

Compliance Plan for Sustainability Trust (SUST) - 2024

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 2.1 With: Clause 11.2 From: 01-Apr-22 To: 31-Mar-24 | A small number of late status and trader updates Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The non-compliance reported here related to a lack of training and a major system change during the audit period. Processes and systems have been updated to ensure status updates are done in a timely manner and average daily consumption has been corrected for some time now. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Registry reports on ICPs with inactive statuses will be run regularly to ensure these updates are not missed | | 21/05/2024 | |

| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| Audit Ref: 3.3 With: Clause 10 of Schedule 11.1 From: 01-Apr-22 To: 31-Mar-24 | A small number of late status and trader updates Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The team have noted the requirement, and updated processes. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Registry reports will be run regularly on all ICP's and statuses to ensure any delayed updates have been dealt with | | 21/05/2024 | |

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 3.5 With: Clause 3 of Schedule 11.1 From: 20-Sep-23 To: 30-Oct-23 | One late updates for change to the status "Active" and ANZSIC code Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Staff have now been trained to update the Registry on reconnection immediately, rather than wait for paperwork from the MEP. ANZSIC codes are updated as information comes to light. Generally Toast only gains 000000 – Residential codes but staff will take care to check and update the Registry data on a regular basis. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Regular reports will be run to validate Registry data | | 21/05/2024 | |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 4.2 With: Clause 3&4 of Schedule 11.1 From: 01-Apr-22 To: 31-Mar-24 | <ul style="list-style-type: none"> • Some ANs had the AA response code incorrectly applied. The AD (advanced metering) response code was expected for ICP metered by advanced meters • 10 AN file were late Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| SUST were not aware of this requirement but have since updated processes to include the correct response code for AN's depending on meter type. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Switch Breach report is run on a regular basis | | 21/05/2024 | |

| Non-compliance | Description | | |
|--|--|-----------------|------------------------|
| Audit Ref: 4.3 With: Clause 5 of Schedule 11.3 From: 01-Apr-22 To: 31-Mar-24 | <ul style="list-style-type: none"> • Incorrect calculation of average daily consumption (AMI reads) recorded in CS files • 5 late CS files Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that should be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We encountered a small number of incorrectly calculated average daily consumption reads due to a system error, which has since been fixed and resolved quite some time ago. Late CS are rare and would be due to resourcing at the time. We run the switch breach process every day so this doesn't happen anymore. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Switch breach report is run daily. | | 21/05/2024 | |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 4.8 With: Clause 10(1) of Schedule 11.3 From: 01-Apr-22 To: 31-Mar-24 | <ul style="list-style-type: none"> • Some ANs had the AA code incorrectly applied. The AD response code was expected for ICP metered by advanced meters • One AN files were late • For 3 switches, SUST proposed a switch date, which was one day before a proposed date by a gaining trader • 6 CS files were late Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that should be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| SUST were not aware of the response code rule but have since updated processes to rectify. At times customers preferred switch dates are different from the gaining trader. SUST have now updated their processes to ensure correct workflow is followed | | 20/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Switch Breach report run regularly | | 21/05/2024 | |

| Non-compliance | Description | |
|---|---|------------------------|
| Audit Ref: 4.9 With: Clause 10(2) of Schedule 11.3 From: 02-Apr-23 To: 13-Apr-23 | For 2 switches , AN file was not send advising that the proposed event date was not accepted. Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | Controls are recorded as strong. It was only two ICPs identified, appears that it was misunderstanding/lack of training. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Processes have been updated and staff training in this area. | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| | | |

| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| Audit Ref: 4.10 With: Clause 11 of Schedule 11.3 From: 01-Apr-22 To: 31-Mar-24 | <ul style="list-style-type: none"> • Incorrect calculation of average daily consumption (AMI reads) recorded in CS files • 5 late CS files Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that should be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Processes have been updated for the above | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
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| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| Audit Ref: 4.15 With: Clause 17 of Schedule 11.3 From: 10-Oct-22 To: 30-May-23 | <ul style="list-style-type: none"> • Two NW files were sent after 2 calendar months • 6 AW files were late Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that should be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| NWs were sent after an ICP mix up was discovered and customer billing had to be rectified. These NWs were done in conversation with customer and agreed by other retailer. | | 21/05/2024 | Disputed |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| NW's will not be sent post 2 month mark | | 21/05/2024 | |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 6.6 With: Clause 5 of Schedule 15.2 From: 01-Apr-22 To: 31-Mar-24 | Manual read process does not meet the obligation specified in clause 5 (b)(d)(e) of Schedule 15.2. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes in place that should be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |

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|--|-------------------------------|----------|
| <p>Our preferred method of manual read is via photo</p> <p>5 Non half-hour metering information</p> <p>A reconciliation participant must, when manually interrogating a non half-hour metering installation, if the relevant parts of the metering installation are visible and it is safe to do so,—</p> <p>(a) obtain the meter register value; and</p> <p>(b) ensure seals are present and intact; and</p> <p>These are visible on photo reads when they are able to be seen</p> <p>(c) check for phase failure if the meter supports it; and</p> <p>(d) check for signs of tampering or damage; and</p> <p>In as much as a visual inspection can determine this these are visible on photo reads when they are able to be seen</p> <p>(e) check for electrically unsafe situations, where “electrically unsafe” has the meaning given to it in the Electricity (Safety) Regulations 2010</p> <p>In as much as a visual inspection can determine this these are visible on photo reads when they are able to be seen</p> <p>The photos received for reads have sufficiently</p> | | Disputed |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |
| <p>Our meter reading methods surpass the requirements and results obtained by manual meter reading contractors (who are unwilling to offer their services), we do not believe this finding is realistic</p> | | |

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 6.10 With: Clause 9(1) of Schedule 15.2 From: 01-Jan-23 To: 31-Jul-23 | 90% attainment was not achieved for 2 NSPs over 2 months Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as strong. There are processes in place. Only two ICPs not read over 2 months in two years. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The manual meter read process has been improved some time ago and since the audit we have strengthened our processes and controls further. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| The process will be reviewed by management to ensure meters are read within compliance timeframe | | 21/05/2024 | |

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 11.3 With: Clause 15.7 From: 01-Apr-22 To: 31-Mar-24 | BILLED file is not aggregated by invoice month Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | There are no controls. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low because BILLED file is not used by RM. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| SUST will supply the Reconciliation Agent with a monthly report of billings from the previous month. | | 21/05/2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: 01-Nov-22 To: 30-Sep-23 | Historical estimates target not met for revisions 3 for a few months Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. There are processes of manual reads could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| | | | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| 1) The R3 result were caused by a very small number of icps on POCs with a small total no of icps This is merely symptomatic of a retailer with a growing customer base entering new areas, other than increasing our manual reading (which we already have done) no corrective action is warranted | | | |