

## Compliance plan for Acacia Cove Retirement Village 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	Estimated under submission of 10,549 kWh due to: <ul style="list-style-type: none"> <li>load being excluded from the spreadsheet; and</li> <li>additional lights found in the field.</li> </ul> Potential impact: Medium  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 overall kWh differences described above.	
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.	On going	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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Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3 With: 11(2)(b) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	41 items of load with insufficient location details. Potential impact: Low Actual impact: Low Audit history: Once previously 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. These items are excluded from submission. The volume associated with these lights is small therefore the audit risk rating is low.		
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.		On going	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> <li>Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.</li> </ul>		On going	

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: 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 in place are rated as weak as the database is not being maintained as expected. The impact is assessed to be low as the impact on reconciliation is small as 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.		On going	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> <li>• Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.</li> </ul>		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 update the information to comply with the code.	On going	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> <li>Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.</li> </ul>	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 7,346 kWh per annum.  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 in place are rated as weak as the database is not being maintained as expected.  The impact is assessed to be low, based on the kWh differences described above.	
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.	On-going	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> <li>• Our intention is to have a consistent format across all databases where possible, to avoid error and confusion.</li> </ul>	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>Estimated under submission of 10,549 kWh due to:</p> <ul style="list-style-type: none"> <li>load being excluded from the spreadsheet; and</li> <li>additional lights found in the field</li> </ul> <p>Potential impact: Medium</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>Medium</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 overall kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>Response:</b></p> <p>Non compliance accepted and remedial action on-going.</p> <p><b>Action:</b></p> <p>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>		On-going	Identified
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