

## Compliance plan for WBOPDC GENE DUML – 2019

| Deriving submission information  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 2.1<br/>Clause 11(1) of Schedule 15.3</p> <p>From: 01-Apr-19<br/>To: 27-Nov-19</p> | <p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 2,450 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p> <p>In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.</p> <p>Potential impact: Low<br/>Actual impact: Low<br/>Audit history: Once<br/>Controls: Weak<br/>Breach risk rating: 3</p> |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | <p>The controls are rated as weak as the RAMM database is not used for reconciliation and new lights are not added within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>   |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| Introduce the monthly reporting as the source for settlements.                                   | 01/03/2020  | Identified             |
| Preventative actions taken to ensure no further issues will occur                                | Completion date   |                        |
| Review the monthly report for accuracy   | 01/03/2020  |                        |

| All load recorded in database  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| Audit Ref: 2.5<br>With: Clause 11(2A) of Schedule 15.3<br>From: 01-Apr-19<br>To: 27-Nov-19   | Four lights not recorded in the database.<br>Potential impact: Medium<br>Actual impact: Low<br>Audit history: Once<br>Controls: Weak<br>Breach risk rating: 3         |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | The controls are rated as weak as new lights are not added to the database as required by the code.<br>The impact is low as the volume of lights identified is small. |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| Genesis Continue to work with WBoP, however the process to vest assets is a matter of discussion as to whether this will change or not.<br>Genesis will request WBoP to review and make the necessary correction to update their database. |   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| Genesis needs to review the data being provided for accuracy.  | 01/03/2020  |                        |

| Database accuracy   |   |                 |                 |
|---|---|-----------------|-----------------|
| Non-compliance  | Description   |                 |                 |
| <p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Apr-19</p> <p>To: 27-Nov-19</p>  | <p>New lights are not added to the database for reconciliation in the month they are electrically connected.</p> <p>In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p> |                 |                 |
| Audit risk rating   | Rationale for audit risk rating   |                 |                 |
| <b>Low</b>  | <p>The controls are rated as weak as new lights are not added to RAMM within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>  |                 |                 |
| Actions taken to resolve the issue  |   | Completion date |                 |
| <p>Genesis Continue to work with WBoP, however the process to vest assets is a matter of discussion as to whether this will change or not.</p> <p>Genesis will request WBoP to review and make the necessary correction to update their database.</p> |   | Identified      |                 |
| Preventative actions taken to ensure no further issues will occur   |   |                 | Completion date |
| Genesis needs to review the data being provided for accuracy.   |   |                 | 01/03/2020      |

| Volume information accuracy  |   |                 |                        |
|--|---|-----------------|------------------------|
| Non-compliance   | Description   |                 |                        |
| <p>Audit Ref: 3.2</p> <p>Clause 15.2 and 15.37B(c)</p> <p>From: 01-Apr-19</p> <p>To: 27-Nov-19</p> | <p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 2,450 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p> <p>In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p> |                 |                        |
| Audit risk rating  | Rationale for audit risk rating   |                 |                        |
| <b>Low</b>   | <p>The controls are rated as weak as the RAMM database is not used for reconciliation and new lights are not added within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>   |                 |                        |
| Actions taken to resolve the issue   |   | Completion date | Remedial action status |
| Introduce the monthly reporting as the source for settlements.                                     |   | 01/03/2020      | Identified             |
| Preventative actions taken to ensure no further issues will occur                                  |   | Completion date |                        |
| Review the monthly report for accuracy   |   | 01/03/2020      |                        |