

## Compliance Plan for Far North Holdings DUML – 2020

<b>Distributed unmetered load audits</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 1.10 With: Clause 16A(1)(b) of Part 16A & 17.295F From: 01-Jun-18 To: 08-Apr-20	Audit not completed within the required timeframe. Audit not completed by 1 June 2018 for ICP 0000910450TE75D. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong, as Contact are reliant on the database provider to supply the data and in this case their delay caused this report to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The two issues identified in this non compliance are largely outside of Contact control. ICP 0000910450TE75D is vacant (we have made multiple attempts to get this customer to sign into this ICP since 2013 without success) in CTCT systems so there was no ability to engage with customer / DUML Database owner. Additionally it was not possible to disconnect this load either from a logistic perspective (46 individual disconnections) or a safety perspective. We believe that the primary responsibility or this non compliance was with the trader for Far North Holdings in 2014 for failing to switch this ICP or include it as part of DUML database audits upto when the customer switched back to Contact in 2019.	April 2020	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
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Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 24-May-17</p> <p>To: 05-Mar-20</p>	<p>The TOPE excel spreadsheet was 54.14% of the submission information indicating an estimated over submission of 13,290 kWh per annum.</p> <p>The TOPE excel spreadsheet data was 88.9% of the field data indicating under submission of 1,964.66 kWh per annum.</p> <p>The registry figures are used for submission and this does not track load on a daily basis.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as weak as a database is not used for submission.</p> <p>The risk is medium due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact has provided an update of the light details and associated load to TOPE to enable a more accurate assessment of unmetered consumption while we continue to try and engage with the customer in order to address these non compliance issues.</p> <p>We are looking at a number of potential options such as:</p> <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML.</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove audit requirement.</li> </ul>	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3  From: 01-May-18 To: 05-Mar-20	3 x no input wattage recorded  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Weak  Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as weak as the TOPE excel spreadsheet has a high level of inaccuracy indicating controls are weak.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact has provided an update of the light details and associated load to TOPE to enable a more accurate assessment of unmetered consumption while we continue to try and engage with the customer in order to address these non compliance issues.  We are looking at a number of potential options such as: <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML.</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove the DUML audit requirement</li> </ul>	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 24-May-17 To: 05-Mar-20	21 items of load not recorded in the TOPE excel spreadsheet. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as weak as the TOPE excel spreadsheet has not been updated to reflect the field information. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact has provided an update of the light details and associated load to TOPE to enable a more accurate assessment of unmetered consumption while we continue to try and engage with the customer in order to address these non compliance issues. We are looking at a number of potential options such as: <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML.</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove the DUML audit requirement</li> </ul>	On -going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: 24-May-17 To: 05-Mar-20	Tracking of load change not carried out. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as none as there is no mechanism for tracking load changes. The field audit identified a high number of discrepancies indicating that the TOPE excel spreadsheet has not been kept up to date. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact is continuing to try and engage with the customer in order to address these non compliance issues. We are looking at a number of potential options such as: <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML. As part of this transition a more complete asset register will be implemented to allow tracking of load changes</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove the DUML audit requirement</li> </ul>	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 24-May-17 To: 05-Mar-20	Tracking of load change not carried out and therefore no audit trail of changes. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as none as there is no mechanism for tracking load changes. The field audit identified a high number of discrepancies indicating that the TOPE excel spreadsheet has not been kept up to date. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact is continuing to try and engage with the customer in order to address these non compliance issues. We are looking at a number of potential options such as: <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML. As part of this transition a more complete asset register will be implemented to allow tracking of load changes</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove the DUML audit requirement</li> </ul>	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 11(2A) of Schedule 15.3  From: 24-May-17 To: 05-Mar-20	The TOPE excel spreadsheet data was 88.9% of the field data indicating under submission of 1,964.66 kWh per annum.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Weak  Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as weak as the TOPE excel spreadsheet has not been updated to reflect the field information.  The risk is low due to the minimal impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact has provided an update of the light details and associated load to TOPE to enable a more accurate assessment of unmetered consumption while we continue to try and engage with the customer in order to address these non compliance issues.  We are looking at a number of potential options such as: <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML.</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove the DUML audit requirement</li> </ul>	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 24-May-17</p> <p>To: 06-Mar-20</p>	<p>The TOPE excel spreadsheet was 54.14% of the submission information indicating over submission of 13,290 kWh per annum.</p> <p>The TOPE excel spreadsheet was 88.9% of the field data indicating under submission of 1964.66 kWh per annum.</p> <p>The registry figures are used for submission and this does not track load on a daily basis.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>Controls are rated as weak as the TOPE excel spreadsheet has not been updated to reflect the field information.</p> <p>The risk is medium due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact has provided an update of the light details and associated load to TOPE to enable a more accurate assessment of unmetered consumption while we continue to try and engage with the customer in order to address these non compliance issues.</p> <p>We are looking at a number of potential options such as:</p> <ul style="list-style-type: none"> <li>Continue to try and engage with customer to transition responsibility of the database from TOPE to FNHL as FNHL have no mechanism to advise TOPE of any changes to the number or type of lights associated with this DUML. As part of this transition a more complete asset register will be implemented to allow tracking of load changes</li> <li>TOPE have assigned reference ICPs for each light within their systems for tracing purposes which would enable this unmetered load to be transitioned to standard unmetered load. We intend to investigate with both TOPE and FNHL the possibility of transitioning this DUML to standard UML therefore remove the DUML audit requirement</li> </ul>	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
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