Compliance plan for Avondale Business Association DUML – 2019

| Deriving submission information | | | |
|---|---|-----------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 2.1 With: 11(1) of Schedule 15.3 | Additional lights found in the field resulting in an estimated annual under submission of 4,310 kWh. Potential impact: Low Actual impact: Low Audit history: Twice previously | | |
| From: 01-Jun-17 | Controls: Weak | | |
| To: 30-Apr-19 | Breach risk rating: 3 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | 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 overall kWh differences described above. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Response: Non compliance accepted and remedial action on-going. Action: Mercury will update the information to ensure they are reported correctly. | | July 2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |

On going 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. 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. 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. We are taking feedback onboard with regard to tracking changes and who made the change on the databases. Our intention is to have a consistent format across all databases where possible, to avoid error and

confusion.

| All load recorded in the | All load recorded in the database | | | | |
|--|--|--|------------------------|--|--|
| Non-compliance | Description | | | | |
| Audit Ref: 2.5 | 21 additional lights found in the field. | | | | |
| With: 11(2A) of | Potential impact: Low | | | | |
| Schedule 15.3 | Actual impact: Low | | | | |
| | Audit history: None | | | | |
| From: 01-Jun-17 | Controls: Weak | | | | |
| To: 30-Apr-19 | Breach risk rating: 3 | | | | |
| Audit risk rating | Rationale fo | r audit risk rating | | | |
| Low | The controls in place are rated as weak as the database is not being main as expected. | | | | |
| | The impact is assessed to be low as th detailed in section 3.1 . | assessed to be low as the impact on reconciliation is small as tion 3.1 . | | | |
| Actions ta | ken to resolve the issue | Completion date | Remedial action status | | |
| Response: Non compliance accepted and remedial action on-going. Action: 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 | | | |
| 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. • 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. • 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. • We are taking feedback onboard with regard to tracking changes and who made the change on the databases. • 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 | The field audit found 21 additional lights resulting in a potential unde submission of 4,309 kWh per annum. | | | |
| 15.37B(b) | Potential impact: Low | | | |
| | Actual impact: Low | | | |
| | Audit history: None | | | |
| From: 01-Jun-17 | Controls: Weak | | | |
| To: 30-Apr-19 | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | The controls in place are rated as weak as the database is not being mai as expected. | | | |
| | The impact is assessed to be low, based on the kWh differences described above. | | | |
| Actions tal | ken to resolve the issue | Completion date | Remedial action status | |
| Response: Non compliance accepted and remedial action on-going. Action: 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 | |
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| Volume information acc | uracy | | | |
|---|--|--|------------------------|--|
| Non-compliance | Des | cription | | |
| Audit Ref: 3.2 With: 15.2 and | Additional lights found in the field resulting in an estimated annual under submission of 4,310 kWh. | | | |
| 15.37B(c) | Potential impact: Low | | | |
| | Actual impact: Low | | | |
| | Audit history: Twice previously | | | |
| From: 01-Jun-17 | Controls: Weak | | | |
| To: 30-Apr-19 | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | The controls in place are rated as weak a expected. | ols in place are rated as weak as the database is not being maintained a | | |
| | The impact is assessed to be low, based on the overall kWh differences described above. | | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| Response: Non compliance accepted and remedial action on-going. | | July 2019 | Identified | |
| Action: | | | | |
| correctly. It is rather imp | information to ensure they are reported ossible to backdate as no one knows made as it was not captured. Back dating mission may cause over submission | | | |
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