

## Compliance plan for Nova ATH – 2019

Use of Contractors		
Non-compliance	Description	
Audit Ref: 2.1 With: 10.3 of Part 10 From: 01-Jan-18 To: 03-Jun-19	Contractor audit regime policy not followed for approx. 18 months. Potential impact: Medium 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 recorded as weak because without audits being conducted risks will not be mitigated. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
ATH to complete these		End of 2019
Preventative actions taken to ensure no further issues will occur		Completion date
New validation staff hired, and policy being followed		End of July
		Identified

Determine Metering Component Error and Record		
Non-compliance	Description	
Audit Ref: 5.61 With: Clause 7(5) Of Schedule 10.4  From: 01-Jun-16 To: 05-Jun-19	Nova has not confirmed that the measurement uncertainty does not exceed one third of the maximum permitted error when calibrating meters. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There is currently no process in place to record uncertainty on calibration reports. The impact on settlement is likely to be minor because the overall error measured and recorded was well below the maximum allowed.	
Actions taken to resolve the issue		Completion date
Nova ATH to develop and research process and procedure with MSL		June 2020
Preventative actions taken to ensure no further issues will occur		Completion date
As above		June 2020
		Identified

Class B ATH Calibrating Metering Components		
Non-compliance	Description	
Audit Ref: 5.62 With: Clause 16A.20 From: 01-Jun-16 To: 05-Jun-19	Measurement uncertainty not recorded on meter calibration report. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	There is currently no process in place to record uncertainty on calibration reports. The impact on settlement is likely to be minor because the overall error measured and recorded was well below the maximum allowed.	
Actions taken to resolve the issue		Completion date
Nova ATH to develop and research process and procedure with MSL		June 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Nova ATH to develop and research process and procedure with MSL		June 2020
		Identified