

Compliance Plan for The Power Company (TPCO) - 2024

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 2.1 With: 11.2(1) and 10.6(1) From: 01-Feb-23 To: 31-Mar-24 | A relatively small quantity of information in the registry was inaccurate, it was spread broadly across all PowerNet networks ELIN, TPCO, LLNW, OTPO. Potential impact: Low Actual impact: Low Audit history: Many times previously Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. The audit risk rating is assigned as low due to the relatively low number of ICPs involved. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Continual development of PowerNet Connect and additional support reporting to monitor these details and work towards resolving the issue. Use of the Audit Compliance Report to help monitor these issues, this will be run monthly. | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As Above | | Ongoing | |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1 From: 01-Feb-23 To: 31-Mar-24 | TPCO – 0.89% of IECD input to Registry late Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as strong. The ICP connection management system and processes applied have demonstrated improved results. They are consistent across networks. The audit risk rating is assigned as low due to minimal impact on settlement outcomes. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Creation of PowerNet Connect Dashboard that identifies “ACTIVE” ICPs without IECD is updated and monitored daily. This is available to all Operators who enter this data. We are pleased with the improvement in this area but continue to strive for Compliance. | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As above | | Ongoing | |

| Non-compliance | Description | | | |
|---|--|-----------------|------------------------|--|
| Audit Ref: 4.1 With: Clause 8 of Schedule 11.1 From: 01-Feb-23 To: 31-Mar-24 | Registry information not updated within 3 business days by all PowerNet Distribution Networks ELIN, TPCO, LLNW, OTPO Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Moderate Breach risk rating: 2 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | Controls are recorded as moderate, in majority cases the registry is updated within timeframe specified by the Code. The audit risk rating is assigned as low due to minimal impact on settlement outcomes. | | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| Use of the Audit Compliance Report to help monitor these issues, which will be run and monitored monthly. | | Ongoing | Identified | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | | |
| Use of the Audit Compliance Report to help monitor these issues, which will be run and monitored monthly. | | Ongoing | | |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 4.4 With: clause 2 of Schedule 11.1 From: 01-Feb-23 To: 31-Mar-24 | 37 ICPs with duplicate addresses Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as moderate. The reason for this non-compliance is recognised and remedial action will be implemented. The audit risk rating is assigned as low due to minimal impact on settlement outcomes. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The Audit Compliance Report and PowerNet Connect reporting will be used to identify duplicate addresses. There are several historic ones that require us finding out from the customers of both ICP's if they are for Flats, for example, so that the address can be updated accordingly. We rely on the Retailers supplying customer contact information or contacting their customers directly to achieve this. Some headway has been made since the Audit was undertaken and this will continue to be worked on. | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As above. | | Ongoing | |

| Non-compliance | Description | | |
|--|--|-----------------|------------------------|
| Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1 From: 01-Feb-23 To: 31-Mar-24 | No IECD entry for 2 ICPs Potential impact: Low Actual impact: Low Audit history: Many times previously Controls: Strong Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are recorded as strong. PowerNet depends a lot on timeliness of information provided by the third parties. The audit risk rating is assigned as low with minimal impact on settlement outcomes. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| PowerNet Connect Dashboard identifies "ACTIVE" ICPs without IECD is updated and monitored daily. This is available to all Operators who enter this data. | | | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| PowerNet will look into why there was a failure of the system in this instance. | | | |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref 6.8 With: 10.25(1) From: 27-May-23 To: 31-Mar-24 | TPCP/ELIN - Installation certification of LEV0331 expired on 27/05/23 Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Medium | Controls are recorded as weak. The audit risk rating is assigned as medium because certification for LDEV033 (installation category 5) expired one year ago. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| This has now been rectified and we now hold a Certificate of Compliance from 21 may 2024 until 21 May 2027. | | 21/05/24 | Cleared |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| A "task" has been set up for Audit Compliance in our Promapp system so that this is checked before the certification expiry date. | | 21/05/24 | |

| Recommendation | Description | Audited party comment | Remedial action |
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| <p>Review process of uploading new ICPs to the registry. Create a consistent process what date is used as the Effective Date in the registry</p> | <p>It appears that in some instances when a new ICP identifier is firstly uploaded to the registry, the Creation Date is uploaded to the registry, not the Trader Authority Date field. This leads to incorrect information in the registry and increases the number of backdated entries which impacts PowerNet compliance</p> | <p>Agree with recommendation.</p> | <p>PowerNet are looking to move from the PowerNet Connect database to an updated ARC database this Financial Year which should allow us to improve our compliance in this area as it appears that, in some instances, the incorrect date is being pulled through from our Database to the Registry.</p> |
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| Recommendation | Description | Audited party comment | Remedial action |
|---|---|-----------------------------------|--|
| <p>Record ROI date as the Effective Date for population of distributed generation information in the registry</p> | <p>The Input Date is recorded as the Effective Date for embedded generation</p> | <p>Agree with Recommendation.</p> | <p>Use ROI date as the Effective Date for population of distributed generation information in the registry</p> |