

## Compliance plan for Genesis Energy Reconciliation Participant audit -2022

| Relevant information  |   |
|---|---|
| Non-compliance  | Description   |
| Audit Ref: 2.1<br>With: Clause 15.2<br><br>From: 01-Jul-21<br>To: 31-Jan-22 | Some inaccurate data is recorded and was not updated as soon as practicable.<br>Potential impact: High<br>Actual impact: High<br>Audit history: Multiple times<br>Controls: Moderate<br>Breach risk rating: 6   |
| Audit risk rating   | Rationale for audit risk rating   |
| <b>High</b>   | The controls are recorded as moderate overall but there is room for improvement identified. Some of these issues have been present for at least the last two audits and these need to be addressed before the controls could be rated as strong overall.<br><br>The impact is assessed to be high based on kWh impacts to the market for volumes not reconciled within 14 months and incorrect data sent to other traders as part of the switching process. |

| Actions taken to resolve the issue  | Completion date   | Remedial action status |
|---|---|------------------------|
| <p><b>Bridged Meters</b> – We have implemented a report that picks up any meters that have potentially been bridged and these are worked daily. We also advise the MEP of these separate to the W/O being raised. We have also initiated a daily report to pick up sites that have zero consumption which is an additional control to pick up meters that may have been bridged. When a meter is unbridged the missing consumption is calculated, and the information sent to our Marker Settlements team to ensure the submissions are corrected. We will look to conduct an internal audit to ensure these processes are being followed</p> <p><b>NHH Vacant / Inactive consumption corrections-</b> A new report has been created to pick up any inactive and vacant sites that are consuming energy. When these are worked the ICP is made active from the date that consumption restarted. Based on this audit we will be looking at potential improvement to the report / process</p> <p><b>Defective meters</b> -We have a report that has created in Feb 22 that picks up any contractor notes that require attention i.e., tamper / broken seal etc. This has strengthened our controls, but we agree that further work is required to ensure defectives meters are picked up ASAP.</p> <p><b>Reporting of distributed generation volumes</b> - We will be reviewing our end-to-end distributed generation process over the coming months with the intention of improving compliance</p> <p><b>Incorrect multipliers</b> - Our Revenue Assurance team are currently working on registry mismatches including multiplier differences with the aim of creating a robust process for this</p> | <p>Nov 2022</p> <p>July 2022</p> <p>Aug 2022</p> <p>Oct 2022</p> <p>July 2022</p> | <p>Identified</p>      |
| <p><b>Preventative actions taken to ensure no further issues will occur</b></p>   | <p><b>Completion date</b></p>   |                        |
| <p>As above</p>   |   |                        |

| <b>Temporarily electrical connection of an ICP</b>  |   |                        |
|---|---|------------------------|
| <b>Non-compliance</b>   | <b>Description</b>  |                        |
| Audit Ref: 2.10<br>With: Clause 10.33(1)<br><br>From: 21-Jul-21<br>To: 09-Oct-21  | Three ICPs temporarily electrically connected without written approval from the network owner.<br><br>Potential impact: Low<br><br>Actual impact: Low<br><br>Audit history: None<br><br>Controls: Moderate<br><br>Breach risk rating: 2 |                        |
| <b>Audit risk rating</b>  | <b>Rationale for audit risk rating</b>  |                        |
| <b>Low</b>  | The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.<br><br>The impact on settlement and participants is minor; therefore, the audit risk rating is low.                |                        |
| <b>Actions taken to resolve the issue</b>   |   | <b>Completion date</b> |
| We have a monthly compliance meeting with our New Connections team and will continue to review our processes / controls to look for improvements. |   | Ongoing                |
| <b>Preventative actions taken to ensure no further issues will occur</b>  |   | <b>Completion date</b> |
| As above  |   |                        |
| <b>Remedial action status</b>   |   |                        |
| Identified  |   |                        |

| Electrical Connection of Point of Connection  |  |                 |                        |
|---|--|-----------------|------------------------|
| Non-compliance  | Description  |                 |                        |
| <p>Audit Ref: 2.11</p> <p>With: Clause 10.33(a)</p> <p>From: 01-Jul-21</p> <p>To: 28-Jan-22</p>   | <p><b>GENE</b></p> <p>Two new connections were not certified within five business days.</p> <p>216 reconnections were not certified within five business days.</p> <p><b>GEOL</b></p> <p>51 reconnections were not certified within five business days.</p> <p><b>GENH</b></p> <p>Three new connections were not certified within five business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 as they will ensure compliance most of the time but the process to ensure certified metering is in place at the point of reconnection needs some improvement.</p> <p>Uncertified metering installations may be less accurate than certified metering installations, so there could be a minor impact on settlement. The audit risk rating is recorded as low.</p>  |                 |                        |
| Actions taken to resolve the issue  |  | Completion date | Remedial action status |
| <p>We will review our correct controls and look for improvements.</p> <p>Genesis notify MEPs of any reconnections that have an uncertified meter within 5 business days, we feel that the responsibility to certify the meter then sits with the MEP rather than Genesis</p> <p>We will continue to monitor our compliance via the AC020 report and seek to complete RCA for noncompliance and gain actionable insights</p> |  | Ongoing         | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |  | Completion date |                        |
| As above  |  |                 |                        |

| Meter bridging  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 2.17</p> <p>With: Clause 10.33C and 2A of Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>   | <p><b>GENE</b></p> <p>12 meters have yet to be unbridged, including ten from the previous audit. Four have now switched out.</p> <p>Consumption for the bridged period has not been submitted for 39 unbridged ICPs, including 34 from the previous audit.</p> <p><b>GEOL</b></p> <p>One meter has yet to be unbridged.</p> <p>Consumption for the bridged period has not been submitted for one unbridged ICPs and one ICP where it's not clear if bridging is still in place.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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 for bridging as there is improved reporting in place to adequately identify and notify the AMI MEPs of all bridged sites. There is room for improvement by confirming that all are corrections are completed and actioned.</p> <p>The number of ICPs affected is small and therefore the impact on settlement is minor therefore the audit risk rating is low.</p>   |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| Bridged Meter Reporting – We have implemented an automated Bridged Meter report that is worked by the metering team and W/O booked to ensure meters are unbridged. A separate report is also sent to MEPs advising them that their meters have been bridged | Dec 2021   | Identified             |
| Stopped Meter Reporting- A new automated daily zero consumption report has now been implemented (30 <sup>th</sup> March) and is worked by the metering team via a queue.  | Mar 2021   |                        |
| Work Order Report - a report has been created to highlight any W/O notes that are returned and need further investigation. This include picking up items that the contractor has been unable to complete and acts as an additional control.                 | Feb 2021   |                        |
| Bridged Meter Tracking - We will look to implement further tracking of Bridged meter to ensure all are followed through to completion and that the submission volumes are corrected.  | July 2022  |                        |

| Preventative actions taken to ensure no further issues will occur | Completion date |
|---|-----------------|
| As above  |                 |

| Changes to registry information   |   |                        |
|---|---|------------------------|
| Non-compliance  | Description   |                        |
| <p>Audit Ref: 3.3</p> <p>With: Clause 10 of schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>   | <p>Some status and trader updates were not processed within five business days of the event on the Registry.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>                                       |                        |
| Audit risk rating   | Rationale for audit risk rating   |                        |
| <b>Medium</b>   | <p>The controls are rated as moderate as Genesis have improved reporting and resource has been added but there is room for further improvement.</p> <p>The audit risk rating is assessed to be medium as the late updates have caused some volumes not to be corrected within the 14-month revision period.</p> |                        |
| Actions taken to resolve the issue  | Completion date   | Remedial action status |
| <p>Vacant consumption is now been actively worked and the report improved to remove unnecessary noise, based on some recommendation from this audit we will be looking to tweak this further to ensure it is effective. However, the fact that these issues occur make it impossible to be fully compliant with this clause</p> <p>New Connections have an MEP failure report in place to identify issues with MEP nominations, this is worked daily but we will look for improvements to this report.</p> <p>The AC020 report is run each month as is being used to gain RCA and provide actionable insights to improve compliance</p> <p>Genesis will also look to implement the above audit recommendation</p> | <p>Feb 2022</p> <p>Ongoing</p> <p>Ongoing</p> <p>Jul 2022</p>   | Identified             |
| Preventative actions taken to ensure no further issues will occur   | Completion date   |                        |
| As above  |   |                        |

| Trader responsibility for an ICP  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| Audit Ref: 3.4<br>With: Clause 11.18<br><br>From: 01-Jul-21<br>To: 13-Jan-22  | <b>GENE</b><br>Two incorrect MEP nominations.<br><br><b>GEOL</b><br>Two incorrect MEP nominations.<br><br>One decommissioned ICP where the MEP has not been notified of a sample of ten ICPs.<br><br>Potential impact: Low<br>Actual impact: Low<br><br>Audit history: Multiple times<br>Controls: Moderate<br>Breach risk rating: 2 |                        |
| Audit risk rating   | Rationale for audit risk rating  |                        |
| <b>Low</b>  | The controls are rated as moderate as the controls will mitigate risk most of the time.<br><br>The audit risk rating is low as the number of ICPs affected is small in relation to the overall volume.   |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| The ACO20 report is run each month as is being used to gain RCA and provide actionable insights to improve compliance<br><br>New Connection have strong control in place to pick up and correct issue with MEP nominations. We have a monthly Compliance meeting with the New Connections team to discuss performance / required corrective actions | Ongoing  | Identified             |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| Provision of information to the registry manager  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>  | <p><b>GENE</b></p> <p>1,549 late updates for new connections (84.86% updated within five business days).</p> <p>14 of a sample of 47 ICPs of a possible 1,310 ICPs had the incorrect first active date (29% error rate).</p> <p><b>GENH</b></p> <p>18 late updates for new connections (47.06% updated within five business days).</p> <p><b>GEOL</b></p> <p>177 late updates for new connections (37.46% updated within five business days).</p> <p>Eight of a sample of 21 ICPs of a possible 57 ICPs had the incorrect first active date (38% error rate).</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 overall as the new connections for GENE and GEOL do not have robust controls in place to ensure that ICPs are updated to active in good time and for the correct date. There is reporting available to assist with this but due to resource constraints particularly for GENE these are not always able to be worked.</p> <p>The audit risk rating is assessed to be low as this will have a small effect on reconciliation accuracy.</p>  |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| We have a monthly compliance meeting with our New Connections team and will continue to review our processes / controls to look for improvements. | Ongoing  | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |



| ANZSIC codes  |  |                                 |                        |
|---|--|---------------------------------|------------------------|
| Non-compliance  | Description  |                                 |                        |
| <p>Audit Ref: 3.6</p> <p>With: Clause 9(1)(k) of schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>  | <p><b>GENE</b></p> <p>Two ICPs of a sample of 15 ICPs checked of a possible 75 ICPs with a category 2 meter and incorrectly recorded as residential.</p> <p>Six ICPs of a sample of 100 ICPs checked with an incorrect ANZSIC code recorded. 6% error rate.</p> <p><b>GEOL</b></p> <p>14 ICPs of a sample of 15 ICPs checked of a possible 69 ICPs with a category 2 meter and incorrectly recorded as residential.</p> <p>Nine ICPs of a sample of 80 ICPs checked with an incorrect ANZSIC code recorded. 11% error rate.</p> <p><b>GENH</b></p> <p>Five ICPs of a sample of 50 ICPs checked with an incorrect ANZSIC code recorded. 10% error rate</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>The controls are rated as moderate as the controls will mitigate risk to an acceptable level but there is room for improvement.</p> <p>The audit risk rating is low as this has no material effect on reconciliation.</p>   |                                 |                        |
| Actions taken to resolve the issue  |  | Completion date                 | Remedial action status |
| <p>Controls are in place to pick up any ANZSIC codes that are blank or not known and these are corrected accordingly.</p> <p>We are currently using the AC020 report to report on ANZSIC code errors and will be using this to investigate and correct these issues</p> |  | <p>Completed</p> <p>Ongoing</p> | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |  | Completion date                 |                        |
| As above  |  |                                 |                        |

| Changes to unmetered load  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| Audit Ref: 3.7<br>With: Clause 9(1)(f) of Schedule 11.1<br>From: 01-Jul-21<br>To: 13-Jan-22                          | <b>GENE</b><br>Two ICPs with the daily unmetered kWh load missing.<br>17 ICPs with the incorrect unmetered daily kWh load recorded.<br>ICP 0000554295NR0DA had no unmetered load but the unmetered load flag was incorrectly set to "Y".<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Multiple times<br>Controls: Moderate<br>Breach risk rating: 2 |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | Controls are rated as moderate but there is room for improvement.<br>The impact on settlement is minor, therefore the audit risk rating is low.   |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| The AC020 report is now being run monthly and we will continue to use this to monitor compliance and correct issues. | Ongoing   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| As above   |   |                        |

| Management of "active" status  |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| <p>Audit Ref: 3.8</p> <p>With: Clause 17 of schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>            | <p><b>GENE</b></p> <p>14 of a sample of 47 ICPs of a possible 1,310 ICPs had the incorrect first active date (29% error rate).</p> <p>Five active unmetered BTS ICPs at the incorrect status.</p> <p><b>GEOL</b></p> <p>Eight of a sample of 21 ICPs of a possible 57 ICPs had the incorrect first active date (38% error rate).</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 overall as the new connections for GENE and GEOL do not have robust controls in place to ensure that ICPs are updated to active for the correct date. There is reporting available to assist with this but due to resource constraints particularly for GENE these are not always able to be worked.</p> <p>The audit risk rating is low when considering the number of potential ICPs with incorrect active dates.</p>                              |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| The AC020 report is now being run monthly and we will continue to use this to monitor compliance and correct issues. |  | Ongoing         | Identified             |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
| As above   |  |                 |                        |

| Management of "inactive" status  |  |                               |                        |
|--|--|-------------------------------|------------------------|
| Non-compliance   | Description  |                               |                        |
| <p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>  | <p><b>GENE</b></p> <p>Two incorrect inactive reason statuses.</p> <p>11 of a sample of 36 inactive ICPs with consumption have not been corrected.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p> |                               |                        |
| Audit risk rating  | Rationale for audit risk rating  |                               |                        |
| <b>Medium</b>  | <p>The controls are rated as moderate because there is room for improvement with regard to the identification and correction of incorrect statuses.</p> <p>Settlement is not occurring in some cases until the status is corrected, therefore the audit risk rating is medium.</p>                             |                               |                        |
| Actions taken to resolve the issue   |  | Completion date               | Remedial action status |
| <p>Vacant consumption is now been actively worked and the report improved to remove unnecessary noise, based on some recommendation from this audit we will be looking to tweak this further to ensure it is effective. However, the fact that these issues occur make it impossible to be fully compliant with this clause</p> <p>The AC020 report is run each month as is being used to gain RCA and provide actionable insights to improve compliance</p> |  | <p>Ongoing</p> <p>Ongoing</p> | Identified             |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date               |                        |
| As above   |  |                               |                        |

| Inform registry of switch request for ICPs - standard switch   |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 4.1</p> <p>With: Clause 2 of schedule 11.3</p> <p>From: 07-Jul-21</p> <p>To: 09-Jul-21</p>   | <p><b>GEOL</b></p> <p>One of the sample of ten ICPs sent incorrectly as a TR switch instead of MI.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be none but low is the best alternative option as this has no impact on reconciliation.</p>               |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change | TBC   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| As above   |   |                        |

| Losing trader response to switch request and event dates - standard switch  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 4.2</p> <p>With: Clause 3 of schedule 11.3</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>  | <p><b>GENE</b></p> <p>All five "AA" AN files sampled of a possible 55 ICPs sent with the incorrect code. "AD" should have been used.</p> <p>All five "AD" AN files sampled of a possible 404 ICPs sent with the incorrect code. "AA" should have been sent.</p> <p>ICP 0007197334RNBE4 was sent with an "MU" AN code in error.</p> <p>Two AN files incorrectly sent with the "PD" code.</p> <p><b>GEOL</b></p> <p>All five "AA" AN files sampled of a possible 29 ICPs sent with the incorrect code. "AD" should have been used.</p> <p>Four "AD" AN files sent with the incorrect code. "AA" should have been sent.</p> <p>Two ANs sent with a proposed event date greater than ten days in advance.</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>The controls are rated as strong as the process is driven off the ICP attributes based on a hierarchy. The errors above were due to the manual processing of a small number of AN files.</p> <p>The audit risk rating is low as only a small number of incorrect codes were identified and only one late file was identified. This has no direct impact on reconciliation.</p>  |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change. | TBC  | Identified             |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| Losing trader response to switch request and event dates - standard switch                         |  |
|--|--|
| Non-compliance   | Description  |
| <p>Audit Ref: 4.3<br/>With: Clause 5 of schedule 11.3</p> <p>From: 01-Jul-21<br/>To: 13-Jan-22</p> | <p>The average daily consumption calculation is not calculated from the last read period.</p> <p><b>GENE</b></p> <p>Three ICPs with a negative average daily consumption is incorrect as it is not consumption.</p> <p>All five ICPs checked of a possible 1,105 were sent with an incorrect last read date of the day before the switch but the read was an estimate.</p> <p>All three ICPs checked of a possible 14 were sent with a last actual read date after GENE's period of supply.</p> <p>Three of a possible 18 ICPs sent incorrectly with a last actual read date for the event date and two of these were sent with an incorrect read type of E.</p> <p>One E2 breach.</p> <p><b>GEOL</b></p> <p>Four of five ICPs sampled of a possible 80 ICPs with the incorrect average daily consumption of zero due to using the final billed average instead of read-to-read consumption.</p> <p>All five ICPs checked of a possible 315 were sent with an incorrect last read date of the day before the switch but the read was an estimate.</p> <p>One CS file sent with incorrect read type of estimate when it should have been actual.</p> <p>Two ICPs sent with a last actual read date after GENE's period of supply.</p> <p>All three ICPs checked of a possible six were sent incorrectly with a last actual read date for the event date.</p> <p>One E2 breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 recorded as weak as the volume of errors found in the ICPs sample was high indicating that the logic in Gentrack needs to be reviewed to improve accuracy.</p> <p>The audit risk rating is low as the overall volume of files with incorrect content were small in relation to the overall volume of switches processed.</p>   |

| <b>Actions taken to resolve the issue</b>  | <b>Completion date</b> | <b>Remedial action status</b> |
|--|------------------------|-------------------------------|
| We will review this process to see if improvements can be made within Gentrack       | Oct 22                 | Investigating                 |
| The Switching processes will also be reviewed as part of our billing platform change | TBC                    |                               |
| <b>Preventative actions taken to ensure no further issues will occur</b>             | <b>Completion date</b> |                               |
| As above   |                        |                               |

| <b>Non-half hour switch event meter reading - standard switch</b>  |   |                               |
|--|---|-------------------------------|
| <b>Non-compliance</b>  | <b>Description</b>  |                               |
| Audit Ref: 4.5<br>With: Clause 6(3)<br>Schedule 11.3<br><br>From: 09-Jul-21<br>To: 16-Jul-21   | <p><b>GENE</b></p> <p>One RR rejected in error.</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>                                      |                               |
| <b>Audit risk rating</b>   | <b>Rationale for audit risk rating</b>  |                               |
| <b>Low</b>   | <p>The controls are recorded as strong because they mitigate risk to an acceptable level. This was a one-off human error.</p> <p>The audit risk rating is assessed to be low as the correct read was subsequently accepted.</p> |                               |
| <b>Actions taken to resolve the issue</b>  | <b>Completion date</b>  | <b>Remedial action status</b> |
| We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change | TBC   | Identified                    |
| <b>Preventative actions taken to ensure no further issues will occur</b>   | <b>Completion date</b>  |                               |
| Training has been provided to the CSR in question  | Mar 22  |                               |



| <b>Gaining trader informs registry of switch request - switch move</b>   |  |                               |
|--|--|-------------------------------|
| <b>Non-compliance</b>  | <b>Description</b>   |                               |
| Audit Ref: 4.7<br>With: Clause 9<br>Schedule 11.3<br><br>From: 06-Sep-21<br>To: 07-Oct-21  | <b>GENH</b><br>One of the sample of five ICPs sent incorrectly as a MI switch instead of TR.<br>Potential impact: None<br>Actual impact: None<br>Audit history: Once previously<br>Controls: Strong<br>Breach risk rating: 1 |                               |
| <b>Audit risk rating</b>   | <b>Rationale for audit risk rating</b>   |                               |
| <b>Low</b>   | The controls are recorded as strong because they mitigate risk to an acceptable level.<br>The audit risk rating is assessed to be none but low is the best alternative option as this has no impact on reconciliation.       |                               |
| <b>Actions taken to resolve the issue</b>  | <b>Completion date</b>   | <b>Remedial action status</b> |
| We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change | TBC  | Identified                    |
| <b>Preventative actions taken to ensure no further issues will occur</b>   | <b>Completion date</b>   |                               |
| As above   |  |                               |

| Losing trader provides information - switch move   |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| <p>Audit Ref: 4.8</p> <p>With: Clause 10(1) of schedule 11.3</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>   | <p><b>GENE</b></p> <p>All five "AA" AN files sampled of a possible 219 ICPs sent with the incorrect code. "AD" should have been used.</p> <p>All five "AD" AN files sampled of a possible 427 ICPs sent with the incorrect code. "AA" should have been sent.</p> <p>All five "MU" AN files sampled of a possible 12 ICPs sent with the incorrect AN code.</p> <p>Two AN files sent with a proposed event date greater than ten days after the NT receipt date.</p> <p>Two AN files sent with a proposed event date prior to the requested event date.</p> <p>2 T2 breaches.</p> <p><b>GEOL</b></p> <p>All five "AA" AN files sampled of a possible 71 ICPs sent with the incorrect code. "AD" should have been used.</p> <p>All five "AD" AN files sampled of a possible 103 ICPs sent with the incorrect code. "AA" should have been sent.</p> <p>ICP 0000025568CE4FE sent with the incorrect "MU"AN code.</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>The controls are rated as strong as the process is driven off the ICP attributes based on a hierarchy. The errors above were due to the manual processing of a small number of AN files.</p> <p>The audit risk rating is low as only a small number of incorrect codes were identified and only one late file was identified. This has no direct impact on reconciliation.</p>  |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change |  | TBC             | Identified             |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
| As above   |  |                 |                        |

| Losing trader determines a different date - switch move  |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| Audit Ref: 4.9<br>With: Clause 10(2) of schedule 11.3<br><br>From: 07-Jan-22<br>To: 21-Jan-22  | <b>GENE</b><br>ICP 1000010079OY5BE was not completed within ten business days of the NT receipt date.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Strong<br>Breach risk rating: 1 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                        |
| <b>Low</b>   | The controls are rated as strong as they are robust and will mitigate risk to an acceptable level.<br>The audit risk rating is low as only one ICP was found to be non-compliant.  |                        |
| Actions taken to resolve the issue   | Completion date  | Remedial action status |
| We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change | TBC  | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date  |                        |
| As above   |  |                        |



| Actions taken to resolve the issue  | Completion date          | Remedial action status |
|---|--------------------------|------------------------|
| <p>We will review this process to see if improvements can be made within Gentrack</p> <p>The Switching processes will also be reviewed as part of our billing platform change</p> | <p>Oct 22</p> <p>TBC</p> | <p>Investigating</p>   |
| <p>Preventative actions taken to ensure no further issues will occur</p>  | <p>Completion date</p>   |                        |
| <p>As above</p>   |                          |                        |

| Gaining trader changes to switch meter reading - switch move  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 4.11</p> <p>With: Clause 12 of schedule 11.3</p> <p>From: 16-Nov-21</p> <p>To: 22-Dec-21</p>  | <p><b>GENE</b></p> <p>RRs sent for ICPs 0147623847LC8C6 and 1000516809PCE61 were not supported by two validated reads.</p> <p>Four RR breaches.</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  |                        |
| <p><b>Low</b></p>   | <p>The controls are rated as strong as they will mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as the small number of late files will have only a minor effect on reconciliation.</p>  |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| <p>We are confident that we have strong controls in place to manage this. The Switching processes will be reviewed as part of our billing platform change</p> | <p>TBC</p>   | <p>Identified</p>      |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| <p>As above</p>   |  |                        |

| <b>Gaining trader informs registry of switch request - gaining trader switch</b>   |  |                               |
|--|--|-------------------------------|
| <b>Non-compliance</b>  | <b>Description</b>   |                               |
| Audit Ref: 4.12<br>With: Clause 14<br>Schedule 11.3<br><br>From: 01-Jul-21<br>To: 13-Jan-22  | HH switch NT files sent for three ineligible ICPs.<br>One PT breach indicating a backdated switch.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Once previously<br>Controls: Moderate<br>Breach risk rating: 2 |                               |
| <b>Audit risk rating</b>   | <b>Rationale for audit risk rating</b>   |                               |
| <b>Low</b>   | The controls are recorded as moderate because they mitigate risk most of the time.<br>The impact on settlement and participants is minor; therefore, the audit risk rating is low.   |                               |
| <b>Actions taken to resolve the issue</b>  | <b>Completion date</b>   | <b>Remedial action status</b> |
| We will review this process to see if improvements can be made within Gentrack<br>The Switching processes will also be reviewed as part of our billing platform change | Oct 22<br><br>TBC  | Investigating                 |
| <b>Preventative actions taken to ensure no further issues will occur</b>   | <b>Completion date</b>   |                               |
| As above   |  |                               |

| Withdrawal of switch requests   |   |                          |                        |
|---|---|--------------------------|------------------------|
| Non-compliance  | Description   |                          |                        |
| <p>Audit Ref: 4.15</p> <p>With: Clause 17 &amp; 18 of schedule 11.3</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>   | <p><b>GENE</b></p> <p>Three incorrect NW codes of a sample of 14 ICPs checked.</p> <p>Eight SR breaches.</p> <p>53 NA breaches.</p> <p><b>GEOL</b></p> <p>Two incorrect NW codes of a sample of 13 ICPs checked.</p> <p>Five SR breaches.</p> <p>26 NA breaches.</p> <p><b>GENH</b></p> <p>One incorrect NW code of a sample of nine ICPs checked.</p> <p>One NA breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> |                          |                        |
| Audit risk rating   | Rationale for audit risk rating   |                          |                        |
| <b>Low</b>  | <p>The controls are recorded as strong as these are managed on a case by case with good control. The errors found were minor.</p> <p>The audit risk rating is assessed to be low as this will have a minor effect on reconciliation.</p>  |                          |                        |
| Actions taken to resolve the issue  |   | Completion date          | Remedial action status |
| <p>We will review this process to see if improvements can be made within Gentrack</p> <p>The Switching processes will also be reviewed as part of our billing platform change</p> |   | <p>Oct 22</p> <p>TBC</p> | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date          |                        |
| TBC   |   |                          |                        |

| Metering information  |  |                          |                        |
|---|--|--------------------------|------------------------|
| Non-compliance  | Description  |                          |                        |
| <p>Audit Ref: 4.16</p> <p>With: Clause 216 of schedule 11.3</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>   | <p><b>GENE</b></p> <p>Six incorrectly labelled last reads sent.</p> <p><b>GEOL</b></p> <p>One incorrectly labelled last read sent.</p> <p>Two incorrect last reads sent of those sampled resulting in 157 kWh being pushed to the gaining trader.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> |                          |                        |
| Audit risk rating   | Rationale for audit risk rating  |                          |                        |
| <b>Low</b>  | <p>The controls are rated as moderate as the controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low as these are expected to be corrected through the RR process in most cases.</p>   |                          |                        |
| Actions taken to resolve the issue  |  | Completion date          | Remedial action status |
| <p>We will review this process to see if improvements can be made within Gentrack</p> <p>The Switching processes will also be reviewed as part of our billing platform change</p> |  | <p>Oct 22</p> <p>TBC</p> | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |  | Completion date          |                        |
| As above  |  |                          |                        |



| Switch save protection  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| Audit Ref: 4.17<br>With: Clause 11.15AA to 11.15AC<br><br>From: 23-Sep-21<br>To: 13-Jan-22  | <b>GENE</b><br>One of 15 ICPs checked where agent attempted to retain the customer.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Strong<br>Breach risk rating: 1 |                        |
| Audit risk rating   | Rationale for audit risk rating  |                        |
| <b>Low</b>  | The controls are rated as strong and will mitigate risk to an acceptable level.<br>The audit risk rating is low there was only one incident identified where win back activity was evident.            |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| We have strong controls in place to ensure we follow the rules regarding Win-Back rules. Although no direct offer was made for the customer to stay, they were asked why they were not taking Genesis with them.<br><br>This call has been sent through the employee's team leader and they will be reminded of the rules and requirements regarding this<br><br>The call has been passed on to the relevant team leaders for feedback / training to be provided to the CSR | Apr 2022   | Identified             |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| <b>Maintaining shared unmetered load</b>  |  |   |                               |
|---|--|---|-------------------------------|
| <b>Non-compliance</b>   |  | <b>Description</b>  |                               |
| Audit Ref: 5.1<br>With: Clause 11.14<br><br>From: 01-Jul-21<br>To: 13-Jan-22  |  | <b>GENE</b><br>Four ICPs with the incorrect shared unmetered load value.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2   |                               |
| <b>Audit risk rating</b>  |  | <b>Rationale for audit risk rating</b>  |                               |
| <b>Low</b>  |  | The controls are recorded as moderate, and I recommend in <b>section 3.7</b> an additional validation that will move controls to strong.<br><br>The audit risk rating is assessed to be low as the impact on reconciliation will be very minor. |                               |
| <b>Actions taken to resolve the issue</b>   |  | <b>Completion date</b>  | <b>Remedial action status</b> |
| We will continue to monitor our compliance via the AC020 report and seek to complete RCA for noncompliance and gain actionable insights to increase compliance. We will investigate the items on the AC020 report and arrange for them to be cleared. |  | Ongoing   | Identified                    |
| <b>Preventative actions taken to ensure no further issues will occur</b>  |  | <b>Completion date</b>  |                               |
| As above  |  |   |                               |

| Unmetered threshold   |  |   |                        |
|---|--|---|------------------------|
| Non-compliance  |  | Description   |                        |
| Audit Ref: 5.2<br>With: Clause 10.14 (2)(b)<br><br>From: 01-Aug-18<br>To: 13-Jan-22   |  | <b>GENE</b><br>Seven ICPs with unmetered load over 6,000 kWh per annum.<br>Potential impact: Medium<br>Actual impact: Unknown<br>Audit history: Multiple times<br>Controls: Weak<br>Breach risk rating: 3   |                        |
| Audit risk rating   |  | Rationale for audit risk rating   |                        |
| <b>Low</b>  |  | The controls are recorded as weak as there has been little progress made in relation to these ICPs during the audit period due to resource constraints.<br><br>The impact on settlement is unknown because the load has not been checked but submission is occurring. I have recorded the audit risk rating as low. |                        |
| Actions taken to resolve the issue  |  | Completion date   | Remedial action status |
| We will continue to monitor our compliance via the AC020 report and seek to complete RCA for noncompliance and gain actionable insights to increase compliance. We will investigate the items on the AC020 report and arrange for them to be cleared. |  | Ongoing   | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |  | Completion date   |                        |
| As above  |  |   |                        |

| Unmetered threshold exceeded  |   |                        |
|---|---|------------------------|
| Non-compliance  | Description   |                        |
| Audit Ref: 5.3<br>With: Clause 10.14 (5)<br><br>From: 01-Jul-19<br>To: 13-Jan-22  | <b>GENE</b><br>Unmetered load over 6,000 kWh per annum and not resolved within the allowable timeframes.<br>Potential impact: Medium<br>Actual impact: Unknown<br>Audit history: Multiple times<br>Controls: Weak<br>Breach risk rating: 3  |                        |
| Audit risk rating   | Rationale for audit risk rating   |                        |
| <b>Low</b>  | The controls are recorded as weak as there has been little progress made in relation to these ICPs during the audit period due to resource constraints.<br>The impact on settlement is unknown because the load has not been checked but submission is occurring. I have recorded the audit risk rating as low. |                        |
| Actions taken to resolve the issue  | Completion date   | Remedial action status |
| We will continue to monitor our compliance via the AC020 report and seek to complete RCA for noncompliance and gain actionable insights to increase compliance. We will investigate the items on the AC020 report and arrange for them to be cleared.<br>We will also review the end-to-end process for Unmetered ICPs and look for process / compliance improvements | Ongoing<br><br>Nov 22   | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date   |                        |
| As above  |   |                        |

| <b>Distributed unmetered load</b>   |   |                        |
|---|---|------------------------|
| <b>Non-compliance</b>   | <b>Description</b>  |                        |
| <p>Audit Ref: 5.4</p> <p>With: Clause 11<br/>Schedule 15.3</p> <p>From: 01-Jul-21</p> <p>To: 28-Feb-22</p>  | <p><b>GENE</b></p> <p>Inaccurate submission information for several databases.</p> <p>Nine database audits not completed.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>  |                        |
| <b>Audit risk rating</b>  | <b>Rationale for audit risk rating</b>  |                        |
| <b>High</b>   | <p>The controls are rated as weak as due to resource constraints the issues raised are not always able to be progressed. Genesis is aware of this, and additional resource is being sought.</p> <p>There is a major impact on settlement outcomes because there are examples of over submission and under submission; therefore, the audit risk rating is high.</p> |                        |
| <b>Actions taken to resolve the issue</b>   |   | <b>Completion date</b> |
| <p>We established the role of DUML Data and Stakeholder lead in September 2021, due to the transition over from the reconciliation team and the handover of duties they have only recently started to focus on the role. The focus over the next 12 months will be liaising with DUML customers and working towards improving the compliance / accuracy of data</p> |   | Jan 2023               |
| <b>Preventative actions taken to ensure no further issues will occur</b>  |   | <b>Completion date</b> |
| As above  |   |                        |
| <b>Remedial action status</b>   |   |                        |
| Identified  |   |                        |

| Electricity conveyed & notification by embedded generators   |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 6.1</p> <p>With: Clause 10.13,<br/>Clause 10.24 and 15.13</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>  | <p><b>GENE</b></p> <p>14 ICPs of the sample of 20 checked of a possible 134 ICPs that were generating or likely to be generating but did not have compliant metering installed, and notification of gifting had not been provided.</p> <p>Nine of the ICPs reported in the 2021 audit that were generating have not been corrected.</p> <p>ICP 1001156573UNA50 did not have a settled I flow register present but was recorded with the RPS PV1 profile.</p> <p>ICP 0000020776CE0EF had the incorrect generation profile of RPS PV1 and has been corrected to RPS EG1.</p> <p><b>GEOL</b></p> <p>17 ICPs that were generating or likely to be generating but did not have compliant metering installed, and notification of gifting had not been provided.</p> <p><b>GENH</b></p> <p>ICP 0000130740WEA40 is likely to be generating but does not have compliant metering installed, and notification of gifting had not been provided.</p> <p><b>Bridged meters GENE and GEOL</b></p> <p>Approximately 25 meters are bridged each month. While meters are bridged energy is not quantified in accordance with the code.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p> |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | <p>Controls are rated as weak as there is room for improvement for both the management of distributed generation and bridged meters.</p> <p>The audit risk rating is assessed to be low due to the small number of ICPs affected.</p>   |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| <p>The Distributed Generation processes will be reviewed with a view to improving the end-to-end process.</p> <p>Bridged Meter Reporting – We have implemented an automated Bridged Meter report that is worked by the metering team and W/O booked to ensure meters are unbridged</p> | <p>Dec 2022</p> <p>Ongoing</p>  | <p>Investigating</p>   |

| Preventative actions taken to ensure no further issues will occur | Completion date |
|---|-----------------|
| As above  |                 |

| Responsibility for metering at GIP   |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| Audit Ref: 6.2<br>With: Clause 10.26(7)<br><br>From: 01-Jul-21<br>To: 31-Jan-22  | One late certification update made to the RM.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: Once<br>Controls: Moderate<br>Breach risk rating: 2                                   |                        |
| Audit risk rating  | Rationale for audit risk rating  |                        |
| <b>Low</b>   | Controls are rated as moderate for the updating of GIPs meter recertifications.<br>The audit risk rating is low as the meters were certified at all times and there was no impact on reconciliation. |                        |
| Actions taken to resolve the issue   | Completion date  | Remedial action status |
| The Genesis team responsible for this have been advised of this noncompliance and are aware of the requirements, the NSP in questions was a cross over from them being made aware of the requirement based on the previous audit | Aug 2021   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date  |                        |
| As above   |  |                        |

| Collection of information by certified reconciliation participant   |   |                        |
|---|---|------------------------|
| Non-compliance  | Description   |                        |
| Audit Ref: 6.5<br>With: Clause 2 Schedule 15.2<br><br>From: 01-Jul-21<br>To: 31-Jan-22  | Time Sync reports not reviewed for all AMI MEPs.<br><br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                        |
| <b>Low</b>  | The controls are recorded as moderate as where AMI MEPs provide email notification of time sync issues these are actioned.  |                        |
| Actions taken to resolve the issue  | Completion date   | Remedial action status |
| We will review this and look to put process in place with all AMI MEPs regarding time sync reports and other metering event reports | July 2022   | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date   |                        |
| As above  |   |                        |



| Derivation of meter readings   |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| <p>Audit Ref: 6.6</p> <p>With: Clauses 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>  | <p><b>GENE</b></p> <p>No consistent action taken to address the ICP with signs of tampering or damage. No follow up where service requests are turned down due to access issues, H&amp;S letters not followed up where consumers do not respond.</p> <p>Customer reads still not being validated against a set of readings from another source.</p> <p><b>GEOL</b></p> <p>No consistent action taken to address the ICP with signs of tampering or damage. No follow up where service requests are tuned down due to access issues, H&amp;S letters not followed up where consumers do not respond</p> <p>Customer reads still not being validated against a set of readings from another source.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p> |                        |
| Audit risk rating  | Rationale for audit risk rating  |                        |
| <b>Low</b>   | <p>Controls are rated as weak as the management of meter events remains patchy resulting in potential defective metering not being corrected in a timely manner.</p> <p>The impact is assessed to be low, as the volume of events is small in relation to the number of ICPs.</p>  |                        |
| Actions taken to resolve the issue   | Completion date  | Remedial action status |
| <p>We have recently created a Contractor notes report to pick up items that need further investigation i.e., tamper, broken seals etc.</p> <p>We are also reviewing our meter reader notes process to highlight any items that require further action.</p> | <p>Feb 2022</p> <p>Oct 2022</p>  | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date  |                        |
| As above   |  |                        |

| NHH meter reading application   |   |                            |                        |
|---|---|----------------------------|------------------------|
| Non-compliance  | Description   |                            |                        |
| <p>Audit Ref: 6.7</p> <p>With: Clause 6<br/>Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>   | <p><b>GENE</b></p> <p>Six incorrectly labelled last reads sent.</p> <p>Two instances where no actual validated meter read used to transition an ICP between HHR and NHH submission type.</p> <p>Switch loss reads for some MI switches not reflective of the HHR submission volumes up to the switch date.</p> <p>NHH meter reading is not applied at 2400 on the day of the meter reading for upgrades.</p> <p><b>GEOL</b></p> <p>One incorrectly labelled last read sent.</p> <p>Two incorrect last reads sent of those sampled resulting in 157 kWh being pushed to the gaining trader.</p> <p>One instances where no actual validated meter read used to transition an ICP between HHR and NHH submission type.</p> <p>Switch loss reads for two MI switches not reflective of the HHR submission volumes up to the switch date.</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>The controls are rated as moderate as there is room for improvement with switch read accuracy.</p> <p>The audit risk rating is low as any variances between gain read and reads sent in the CS file are addressed via the RR process initiated by the gaining trader in most instances providing the RR is accepted.</p>   |                            |                        |
| Actions taken to resolve the issue  |   | Completion date            | Remedial action status |
| <p>We will review this process to see if improvements can be made within Gentrack</p> <p>The Switching processes will also be reviewed as part of our billing platform change</p> |   | <p>Oct 2022</p> <p>TBC</p> | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date            |                        |
| As above  |   |                            |                        |

| Interrogate meters once   |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>  | <p><b>GENE</b></p> <p>Three of the sample of ten ICPs unread during the period of supply did not have exceptional circumstances and, the best endeavours requirement was not met.</p> <p><b>GEOL</b></p> <p>Five of the sample of ten ICPs unread during the period of supply did not have exceptional circumstances and, the best endeavours requirement was not met.</p> <p>Potential impact: Medium</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 moderate and will mitigate risk most of the time but there is room for improvement.</p> <p>The impact on billing and settlement is considered to be minor because a small number of ICPs are affected, and the period of supply is generally short.</p>  |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| <p>No Access Cycle – In March 2022 our automated no access cycle was turned back on (was turned off due to Covid) This ensure that we communicate with customers via different methods if we are unable to obtain a reading.</p> <p>In December 2022 we initiated an RP Audit response team, this team of 6 have been working through our no access list focusing on those customers who we have not read for 12 months and attempting to resolve the issues causing this</p> | <p>Feb 22</p> <p>Dec 21</p>  | Identified             |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| NHH meters interrogated annually  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>  | <p><b>GENE</b></p> <p>Three of a sample of 14 ICPs unread in the 12 months ended Sept 2021, did not have exceptional circumstances and the best endeavors requirement was not met.</p> <p><b>GEOL</b></p> <p>Two of the sample of 10 ICPs unread in the 12 months ended Sept 2021, did not have exceptional circumstances and the best endeavors requirement was not met.</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>Controls are moderate as the process to manage of unread ICPs has been improved during the audit period with most ICPs being identified or actioned.</p> <p>The impact is low, because overall read attainment rates are reasonably high.</p>   |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| <p>No Access Cycle – In March 2022 our automated no access cycle was turned back on (was turned off due to Covid) This ensure that we communicate with customers via different methods if we are unable to obtain a reading.</p> <p>In December 2022 we initiated an RP Audit response team, this team of 6 have been working through our no access list focusing on those customers who we have not read for 12 months and attempting to resolve the issues causing this</p> <p>Customer on annual read sequences is currently being reviewed, we only currently have 67 ICPs on this and some are due to location ‘boat needed to access meter’ and others are due to historic customer issues.</p> | Feb 22   | Identified             |
|   | Dec 21   |                        |
|   | June 2022  |                        |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| NHH meters 90% read rate  |   |   |                        |
|---|---|---|------------------------|
| Non-compliance  | Description   |   |                        |
| <p>Audit Ref: 6.10</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>   | <p><b>GENE</b></p> <p>Exception circumstances did not apply, and the best endeavours requirement was not met for any of the 15 ICPs sampled.</p> <p><b>GEOL</b></p> <p>Exception circumstances did not apply, and the best endeavours requirement was not met for any of the ten ICPs sampled.</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 moderate and will mitigate risk most of the time but there is room for improvement.</p> <p>The impact is low, because overall read attainment rates are reasonably high.</p>  |   |                        |
| Actions taken to resolve the issue  |   | Completion date                                 | Remedial action status |
| <p>No Access Cycle – In March 2022 our automated no access cycle was turned back on (was turned off due to Covid) This ensure that we communicate with customers via different methods if we are unable to obtain a reading.</p> <p>In December 2022 we initiated an RP Audit response team, this team of 6 have been working through our no access list focusing on those customers who we have not read for 12 months and attempting to resolve the issues causing this</p> <p>Account Managed Customer process will be reviewed, and we will investigate the possibility of including them in our No Access cycle. We will also investigate how we can improve the read % attainment for those NSP that we are under 90%</p> |   | <p>Feb 2022</p> <p>Dec 2022</p> <p>Oct 2022</p> | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date                                 |                        |
| As above  |   |   |                        |

| Correction of HHR metering information  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 8.2</p> <p>With: Clause 19(2)<br/>Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>             | <p>Not all HHR corrections performed.</p> <p>ICP 0005193958RN6F2 had no correction applied for missing data from removed meter.</p> <p>Extended period estimations not corrected or resolved in a timely manner where an AMI meter stops communicating.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>  |                        |
| Audit risk rating   | Rationale for audit risk rating  |                        |
| <b>Low</b>  | <p>Controls around HHR corrections are moderate as there is a reliance on the skill and expertise of the reconciliation analysts to process a number of email notifications of required corrections from other teams where the phrases within the emails makes it challenging to determine the correct remedial course of action.</p> <p>There are only a few ICPs/meters where corrections are not fully resolved for HHR volumes however as this data is also used by the RM to produce seasonal shape files for all NHH retailers to calculate HE volumes the impact is medium.</p> |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| We will investigate improving the process / timeliness of moving non-communicating AMI meters back to NHH for submissions | Aug 2022   | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| Identification of readings  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 9.1</p> <p>With: Clause 3(3)<br/>Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 13-Jan-22</p>  | <p><b>GENE</b></p> <p>Six incorrectly labelled last reads sent.</p> <p><b>GEOL</b></p> <p>One incorrectly labelled last read sent.</p> <p>Two incorrect last reads sent of those sampled resulting in 157 kWh being pushed to the gaining trader.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> |                        |
| Audit risk rating   | Rationale for audit risk rating  |                        |
| <b>Low</b>  | <p>The controls are assessed to be moderate, and the impact is assessed to be low. Most readings were correctly classified.</p> <p>The audit risk rating is assessed to be low as the volume of errors was small overall.</p>  |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| <p>We will review this process to see if improvements can be made within Gentrack</p> <p>The Switching processes will also be reviewed as part of our billing platform change</p> | <p>Oct 22</p> <p>TBC</p>   | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| Meter data used to derive volume information   |   |                 |                        |
|--|---|-----------------|------------------------|
| Non-compliance   | Description   |                 |                        |
| <p>Audit Ref: 9.3</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 02-Jul-21</p> <p>To: 31-Jan-22</p>  | <p>Some data collected by Stark is rounded when collected from the metering installation.</p> <p>AMI meter reading data is truncated for import into Gentrack and Derive.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>      |                 |                        |
| Audit risk rating  | Rationale for audit risk rating   |                 |                        |
| <b>Low</b>   | <p>The controls are moderate. Only AMI meters which are settled as NHH are affected by meter readings being truncated in Gentrack and Derive.</p> <p>The impact is assessed to be low. Only NHH settled AMI readings provided with decimal places are affected, and the overall kWh difference is expected to be small.</p> |                 |                        |
| Actions taken to resolve the issue   |   | Completion date | Remedial action status |
| The rounding issue will be addressed as part of our Billing platform change. This is unlikely to be change prior to this due to the impact being extremely low |   | TBC             | Investigating          |
| Preventative actions taken to ensure no further issues will occur  |   | Completion date |                        |
| As above   |   |                 |                        |



| Half hour estimates  |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| Audit Ref: 9.4<br>With: Clause 15<br>Schedule 15.2<br><br>From: 01-Jul-21<br>To: 31-Jan-22                                       | Reasonable endeavors not met where default estimation methodology applied due to extended estimation performed on long term non communication AMI ICPs.<br><br>Potential impact: Medium<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2  |                        |
| Audit risk rating  | Rationale for audit risk rating  |                        |
| <b>Low</b>   | The controls are recorded as moderate because while estimates are created, they are not always the correct treatment for addressing non communicating AMI ICPs.<br><br>The impact is low because revised submission data is eventually provided once the submission type is backdated to NHH for historical periods. There is some impact to seasonal shapes used for NHH submissions where these bulk retrospective updates of submission types (HHR to NHH) occur. |                        |
| Actions taken to resolve the issue   | Completion date  | Remedial action status |
| We will review this process and look to improve the process / timeliness of moving non communicating AMI meter to NHH settlement | Dec 2022   | Investigating          |
| Preventative actions taken to ensure no further issues will occur  | Completion date  |                        |
| As above   |  |                        |

| NHH metering information data validation   |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 9.5</p> <p>With: Clause 16<br/>Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>   | <p><b>GENE and GEOL</b></p> <p>Not all vacant consumption is being captured.</p> <p>Not all inactive consumption is being captured.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>   |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Medium</b>  | <p>The controls are recorded as moderate overall. Expected validations are being managed including now for zero consumption. However, the current level of reporting is not identifying all potential exceptions for investigation (Inactive and vacant consumption) and not all zero consumption corrections are being applied.</p> <p>The impact is assessed to be medium but is unknown as to how much consumption is occurring due to zero consumption not being managed.</p> |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| <p>Vacant / Inactive consumption is now been actively worked and the report improved to remove unnecessary noise, based on some recommendation from this audit we will be looking to tweak this further to ensure it is effective</p> <p>We will work with our meter readers around improving the % of disconnection reads</p> | Oct 2022  | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| As above   |   |                        |

| Electronic meter readings and estimated readings   |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| Audit Ref: 9.6<br>With: Clause 17<br>Schedule 15.2<br><br>From: 01-Jul-21<br>To: 31-Jan-22   | Not all AMI meter event logs are reviewed to identify and investigate any that may affect the integrity of metering data.<br><br>Potential impact: Low<br><br>Actual impact: Low<br><br>Audit history: Once<br><br>Controls: Strong<br><br>Breach risk rating: 1 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                        |
| <b>Low</b>   | Controls of notified meter events are strong however not all AMI MEPs provide explicit emails notifying Genesis of a potential issue that may impact the accuracy of the AMI meter.  |                        |
| Actions taken to resolve the issue   | Completion date  | Remedial action status |
| We will review our current processes in relation to meter event and work with all our AMI MEPs to improve the reporting and ensure the required items are being investigated | Nov 2022   | Investigating          |
| Preventative actions taken to ensure no further issues will occur  | Completion date  |                        |
| As above   |  |                        |

| HHR aggregates information provision to the reconciliation manager                                    |  |                 |                        |
|---|--|-----------------|------------------------|
| Non-compliance  | Description  |                 |                        |
| Audit Ref: 11.4<br>With: Clause 15.8<br><br>From: 01-July-21<br>To: 31-Jan-22                         | Hau Nui Wind Farm ICPs 0696299004PC30D and 0696299005PCF48 are missing from the HHRAGGS file.<br><br>Potential impact: Low<br><br>Actual impact: Low<br><br>Audit history: Twice<br><br>Controls: Strong<br><br>Breach risk rating: 1  |                 |                        |
| Audit risk rating   | Rationale for audit risk rating  |                 |                        |
| <b>Low</b>  | The controls are rated as strong overall, but as a manual HHRVOLS (AV-090) file is created for these ICPs due to the data originating from Stark and there is no formal interface between Stark and Derive, no corresponding entries are added to the HHRAGGS or ICPDAYS file. |                 |                        |
| Actions taken to resolve the issue  |  | Completion date | Remedial action status |
| We will review this process and arrange for the above ICPs to be added to the HHRAGGS or ICPDAYS file |  | June 2022       | Investigating          |
| Preventative actions taken to ensure no further issues will occur                                     |  | Completion date |                        |
| As above  |  |                 |                        |

| Creation of submission information  |   |
|---|---|
| Non-compliance  | Description   |
| Audit Ref: 12.2<br>With: Clause 15.4<br><br><br>From: 01-July-21<br>To: 31-Jan-22 | <b>GENE and GEOL</b><br>Two ICPs with distributed generation reported in the 2021 audit, where no generation volumes were submitted for ICPs 0000011546HR322 and 0000029648HRF96 whilst GENE was the trader.<br>Two GENE ICPs identified in the 2020 audit which are believed to be generating which still do not have compliant metering installed or notification of gifting provided.<br>Some inactive consumption was missing from submissions because corrections had not been processed as soon as practicable.<br>Some defective meter corrections not conducted.<br>Consumption during bridged periods was missing from submissions because corrections were not processed as soon as practicable.<br>Rounding of UML load at ICP level in Derive to zero decimal places.<br>HHR volumes for day of disconnection not included in submission.<br>Backdated switches older than 14 months.<br><br><b>GENH</b><br>Unmetered load volumes submitted incorrectly under the GENE participant code.<br>Potential impact: Medium<br>Actual impact: Medium<br>Audit history: Twice<br>Controls: Moderate<br>Breach risk rating: 4 |
| Audit risk rating   | Rationale for audit risk rating   |
| <b>Medium</b>   | The controls are rated as moderate overall, but processing of corrections and bridged/stopped meters has room for improvement.<br>The impact is assessed to be medium due to: <ul style="list-style-type: none"> <li>the number of historic bridged/stopped meters identified but no correction performed in all instances, and</li> <li>some HHR volumes not submitted impacting seasonal shape values for all NHH traders.</li> </ul>   |

| Actions taken to resolve the issue  | Completion date                                | Remedial action status |
|---|--|------------------------|
| <p>The majority our submissions volume is based on actual consumption data, so we believe the impact of this noncompliance is low.</p> <p>Distributed Generation processes will be reviewed with a view to improvising the end-to-end process.</p> <p>The submission correction process around bridged / stopped meters, vacant consumption and faulty meters will be reviewed, and back-office functions audited to ensure the Market Settlements team are being advised of these.</p> | <p>Ongoing</p> <p>Nov 2022</p> <p>Dec 2022</p> | <p>Investigating</p>   |
| Preventative actions taken to ensure no further issues will occur   | Completion date                                |                        |
| <p>As above</p>   |  |                        |

| Accuracy of submission information   |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| Audit Ref: 12.7<br>With: Clause 15.12<br><br>From: 1/7/21<br>To: 22-Jan-22   | <b>GENE and GEOL</b><br>Some submission data was inaccurate and was not corrected at the next available opportunity.<br>Potential impact: High<br>Actual impact: High<br>Audit history: Twice<br>Controls: Moderate<br>Breach risk rating: 6  |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>High</b>  | The controls are rated as moderate overall as they are sufficient to ensure that most submission information is correct, but there is some room for improvement to the read and billing validation processes which identify and correct errors.<br><br>The impact is assessed to be high based on the proportion of corrections not carried against the sample checked. |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| The majority our submissions volume is based on actual consumption data, so we believe the impact of this noncompliance is low.<br>Distributed Generation processes will be reviewed with a view to improvising the end-to-end process.<br>The submission correction process around bridged / stopped meters, vacant consumption and faulty meters will be reviewed, and back-office functions audited to ensure the Market Settlements team are being advised of these. | Oct 2022  | Investigating          |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| As above   |   |                        |

| Permanence of meter readings for reconciliation   |  |                 |                        |
|---|--|-----------------|------------------------|
| Non-compliance  | Description  |                 |                        |
| <p>Audit Ref: 12.8</p> <p>With: Clause 4<br/>Schedule 15.2</p> <p>From: May 20 to Jul 20<br/>r14</p>  | <p><b>GENE and GEOL</b></p> <p>Some estimates were not replaced with permanent estimates by revision 14.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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>The controls are rated as moderate, because there are processes in place to attain readings by revision 14 and enter permanent estimate readings.</p> <p>The potential impact is rated as low. There are sound estimation processes, therefore I have recorded the audit risk rating as medium.</p> |                 |                        |
| Actions taken to resolve the issue  |  | Completion date | Remedial action status |
| Due to minimal impact the process around updating historic estimate to permanent estimates will be addressed as part of our billing platform change |  | TBC             | Identified             |
| Preventative actions taken to ensure no further issues will occur   |  | Completion date |                        |
| As above  |  |                 |                        |



| Reconciliation participants to prepare information   |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| Audit Ref: 12.9<br>With: Clause 2 of schedule 15.3<br><br>From: 01-Jul-21<br>To: 31-Jan-22                   | <b>GENH</b><br>Unmetered load volumes submitted incorrectly under the GENE participant code.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Strong<br>Breach risk rating: 1  |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| <b>Low</b>   | The controls are rated as strong as this a technical non-compliance and the only way Genesis can submit these volumes is as NHHVOLS. However, no NHHVOLS file is submitted for GENH.<br>The impact is assessed to be low as the volumes associated with these ICPs is minor. |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| We will also review the end-to-end process for Unmetered ICPs and look for process / compliance improvements |  | Jan 2023        | Identified             |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
| As above   |  |                 |                        |

| Forward estimate process   |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| <p>Audit Ref: 12.11</p> <p>With: Clause 4<br/>Schedule 15.3</p> <p>From: 01-Jul-21<br/>To: 31-Jan-22</p>   | <p><b>GENE and GEOL</b></p> <p>UML volumes have been rounded to zero decimal places prior to aggregation into AV-080 file.</p> <p>UML volumes reported as Forward Estimate (FE) rather than Historic Estimate (HE).</p> <p>Customer and photo reads are not validated against two previous actual reads but used in HE calculation.</p> <p>PV1 &amp; EG1 daily seasonal shapes not used for HE calculation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 they mitigate risk to an acceptable level.</p> <p>Customer and photo reads where used are not validated using two previous actual validated reads but have undergone reasonable checks as part of billing validations.</p> <p>Derive correctly calculates the UML volume however as Derive is a tool based around receiving meter reads and calculating consumption based on these meter reads it stores the consumption to zero decimal places.</p>  |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| We will also review the end-to-end process for Unmetered ICPs and look for process / compliance improvements   |  | Jan 2023        | Identified             |
| We will also review the process in relation to photo reads to see if improvements are possible   |  | Dec 2022        |                        |
| The rounding issue will be addressed as part of our Billing platform change. This is unlikely to be change prior to this due to the impact being extremely low |  | TBC             |                        |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
| TBC  |  |                 |                        |

| Forward estimate process  |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 12.12</p> <p>With: Clause 6<br/>Schedule 15.3</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>   | <p><b>GENE and GEOL</b></p> <p>The accuracy threshold was not met for some months and revisions, because forward estimate was too high or too low.</p> <p>Potential impact: High</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. The FSE process will ensure that forward estimate is consistent with the meter's historic consumption but does not take into account seasonality. The FDE process applies the same daily average to each meter register regardless of the number of meter registers installed or customer type and does not take into account seasonality.</p> <p>Initial data is replaced with revised data and washed up. A small number of submissions had differences over the threshold.</p> |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| We review the FE process on the back of the 2021 audit. This will be picked up as part of our billing platform change and is unlikely to be changed prior to this | TBC  | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| As above  |  |                        |

| <b>Compulsory meter reading after profile change</b>  |   |                               |
|---|---|-------------------------------|
| <b>Non-compliance</b>   | <b>Description</b>  |                               |
| <p>Audit Ref: 12.13</p> <p>With: Clause 7<br/>Schedule 15.3</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p> | <p><b>GENE and GEOL</b></p> <p>Validated meter reading or a permanent estimate not always applied where a profile change occurs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>   |                               |
| <b>Audit risk rating</b>  | <b>Rationale for audit risk rating</b>  |                               |
| <b>Low</b>  | <p>Controls are rated as moderate. Where the manual processes incorporate the inclusion of a meter read into derive as part of a bulk update of profile codes validated actual reads are appropriately applied. However, where the process relies on a manual entry of reads there is a risk of human error or failure to perform the task routinely as there are no QA checks performed in these instances.</p> <p>The risk rating is low as in the impact to settlement is minimal.</p> |                               |
| <b>Actions taken to resolve the issue</b>   | <b>Completion date</b>  | <b>Remedial action status</b> |
| We will review our processes for when a profile change occurs   | Aug 2022  | Investigating                 |
| <b>Preventative actions taken to ensure no further issues will occur</b>                                    | <b>Completion date</b>  |                               |
| TBC   |   |                               |

| Historical estimate reporting to RM  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>   | <p><b>GENE and GEOL</b></p> <p>Historic estimate thresholds were not met for some revisions.</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 because some improvements can be made to ensure compliance.</p> <p>GENE and GEOL were reasonably close to the target in all cases. The impact is minor; therefore, the audit risk rating is low.</p>          |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| <p>We are well above the parameters for the 3- and 7-month requirements and very close to the 14-month requirements</p> <p>Due to minimal impact the process around updating historic estimate to permanent estimates will be addressed as part of our billing platform change</p> | TBC   | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| As above   |   |                        |