

## EA Networks Distributor Compliance Plan 2021

Timeliness of Provision of ICP Information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 01-Jun-20 To: 31-May-21	The registry was not updated prior to commencement of trading for 16 ICPs. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate overall. The general controls over new connections are strong and have improved now that paperwork is scanned and emailed, instead of hard copies being provided. The controls over ICP splits are weaker, because typically EA Networks has waited for connection paperwork to be provided before updating the ICP to "ready" on the registry. The audit risk rating is low, a small number of ICPs were affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.	August 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The process has been changed to treat ICP splits in the same manner as new connections in that Documents are scanned and emailed to improve the timeliness of updating the Registry.	August 2021	

Connection of an ICP that is not an NSP		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 01-Jun-20</p> <p>To: 31-May-21</p>	<p>ICP 0000012230EA09F did not have a trader recorded on the registry on the date it was electrically connected.</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	
<b>Low</b>	<p>Controls are rated as strong because one exception was identified, which was backdated at the trader's request.</p> <p>The audit risk rating is low because the proposed trader had requested the connection and accepted responsibility, and the registry was updated within ten business days of initial electrical connection.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.	August 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>EA Networks will advise Customers of ICP splits where the trader has not accepted responsibility for an ICP that must arrange for a New Retailer.</p> <p>It should be noted that these ICP splits were done to meet regulatory requirements and it is EA Networks experience that the issue is not generally with the trader, the issue is with the end Customer not accepting the ICP split.</p> <p>EA Networks will review each of remaining ICP Splits and work with Customers, Traders, and MEP to resolve this issue.</p>	August 2022	

Connection of an ICP that is not an NSP		
Non-compliance	Description	
Audit Ref: 3.7 With: Clause 10.317  From: 01-Jun-20 To: 31-May-21	16 ICPs connected without acceptance of the nominated trader. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as these are historical connections that are being corrected to comply with the requirement of one ICP per connection point and the process for the management of trader acceptance for new connections is strong.  The audit risk rating is low as the number of split ICPs to be made active is very small.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.	August 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Please see Preventative action for 3.6	August 2022	

Monitoring of "new" and "ready" status			
Non-compliance	Description		
Audit Ref: 3.14 With: Clause 15 Schedule 11.1 From: 01-Jun-20 To: 31-May-21	16 ICPs at "new" or "ready" status not followed up with the nominated trader. 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>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. EA Networks must follow-up with the customer, if the trader does not accept responsibility. 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
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.		August 2021	
Preventative actions taken to ensure no further issues will occur		Completion date	
EA Networks will regularly check with status of ICPs with Trader. Please see Preventative action for 3.6		August 2022	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 01-Jun-20</p> <p>To: 31-May-21</p>	<p>24 late address events.</p> <p>Two late network updates to distributed generation details.</p> <p>Seven late network updates to fields other than distributed generation details.</p> <p>23 late pricing events.</p> <p>15 late updates to decommissioned status.</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		
<b>Low</b>	<p>Controls are rated as moderate because are sufficient to ensure that the registry is updated within three business days most of the time.</p> <p>The risk rating is low because there may be a minor impact on other participants. Processing corrections improves compliance with the completeness and accuracy requirements.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.		August 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Several late updates were as result of the Business Analysis been on leave, the Commercial analysis has been trained and setup to carry out required tasks while on leave.</p> <p>Planning Engineer has setup a number template emails to ensure that Distributed generations details are passed on.</p> <p>Inspectors were reminded of their obligations on completing relevant forms in a timely manner and when the Field Services Administrator is on leave, they need to pass on Forms directly to the Commercial or Business Analysis.</p>		August 2021	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 Schedule 11.1 From: 01-Jun-20 To: 31-May-21	One ICP without a readily locatable address Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating:1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as processes are robust to ensure that addresses are locatable The impact is rated as low as only one ICP was affected.	
Actions taken to resolve the issue		Completion date
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.		August 2021
Preventative actions taken to ensure no further issues will occur		Completion date
One off issue -normally sufficient information is provided.		August 2021
Remedial action status		
Cleared		

<b>Distributors to Provide ICP Information to the Registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.6 With: Clause 7(1)(m) & (p) Schedule 11.1  From: 01-Jun-20 To: 31-May-21	Unmetered load information is not recorded on the registry for ICP 0000034224EA735. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate, overall EA Networks has robust controls. The audit risk rating is assessed to be low as the volume of ICPs affected is small	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.	August 2021	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Unmetered Load information for 0000034224EA735 has been update on the Registry.	August 2021	

Management of “ready” status			
Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: Clause 14 of schedule 11.1</p> <p>From: 01-Jun-20</p> <p>To: 31-May-21</p>	<p>16 ICPs recorded as “ready” but no acceptance has been received from the trader recorded in the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as strong as these are historical connections that are being corrected to comply with the requirement of one ICP per connection point and the process for the management of trader acceptance for new connections is strong.</p> <p>The audit risk rating is low as the number of split ICPs to be made active is very small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have undertaken a review of EA Networks processes to identify how the non-compliance occurred.		August 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As note in 3.6; EA Networks will review each of remaining ICP Splits and work with Customers, Traders, and MEP to resolve this issue.		August 2022	