  Potential impact: High Actual impact: Medium Audit history: Twice previously Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	The controls in place are rated as weak as the database is not being maintained as expected.  The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue		Completion date
<b>Response:</b> Non compliance accepted and remedial action on-going.  <b>Action:</b> Mercury will update the information to ensure they are reported correctly. It is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts.		July 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Our current process is the responsibility on the customer to update mercury of any changes, this process is clearly not working so we are going to move forward with the following steps. <ul style="list-style-type: none"> <li>• The 'current' database will be sent to each account holder with an email detailing the auditor's findings and request information relating to lamp types, street numbers, additions fittings, etc. We will request a returned completed database within one month of the email date. If not we will raise field investigations.</li> <li>• Every two months we will send the 'current' database to the customer requesting it be updated with any changes which we will then reflect in SAP.</li> <li>• We are taking feedback onboard with regard to tracking changes and who made the change on the databases.</li> </ul> Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.		On going

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: 15.2 and 15.37B(c)</p> <p>From: 01-Jun-17</p> <p>To: 30-Apr-19</p>	<p>Under submission of 2,384.68 kWh across May and June 2017 due to the ICPs being recorded as decommissioned on the registry.</p> <p>Additional lights found in the field resulting in an estimated annual under submission of 33,518.8 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls in place are rated as weak as the database is not being maintained as expected.</p> <p>The impact is assessed to be medium, based on the kWh differences detailed in <b>section 3.1</b>.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>Response:</b> Non compliance accepted and remedial action on-going.</p> <p><b>Action:</b> Mercury will update the information to ensure they are reported correctly. It is rather impossible to backdate as no one knows when the changes were made as it was not captured. Back dating on 'potential' under submission may cause over submission without the known facts.</p>	July 2019	Identified
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