

Compliance Plan EA Networks Distributor 2024

| Requirement to provide complete and accurate information | | |
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| Non-compliance | Description | |
| <p>Audit Ref: 2.1 With: Clause 11.2(1)</p> <p>From: 29-Nov-22 To: 22-Feb-24</p> | <p>Incorrect effective dates for initial electrical connection date events recorded in the registry for two ICPs.</p> <p>One LE ICP with the incorrect NSP dedication flag of “N”.</p> <p>Five of a sample of seven from 148 decommissioned ICPs had an incorrect decommissioning date recorded on the registry.</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 | |
| Low | <p>The controls are recorded as moderate as while EA Networks has robust processes to identify discrepancies and most corrections are made promptly there is room for improvements to ensure accuracy of event dates.</p> <p>The audit risk rating is low as the errors found have a minor effect on reconciliation.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>The two initial energisation date errors have been investigated and corrected, and all other initial energisation dates that do not match the Trader’s initial “active” status date have been checked.</p> <p>The LE ICP dedicated NSP flag has been corrected to “Y”</p> <p>The five incorrect decommissioning dates have been corrected, and all other decommissioning events where the decommission date matches the date the transaction was entered have been checked and corrected where necessary.</p> | June 2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | Completion date | |

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| <p>EA Networks has added checking criteria to its daily checking process to:</p> <ul style="list-style-type: none"> • Identify initial electrical connection dates that do not match initial active dates applied by the Trader, and • Identify situations where decommissioning events are dated on the same day they are processed (as updating the default effective date was identified as the main cause of the issue). <p>EA Networks has also removed the default date from the registry maintenance function in Salesforce to ensure that the user is prompted to consider the date.</p> <p>The single LE ICP with an incorrect NSP dedication flag of N has been corrected. Any future LE ICPs will be set up using the existing one as a template, so further non-compliance is not expected to occur.</p> | <p>June 2024</p> | |
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| Timeliness of Provision of Initial Electrical Connection Date | | |
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| Non-compliance | Description | |
| Audit Ref: 3.5 With: Clause 7(2A) of schedule 11.1 From: 29-Nov-22 To: 22-Feb-24 | 16 late initial electrical connection date updates. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | I have recorded the controls as strong in this area as EA Networks has checks in place to identify and resolve discrepancies and the number of late updates was low. The audit risk rating is assessed to be low as this has no direct impact on reconciliation. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| All issues identified where the result of backdated entries or corrections applied prior to the audit being carried out – although updates were late, no further remedial changes are required. | N/A | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| EA Networks has addressed the system errors that were preventing timely updates, and taken the opportunity to provide additional staff training on the processes with the aim of improving update times. Where discrepancy checking detects non-compliance, these will be followed up at the time in order to catch non-compliance quickly, and address systematic problems sooner. | June 2024 | |

| Changes to registry information | | |
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| Non-compliance | Description | |
| <p>Audit Ref: 4.1 With: Clause 8 of schedule 11.1</p> <p>From: 01-Nov-22 To: 15-May-24</p> | <p>248 late address updates. 14 late status updates. Ten late NSP updates. 108 late updates of distributed generation information.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>I have recorded the controls as strong in this area as EA Networks has checks in place to identify and resolve discrepancies and the number of late updates was low.</p> <p>There is a minor impact on participants with late updates. The audit risk rating is low.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| No remedial action taken – updates were late but not incorrect. | N/A | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| <p>System changes have been made to prevent or reduce the occurrence of late updates - default dates have been removed (preventing updates acquiring the date of the previous event update) and during the audit period, a feature was added asking the user for a reason if updates are backdated more than 3 days.</p> <p>Distributed generation updates are often reliant on information being returned by external parties that are not bound by the Code, and we have limited ability to enforce provision of the information. We will continue to monitor:</p> <ul style="list-style-type: none"> Recorded export Metering upgrades to export metering Export reconciliation profiles Electricity high risk register <p>for indications that generation has been installed, and will follow up with installers and property owners where relevant.</p> | June 2024 | |

| Distributors to Provide ICP Information to the Registry manager | | |
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| Non-compliance | Description | |
| <p>Audit Ref: 4.6</p> <p>With: Clause 7(1)(o) of Schedule 11.1</p> <p>From: 01-Nov-22</p> <p>To: 15-May-24</p> | <p>Incorrect effective dates for initial electrical connection date events recorded in the registry for two ICPs.</p> <p>One LE ICP with the incorrect NSP dedication flag of “N”.</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 | |
| Low | <p>The controls are recorded as strong, because of the low number of inaccuracies identified.</p> <p>The audit risk rating is low as the errors found have a minor effect on reconciliation.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>The LE ICP NSP Dedication flag (for the unused embedded network ICP) was corrected to “Y” at the time of the audit. All EA Networks’ ICPs <u>are</u> dedicated to the NSP from which they are supplied and the Code requires this to be recorded as “N”, except for LE ICPs where the code requires this to be recorded as “Y”.</p> <p>The initial energisation dates that were found to be incorrect have been corrected.</p> | May 2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| <p>Any future LE ICPs will use the existing LE ICP as a template, and acquire the “Y” indication for the dedicated NSP flag.</p> <p>System changes have been made to ensure that subsequent updates to the registry network event retain the original initial energisation date. Default dates have also been removed to prompt the user to consider the date being applied for the registry update.</p> | June 2024 | |

| Provision of information to registry after the trading of electricity at the ICP commences | | |
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| Non-compliance | Description | |
| Audit Ref: 4.7 With: Clause 7(3) of schedule 11.1 From: 23-Aug-23 To: 04-Jun-24 | Actual price category code was updated later than ten business days after trading commenced for three ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are recorded as strong as the EA Networks process normally ensures the actual price code is updated within ten business days. The audit risk rating is recorded as low as only three ICPs were affected. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Missing information found in the audit has been corrected. | April 2024 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Salesforce job flow has been corrected to ensure that jobs are automatically moved to the next step in the process which will eliminate the majority of the delays observed. | June 2024 | |

| Management of “decommissioned” status | | |
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| Non-compliance | Description | |
| Audit Ref: 4.11 With: Clause 20 of schedule 11.1 From: 01-Nov-22 To: 15-May-24 | Five of a sample of seven from 148 decommissioned ICPs had an incorrect decommissioning date recorded on the registry. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are recorded as moderate as while the decommissioning processes are strong there is room for improvements to ensure accuracy of event dates. The impact is assessed to be low as there is no impact on reconciliation. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| All decommissioning dates in the audit period have been reviewed and corrected. | April 2024 | Cleared |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| The incorrect decommission dates were found to have occurred where a default date (the current date) was used during the registry update process. The default date has been removed from Salesforce to ensure that the user considers the date being used for the event update. Further staff training has also been undertaken to ensure the correct decommission date is considered when processing these. | June2024 | |