

## Compliance plan for Stack Energy - 2019

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 From: 01-Jun-19 To: 30-Nov-19	Incorrect information provided in small number CS files Potential impact: Low Actual impact: Low Audit history: Once before Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate. More detective work needs to be done. The audit risk rating is recorded as low because of the small number of residential ICPs traded.		
Actions taken to resolve the issue		Completion date	Remedial action status
Make a proper document which everyone can follow the switching process manually before making automation system. System will be established within early 2020.		06/12/19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Build automation switching system which follows every single switching rules within early 2020.		30/04/2020	

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1  From: 01-Jun-19 To: 30-Nov-19	One update of the "active" status later than 5 business days Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as strong. One ICP status was updated later than 5 BD, it was over looked. Submission volumes were correct. There was no impact on settlement because it was only one ICP. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Share and educate ICP status changes rule with employee who are related. Automation system will be established within early 2020.		06/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Build our automation system which strictly follow the ICP status rules. Bring any status changes into our management web portal site so that everyone can check a remaining date of changing status		30/04/2020	

Non-compliance	Description	
Audit Ref: 4.3 With: 5 of Schedule 11.3  From: 01-Jun-19 To: 30-Nov-19	Average daily consumption methodology is incorrect. Incorrect switch event date for two ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate; more care must be taken when creating the CS file using the registry interface. The audit risk rating is low because the number of switches affected was low. It has no impact on settlement	
Actions taken to resolve the issue	Completion date	Remedial action status
Confirmed that the latest two Actual meter readings are going to be calculated as average daily consumption. Make a document and share and educate to staff who are related	06/12/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Confirmed that the latest two Actual meter readings are going to be calculated as average daily consumption. Make a document and share and educate to staff who are related	06/12/2019	

Non-compliance	Description	
Audit Ref: 4.10 With: 11 of Schedule 11.3  From: 01-Jun-19 To: 30-Nov-19	Average daily consumption methodology is incorrect. Incorrect switch event date for 3 ICPs Potential impact: Low Actual impact: Low Audit history: once before Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate; this is the second audit which identifies a problem with the CS files. The audit risk rating is low because the number of switches affected was low. It has no impact on settlement	
Actions taken to resolve the issue	Completion date	Remedial action status
Confirmed that the latest two Actual meter readings are going to be calculated as average daily consumption. Make a document and share and educate to staff who are related	06/12/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Confirmed that the latest two Actual meter readings are going to be calculated as average daily consumption. Make a document and share and educate to staff who are related	06/12/2019	

Non-compliance	Description		
Audit Ref: 6.9 With: Audit Ref: 8(1) of Schedule 15.2 From: 01-Jun-19 To: 30-Nov-19	The read attainment was not met for one ICP Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate. Non-AMI meters are not read frequently enough. No impact on settlement outcomes. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
There was one ICP (commercial area) meter location was not able to find it. Confirmed the location and building manager that allow us to read and attain meter reading on Nov 2019. From now on there is no other obstacle to read and register the meter reading.		06/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Confirmed the meter location and building manager that allow us to read and attain meter reading on Nov 2019. From now on there is no other obstacle to read and register the meter reading.		06/12/2019	

Non-compliance	Description		
Audit Ref: 6.10 With: Audit Ref: 9(1) of Schedule 15.2 From: 01-Jun-19 To: 23-Nov-19	The read attainment was not met for 1 NSP Potential impact: None Actual impact: None Audit history: once before Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate, there is a problem with non-AMI reads done by the company themselves. No impact on settlement outcomes. Audit risk rating is low. No impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
There was one ICP (commercial area) meter location was not able to find it. Confirmed the location and building manager that allow us to read and attain meter reading on Nov 2019. From now on there is no other obstacle to read and register the meter reading.		06/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Confirmed the location and building manager that allow us to read and attain meter reading on Nov 2019. From now on there is no other obstacle to read and register the meter reading.		06/12/2019	

Non-compliance	Description	
Audit Ref: 9.6 With: 17 of Schedule 15.2  From: 01-Jun-19 To: 30-Nov-19	Log files from NGCM are not reviewed as a part of the validation process because NGCM does not provide them  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate because there are some improvements that can be made to them. There was minor impact on settlement because of the small number of ICPs. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Once we receive meter reading data which is abnormal (much higher than average consumption and updating a reading value with error code from MEPs) conditions our system will notice to staff who is involved. We will carry out meter reading validation manually once we receive the notification.	31/12/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Create condition that once we receive meter reading data which is abnormal (much higher than average consumption and updating a reading value with error code from MEPs) condition our system will notice to staff who is involved. We will carry out meter reading validation manually once we receive the notification.	31/12/2019	

Non-compliance	Description		
Audit Ref: 13.3 With: 10 of Schedule 15.3  From: 01-Jun-18 To: 30-Nov-19	Historical Estimate targets not met for revision 3, 7 for a few months Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only one NSP and the number of traded ICPs is small. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Number of trading ICP is currently low so if there is missing one reading it will be missing of over 25% of portion from one NSP. We will reduce a period of gaining meter reading for non-AMI meter.		10/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Number of trading ICP is currently low so if there is missing one reading it will be missing of over 25% of portion from one NSP. We will reduce a period of gaining meter reading for non-AMI meter.		10/12/2019	