

## Compliance plan for Unison Networks Ltd, DIST 2024

Requirement to provide complete and accurate information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11.2(1) and 10.6(1)  From: 02-Feb-23 To: 22-Apr-24	Not all practicable steps are taken to ensure that the information provided is complete and accurate.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The registry discrepancies processes are robust, and the number of discrepancies was low.  The audit risk rating is assessed to be low as this doesn't have any direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Not Applicable	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with our information technology team to identify any potential automated controls.	To be determined based on the complexity of any solution.	

<b>Timeliness of Provision of ICP Information to the registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.4 With: Clause 7(2) of Schedule 11.1 From: 02-Feb-23 To: 22-Apr-24	Registry not updated prior to commencement of trading for one ICP. Potential impact: Low Actual impact: Low Audit history: Four times previously Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong as there are robust controls in place. The audit risk rating is low as this affected only one ICP and it was updated one business day after electrical connection	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Not Applicable	N/A	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Continued education and communication with authorised contractors.	Ongoing	

<b>Timeliness of Provision of Initial Electrical Connection Date</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: Clause 7(2A) of Schedule 11.1  From: 02-Feb-23 To: 22-Apr-24	Late population of the initial electrical connection date for some ICPs (unable to determine exact number as report includes some invalid ICPs).  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Strong  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong as there are robust controls in place to ensure these are populated on time and correctly.  The potential impact is low as the estimated number of late updates is low as proportion of the total ICPs electrically connected.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Not Applicable	N/A	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Continued education and communication with authorised contractors to have the required paperwork in time to meet requirements	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 8 Schedule 11.1</p> <p>From: 02-Feb-23</p> <p>To: 22-Apr-24</p>	<p>One late pricing update of a sample of 20 price updates checked.</p> <p>282 late decommissioning status updates.</p> <p>Four late network event updates.</p> <p>31 late distributed generation updates.</p> <p>4,147 late NSP changes.</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>The controls are recorded as moderate overall as they will mitigate risk most of the time.</p> <p>The audit risk rating is assessed to be low as this doesn't have any direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Not Applicable	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Although we have had significant improvement to last year we will continue to identify opportunities (process or technology) to improve this.	Ongoing	

Notice of NSP for each ICP			
Non-compliance	Description		
Audit Ref: 4.2 With: Clauses 7(1),(4) and (5) Schedule 11.1 From: 02-Feb-23 To: 22-Apr-24	Five ICPs with an incorrect NSP recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate as there is room for improvement. The audit risk rating is low as only five ICPs were found to be mis-mapped and none were in the incorrect balancing areas.		
Actions taken to resolve the issue		Completion date	Remedial action status
Completed - Ongoing discrepancy reporting		30/06/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to raise service issues with Information Technology and our internal systems.		30/03/2025	

ICP location address		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 2 of Schedule 11.1 From: 02-Feb-23 To: 22-Apr-24	Four 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	
<b>Low</b>	Controls are rated as moderate as there is room for improvement with the ICP creation process. The audit risk rating is low as no “active” ICPs were found with duplicate addresses.	
Actions taken to resolve the issue	Completion date	Remedial action status
Not Applicable	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue completing checks in the current process and identify any potential system improvements	Ongoing	

<b>Distributors to Provide ICP Information to the Registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 4.6 With: Clause 7(1) Schedule 11.1</p> <p>From: 02-Feb-23 To: 22-Apr-24</p>	<p>Two ICPs recorded with distributed generation but this is yet to be installed identified via late distributed generation updates.</p> <p>Five of a sample of ten ICPs with distributed generation recorded with the incorrect event date.</p> <p>Four of a sample of ten ICPs recorded with distributed generation but this has yet to be installed.</p> <p>Two temporarily electrically connected ICPs with the incorrect initial electrical connection dates recorded.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are recorded as moderate overall as there is room for improvement in the accuracy of distributed generation.</p> <p>The impact on settlement and participants is assessed to be low as overall the information populated to the registry has a high level of accuracy.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p>Update the current process to clarify the 'generation date' to be input in Gentrack as the date of installation. Run exception reporting where no paperwork has been received and follow up on the date of installation</p>	15/08/2024	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Identify any potential system or process or system improvements	Ongoing	