

Compliance plan for Horizon Distributor– 2020

Complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11.2(1) From: 01-Sep-19 To: 31-Aug-20	Registry information not complete and accurate in all instances. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. Reporting is in place to identify discrepancies, but these are not always being reviewed and actioned as expected. The audit risk rating is low as the volume and impact of the discrepancies will have a minimal impact on settlement.	
Actions taken to resolve the issue		Completion date
Updates/corrections completed during audit		06/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The administration process will be improved to achieve compliance. A weekly review of any discrepancies highlighted in report, these will then be investigated and corrected.		14/10/2020
		Identified

Provision of information to the registry		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 11.7 From: 29-May-20 To: 07-Aug-20	15 initial electrical connection dates missing. 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. Reporting is in place to identify these but use of the reports appears to have lapsed since May 2020. There is no impact on settlement. The only potential impact is where a trader may wish to compare their Active date to the IECD, so the impact is considered minor, leading to an audit risk rating of low.	
Actions taken to resolve the issue		Completion date
Updates/corrections completed during audit		06/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The administration process will be improved to achieve compliance. A weekly review of any discrepancies highlighted in report, these will then be investigated and corrected.		14/10/2020
		Identified

Population of Initial Electrical Connection Date		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 7(2A) of Schedule 11.1</p> <p>From: 12-Apr-19</p> <p>To: 04-Aug-20</p>	<p>32 (16%) late initial electrical connection date updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as there are delays from the field cause Horizon to update the registry late.</p> <p>There is no impact on settlement. The only potential impact is where a trader may wish to compare their Active date to the IECD, so the impact is considered minor, leading to an audit risk rating of low.</p>	
Actions taken to resolve the issue		Completion date
Updates/corrections completed during audit		06/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The administration process will be improved to achieve compliance. A weekly review of any discrepancies highlighted in report, these will then be investigated and corrected.		14/10/2020
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 01-Sep-19 To: 31-Aug-20	Updates to registry backdated greater than 3 business days of the event. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The audit controls are rated as moderate. The lack of interface to the registry can make timeliness difficult to achieve due to the manual checks in the registry to monitor updates made by other participants and the requirement to manually change the event date can make events appear to be backdated. The audit risk rating is low as there is only a minor impact on participants with late updates.	
Actions taken to resolve the issue		Completion date
Updates/corrections completed prior or during audit		06/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The administration process of checking registry entries will be improved to achieve compliance		14/10/2020

ICP addresses		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 01-Sep-19 To: 31-Aug-20	Six active ICPs with addresses that are not readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as the reporting in place provides good visibility of this so these are addressed. The audit risk rating is low as this has a minor impact on traders because addresses are relied on for meter reading and disconnection purposes.	
Actions taken to resolve the issue		Completion date
Investigate all ICP's with missing location address and or GPS co-ordinates and add to registry		14/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The administration process of checking registry entries will be improved to ensure all new ICP have a location address or GPS co-ordinates entered into registry on livening		14/10/2020

Distributors to Provide ICP Information to the Registry manager		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(p) of Schedule 11.1</p> <p>From: 29-Nov-19</p> <p>To: 31-Aug-20</p>	<p>15 initial electrical connection dates missing.</p> <p>Five incorrect initial electrical connection dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. Reporting is in place to identify discrepancies, but reports are not always being reviewed and actioned as expected.</p> <p>The audit risk rating is low as there were only five incorrect initial electrical connection dates identified.</p>	
Actions taken to resolve the issue		Completion date
Updates/corrections completed prior or during audit		06/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
The administration process of capturing initial electrical connection date will be changed to achieve compliance. A weekly review of any discrepancies highlighted in report, these will then be investigated and corrected.		14/10/2020
		Identified