

Compliance plan for Lighthouse Energy 2020

Non-compliance	Description		
Audit Ref: 1.11 With: 15.37A From: 11-Mar-20 To: 30-Apr-20	Audit conducted late Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The audit risk rating is recorded as low because the number of ICPs traded by Lighthouse Energy is small therefore any impact to the market will be minor		
Actions taken to resolve the issue		Completion date	Remedial action status
This was caused in part by our system corruption. We were focused on restoring our data and unfortunately missed this.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our systems have been hardened and we have implemented more robust backups to prevent this.		-24/04/2020	

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 From: 01-Nov-18 To: 15-Apr-20	Relatively low number of information inaccuracies identified during the audit Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. More strict processes to monitor new ICPs information such as type of metering and ANZSIC code. There was minor impact on settlement. Audit risk rating low		
Actions taken to resolve the issue		Completion date	Remedial action status
We have reviewed our processes and will be changing our procedures. We have also increased our team size so that our admin has better task delineation.		1/04/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
From now on we will be checking and updating ANZSIC codes, metering types and monitoring breach reports regularly.		30/04/2020	

Non-compliance	Description
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Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Nov-18 To: 15-Apr-20	Backdated transactions in the registry Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement to update registry in timely manner. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
We have discussed this within team and process reviewed			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
From now on using switch breach report regularly to check		30/04/2020	

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 01-Nov-18 To: 15-Apr-20	Incorrect ANZSIC code for 4 ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. The company needs to refine their process of checking the validity of ANZSIC code when ICP switches in. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
Discussed with team, taken on new team, process reviewed			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be checking ANSIC codes on switch in			

Non-compliance	Description		
Audit Ref: 4.2 With: 3 & 4(1)(a) of Schedule 11.3 From: 04-Oct-19 To: 31-Mar-20	Incorrect proposed event date for 3 ICPs; 7 AN files late Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. The company needs to follow their documented processes. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
Discussed with team and reviewed processes			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be regularly monitoring Switch Breach reports		30/04/2020	

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 04-Nov-19 To: 16-Dec-19	3 CS files late; average daily consumption methodology is incorrect Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement., using a Switch Breach report on daily basis should help. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		

Actions taken to resolve the issue	Completion date	Remedial action status
Discussed with team and reviewed processes		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be changing calculation methodology	30/04/2020	

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 19-Nov-19 To: 24-Mar-20	Incorrect proposed event date for 3 ICPs; 12 AN files late; daily kWh consumption is incorrect Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
Discussed with team and reviewed processes			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be regularly monitoring Switch Breach reports and changing read calculation methodologies.		30/04/2020	

Non-compliance	Description		
Audit Ref: 4.9 With: 10(2) of Schedule 11.3 From: 22-Jan-20 To: 16-Mar-20	2 CS files sent later than 10 BD Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. Using daily a Switch Breach report should be of great assistance. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
More training will be given to staff			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be regularly monitoring Switch Breach reports.		30/04/2020	

Non-compliance	Description		
Audit Ref: 4.15 With: 18 of Schedule 11.3 From: 12-Sep-19 To: 02-Mar-20	13 AW files were sent later than 5 business days Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		

Actions taken to resolve the issue	Completion date	Remedial action status
Have discussed with team, taken on new team, process reviewed		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
From now on using switch breach report	30/04/2020	

Non-compliance	Description		
Audit Ref: 6.10 With: Audit Ref: 9(1) of Schedule 15.2 From: 01-Jan-20 To: 31-Mar-20	The read attainment was not met for 3 months Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, there is a problem with non-AMI reads as there are no reading arrangements. Audit risk rating is low. Minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was in part affected by our systems outage. We have also reviewed our systems and will make alterations			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Team will ask for reads in events where meters are not compliant and cannot be swapped out in a timely manner		30/04	

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7 From: 01-Nov-18 To: 15-Apr-20	Energy supplied is currently calculated by JC Consulting from the previous months Initial Network volumes Potential impact: None Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because data is not coming from a billing system, however volumes submitted to networks are very accurate based on meter readings. There is no impact on settlement outcomes. Audit risk low.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Nov-18 To: 15-Apr-20	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Lighthouse Energy submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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