

Compliance plan for Flick Energy Limited 2021

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 16-Nov-20</p> <p>To: 02-Nov-21</p>	<p>Some registry data is incorrect.</p> <p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate. At least eight ICPs did not have estimates generated because there was insufficient history for Telemetry to create an estimate.</p> <p>Seven ICPs had consumption recorded on a date with inactive status.</p> <p>Two ICPs had HHY profile applied for longer than the maximum period allowed under the approved profile application.</p> <p>Flick did not provide their best estimate for three ICPs where trading period consumption was estimated using a flat profile.</p> <p>IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date.</p> <p>Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly. The impact is assessed to be low, as updated data will mostly be provided through the revision process once actual data is received.</p>	
Actions taken to resolve the issue		Completion date
<p>HHY event dates has been corrected for the 6 impacted ICPs.</p> <p>The smart meter program has been discontinued which will now eliminate the issue of HHY profile being used longer than the maximum period. If this program is reinstated, then we would ensure that the HHY profiles are only used for the allowed maximum period of 16 weeks.</p> <p>25.007 units of inactive consumption has now been added to our system to be reconciled to the market through revision submission.</p>		15/11/2021
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A process change has been implemented where data will be estimated using a non-flat profile (fluctuating half hour data) for all ICP's requiring manual data estimation.</p> <p>ARC meters are currently in the process of being displaced so the issue of interval data being received to one decimal place will ultimately be eliminated. In the meantime, we will engage with AMS and explore any temporary solution to this.</p> <p>We will also engage with ARCs to find a resolution for replacement data to be provided for event dates which pass the 15 day mark.</p> <p>Our internal process has been changed to reflect inactive status in registry 1 day after the date of disconnection/decommission to enable the inactive consumption to be captured.</p>	Ongoing	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 13-Jan-21</p> <p>To: 14-May-21</p>	<p>Three ICPs did not have their meters certified on reconnection.</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>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong, because Flick identifies uncertified meters as part of their safety net checks and follows up uncertified meters with the MEP.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Remedial action status
All three ICPs mentioned above had issues which were out of our control and only the MEPs could have resolved this. We identified that these ICPs required certification through our safety net check and escalated these to the MEP's.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	Identified
As stated above we can only identify and escalate all uncertified ICPs to the MEP's. We are dependent on the MEP's on re-certifying the sites.	ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Nov-20 To: 31-Aug-21</p>	<p>85 late status updates to active status.</p> <p>Ten late status updates to inactive status.</p> <p>177 late trader updates.</p> <p>53 late ANZSIC code updates for new connections or switch ins.</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 they are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement.</p> <p>The risk is low as most updates were completed on time or soon after they were due, unless they were backdated corrections.</p>	
Actions taken to resolve the issue		Completion date
<p>Most of the late trader updates and status updates were due to the inability to update registry while an ICP is in switch. This issue needs to be resolved through the Switch process review process by the authority.</p> <p>Late ANZSIC codes update cannot be fully resolved as this is dependent on customers advising us of correct ANZSIC when signing up. The non-compliance is due to the backdated date used to correct registry records. If current date was used to update the ANZSIC code, then incorrect records will be reflected in the registry.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>A robust training has been completed on trader and status updates on 18/11/2021.</p> <p>The registry status and trader update process will be monitored and assessed through the monthly compliance report and quarterly Field internal audit.</p>		18/11/2021
		Identified

Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 27-Oct-21</p> <p>To: 02-Nov-21</p>	<p>The MEP was notified of the decommissioning of ICP 0001381020PC55D six days after the decommissioning date.</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>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are strong because the MEP is normally advised of decommissioning through a service order issued before decommissioning is completed. Late notification occurred because the network advised Flick of the decommissioning after it had occurred. Flick notified the MEP on the day they received the notification from the network, and the impact is assessed to be low.</p>	
Actions taken to resolve the issue		Completion date
This was out of Flick's control as the network advised us of the decommission after it had been completed. The house was relocated without Flick's knowledge.		18/11/2021
Preventative actions taken to ensure no further issues will occur		Completion date
The network in question has been advised to notify Flick of their intention to decommission an ICP prior to decommission so that arrangement can be made with MEP's for meters to be removed from site.		18/11/2021
Remedial action status		
Identified		

Provision of information to the registry manager	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 05-Nov-20</p> <p>To: 08-Jul-21</p>	<p>Five late status updates for new connections.</p> <p>ICP 0007198487RN3F4 had its active status date recorded as 02/11/20 instead of 05/11/20 and was corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong, because the late updates decreased as the audit period progressed and one data discrepancy was identified.</p> <p>The impact is assessed to be low, based on the ICPs affected and number of days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A robust training has been completed on new connection updates on 18/11/2021.		18/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The registry new connection status updates is going to be monitored through the weekly Safety Net report and monthly compliance report.		Ongoing	

ANZSIC codes			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 15-Mar-19</p> <p>To: 02-Nov-21</p>	<p>The ANZSIC code for 0001202483TU4A7 was recorded as D281100 water supply but should be I530900 - Other Warehousing and Storage Services. The code was corrected during the audit.</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>Controls are strong because good validation is in place and only one exception was identified.</p> <p>There is no impact on other participants or settlement, but there is a minor impact on the Authority because this information is used for reporting.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Registry has been updated with the correct ANZSIC code.		12/11/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>We cannot fully avoid re-occurrence of this issue as we are dependent on our customers in correctly identifying their end use during sign up.</p> <p>ANZSIC validation report is run monthly to identify ANSZIC code discrepancies.</p>	Ongoing	
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Management of "active" status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 11.18</p> <p>From: 14-Dec-18</p> <p>To: 05-Nov-21</p>	<p>ICPs 0000010228MLB36 and ICP 0007198487RN3F4 had incorrect active status dates which were corrected during the audit.</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	
Low	<p>Controls are rated as moderate, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed.</p> <p>The impact is low because there was a small difference between the correct and applied dates, and the errors were corrected during the audit.</p>	
Actions taken to resolve the issue		Completion date
A robust training has been completed on 18/11/2021 on status update through reconnection .		18/11/2021
Preventative actions taken to ensure no further issues will occur		Completion date
The registry status update through re-connection is going to be monitored through the weekly Safety Net report and monthly compliance report.		Ongoing

Management of "inactive" status			
Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 16-Nov-20</p> <p>To: 02-Nov-21</p>	<p>ICPs 0387281169LC942 and 0420349359LCF6E had incorrect disconnection records on the registry which were corrected during the audit.</p> <p>Seven ICPs had consumption recorded on a date with inactive status.</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>Controls are rated as moderate, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed.</p> <p>There is a small impact because consumption during inactive periods is excluded from submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The incorrect disconnection records mentioned above has been corrected in registry.</p> <p>25.007 units of inactive consumption has now been added to our system to be reconciled to the market through revision submission.</p>		17/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our internal process has been changed to reflect inactive status in registry 1 day after the date of disconnection/decommission. This will enable the inactive consumption to be captured and reconciled to the market.</p>		18/11/2021	

Losing trader must provide final information - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p>	<p>Two CS breaches for transfer switches.</p> <p>At least four transfer CS files contained average daily kWh inconsistent with the requirements of the registry functional specification.</p> <p>Seven CS files had an incorrect last actual read date.</p> <p>Three CS files had an incorrect read type.</p> <p>Three CS files had an incorrect CS event read.</p>

<p>From: 23-Dec-20</p> <p>To: 10-Aug-21</p>	<p>0005263689RN1D2 had an incorrect switch event date applied and was corrected through the withdrawal process.</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 overall. At least 75% of switches are created automatically by the provisioning system. No discrepancies between read types and last actual read dates were identified for automatically generated files, and the sample of files checked were accurate apart from average daily kWh, which was calculated based on the previous month, rather than previous actual read to read period. Where files were manually created there were some errors in:</p> <ul style="list-style-type: none"> last actual read dates, where they contained typos or the last day of supply was selected instead of the last actual reading, some read types were incorreced keyed, and some readings were incorrect because the wrong read was entered for the meter, the reading for the wrong date was selected or a typo was made when entering the reading. <p>The audit risk rating is low overall:</p> <ul style="list-style-type: none"> most Flick ICPs have communicating AMI meters and the gaining retailer is likely to receive actual readings soon after the ICP switches in, reducing the likelihood of forward estimate being calculated from the average daily kWh value (in most cases the average daily kWh provided was a reasonable estimate of the ICP's consumption), the last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on submission, all switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact, the only large difference between the correct and applied event reading was resolved through the RR process; the impact of the other discrepancies is minor, and the incorrect switch event date was corrected through the withdrawal process and the impact is low. 		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We apply the average for the last 30 days while calculating average consumption in the CS file instead of the last read to read period as we gain actual reads daily. We would not reflect the true estimated value for the average consumption if we followed the rules stated in the registry functional specification v22.21. We are waiting for this to be resolved by the authority through the Switch process review.</p>		18/11/2021	Identified

A robust refresher training on the CS file submission data which included event dates, read types, read and average daily consumption has been completed on 18/11/2021.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The submission of the CS file contents will be assessed and monitored through the scheduled monthly compliance reporting and quarterly Switch internal audits.</p> <p>We intend to automate the remaining 25% of switch outs. This will eliminate the manual errors identified above.</p>	Ongoing	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 23-Apr-21</p> <p>To: 30-Jul-21</p>	<p>Three RR breaches.</p> <p>Switch event readings for 0006880711RN2DA (12/03/2021) and 0007000499RN46A (27/04/2021) were recorded as estimates in Telemetry but should have been actual.</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 rated as moderate, because:</p> <ul style="list-style-type: none"> most RR and AC files were issued on time, and the delays were caused by waiting for metering information, and the manual process to update Telemetry where an RR is rejected normally ensures that the correct read type is applied. <p>The impact is low because the read type differences have no impact on submission, and the late files have a minor impact on other participants.</p>	
Actions taken to resolve the issue		Remedial action status
The read type for both ICP's mentioned above has been corrected in Telemetry.		18/11/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Robust training has been provided to the team on the RR process on 18/11/2021.</p> <p>RR process will be monitored through monthly compliance reporting and quarterly switch internal audits.</p>		Ongoing

Losing trader provides information - switch move			
Non-compliance	Description		
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 04-Dec-20 To: 12-Aug-21	13 ET breaches for switch moves. Two E2 breaches for switch moves. Five ANs did not have the correct AN response code applied. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. A small number of errors occurred, mainly for manually generated files. The impact is assessed to be low because the switches were completed as expected, and the E2 breaches were close to the expected dates.		
Actions taken to resolve the issue		Completion date	Remedial action status
Re-training has been provided to the switch team on 18/11/2021 on the AN process.		18/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The AN process will be monitored through monthly compliance reporting and quarterly switch internal audits.		Ongoing	

Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 23-Dec-20 To: 10-Aug-21	At least six CS files contained average daily kWh inconsistent with the requirements of the registry functional specification. 12 CS files had an incorrect last actual read date. Four CS files had an incorrect read type. Three CS files had an incorrect CS event read. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate overall. At least 75% of switches are created automatically by the provisioning system. No discrepancies between read types and last actual read dates were identified for automatically generated files, and the sample of files checked were accurate apart from average daily kWh, which was calculated based on the previous month, rather than previous actual read to read period. Where files were manually created there were some errors in:</p> <ul style="list-style-type: none"> last actual read dates, where they contained typos or the last day of supply was selected instead of the last actual reading, some read types were incorreced keyed, and some readings were incorrect because the reading for the wrong date was selected, or a typo was made when entering the reading. <p>The audit risk rating is low overall:</p> <ul style="list-style-type: none"> most Flick ICPs have communicating AMI meters and the gaining retailer is likely to receive actual readings soon after the ICP switches in, reducing the likelihood of forward estimate being calculated from the average daily kWh value (in most cases the average daily kWh provided was a reasonable estimate of the ICP's consumption), the last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on submission, all switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact, and the impact of the discrepancies between the correct and applied event readings is minor. 		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We apply the average for the last 30 days while calculating average consumption in the CS file instead of the last read to read period as we gain actual reads daily. We would not reflect the true estimated value for the average consumption if we followed the rules stated in the registry functional specification v22.21. We are waiting for this to be resolved by the authority through the Switch process review.</p> <p>A robust refresher training on the CS file submission data which included event dates, read types, read and average daily consumption has been completed on 18/11/2021.</p>		18/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The submission of the CS file contents will be assessed and monitored through the scheduled monthly compliance reporting and quarterly Switch internal audits.</p> <p>We intend to automate the remaining 25% of switch outs. This will eliminate the manual errors identified</p>		Ongoing	

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: 19-Apr-21</p> <p>To: 12-May-21</p>	<p>Two RR breaches for switch moves.</p> <p>Three RRs had the incorrect read recorded in Telemetry and were corrected by re-issuing an RR which was accepted during the audit.</p> <p>Potential impact: Low</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, because:</p> <ul style="list-style-type: none"> most RR files were issued on time, and the delays were caused by waiting for metering information, and the manual process to update Telemetry where an RR is rejected normally ensures that the correct read type is applied. <p>The impact is low because the agreed switch readings were confirmed and applied through the RR process and there is no impact on submission, and the late files have a minor impact on other participants.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Read recorded in Telemetry for 3 ICP's mentioned above were corrected after RR's reissued were accepted.		12/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Robust training has been provided to the team on the RR process on 18/11/2021.</p> <p>RR process will be monitored through monthly compliance reporting and quarterly switch internal audits.</p>		ongoing	

Withdrawal of switch requests	
Non-compliance	Description
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 12-Jan-21</p> <p>To: 21-May-21</p>	<p>Nine NA breaches.</p> <p>Four NWs were issued for the wrong ICPs and rejected by the other trader.</p> <p>The NW for 0000064496TR28F (09/03/21) should have been issued with advisory code WS (wrong switch type) instead of WP (wrong premises).</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 because the files are processed manually. The incorrect withdrawals were manually created, and the late files were delayed while Flick confirmed that the NWs were required.</p> <p>The audit risk rating is low because a small number of files were affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The 2-month timeframe allowed for the switch withdrawals is not reasonable and does not meet customer requirements in some instances. We action withdrawal requests as soon as we are made aware of an incorrect sign up or a need for a switch withdrawal.		18/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Re-training has been provided to the switch team on 18/11/2021 on the withdrawal process.</p> <p>The withdrawal process will be monitored through monthly compliance reporting and quarterly switch internal audits.</p>		ongoing	

Metering information			
Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 21</p> <p>Schedule 11.3</p> <p>From: 12-Dec-20</p> <p>To: 04-Aug-21</p>	<p>For six CS files issued by Flick, the switch event readings did not reflect the actual reading or estimated reading on the last day of supply.</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 moderate, all the incorrect readings were in manually created CS files and most CS files are generated automatically by the provisioning system.</p> <p>The audit risk rating is low, based on the kWh difference and that the largest difference was resolved through the RR process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Retraining has been provided to the switch team on the submission of read through the CS file and updating telemetry with the CS accepted read where applicable.		18/11/2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
The submission of read through the CS file and telemetry updates will be monitored through the monthly compliance reporting and quarterly switch internal audits.	Ongoing	

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13 and clause 15.2</p> <p>From: 20-Nov-19</p> <p>To: 15-Jul-20</p>	<p>Eight bridged meters were identified during the audit period. Energy was not quantified in accordance with the code during the bridged periods.</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		
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time. Bridging only occurs where a soft reconnection cannot be performed after hours, and the customer urgently requires their energy supply for health and safety reasons. Corrections are processed to estimate consumption during bridged periods.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A process change has been implemented where data will be estimated using a non-flat profile (fluctuating half hour data) for all ICP's requiring data estimation for the bridged period.		12/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The bridged period data estimation will be monitored through quarterly data and reconciliation internal audits.		Ongoing	

NHH meter reading application			
Non-compliance	Description		
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 12-Dec-20 To: 04-Aug-21	For six CS files issued by Flick, the switch event readings did not reflect the actual reading or estimated reading on the event date. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are moderate, all the incorrect readings were in manually created CS files and most CS files are generated automatically by the provisioning system. The audit risk rating is low, based on the kWh difference and that the largest difference was resolved through the RR process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Retraining has been provided to the switch team on the submission of read through the CS file		18/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The submission of read through the CS file will be monitored through the monthly compliance reporting and quarterly switch internal audits.		18/11/2021	

NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 8(1) and (2) of Schedule 15.2 From: 01-Dec-20 To: 31-Jul-21	Meter reading frequency reports have not been provided to the market administrator for NHH ICPs continuously supplied for four months or more. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls were weak because no reports have been provided, but have been improved during the audit. The impact is low.		

Actions taken to resolve the issue	Completion date	Remedial action status
Meter reading reports will be provided to the market administrator for the two NHH ICPs listed above.	31/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The NHH profile will be monitored through the monthly compliance reports and quarterly field internal audits. Meter reading frequency reports will be provided for NHH meters for four months or more.	ongoing	

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3)</p> <p>Schedule 15.2</p> <p>From: 05-Feb-21</p> <p>To: 10-Aug-21</p>	<p>Seven CS files had an incorrect read type.</p> <p>The incorrect read types were recorded in Telemetry for two ICPs which had RRs.</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 overall.</p> <ul style="list-style-type: none"> At least 75% of switches are created automatically by the provisioning system. Where files were manually created there were some errors in read types. Rejected RRs are processed manually in Telemetry and two read type errors were detected. <p>The audit risk rating is low overall. All switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The incorrect read types for the two ICPs mentioned above has been corrected in Telemetry.	18/11/2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Retraining has been provided to the switch team on the submission of read through the CS file and updating telemetry with the CS accepted read where applicable. The submission of read through the CS file and telemetry updates will be monitored through the monthly compliance reporting and quarterly switch internal audits.	18/11/2021	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15</p> <p>Schedule 15.2</p> <p>From: 01-Nov-20</p> <p>To: 30-Jun-21</p>	<p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate.</p> <p>Flick did not provide their best estimate for at least eight ICPs which did not have estimates generated because there was insufficient history for Telemetry to create an estimate, and three ICPs where trading period consumption was estimated using a flat profile.</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	The controls are moderate, estimates are created except where there is insufficient history for Telemetry to produce estimates. The impact is assessed to be low, as updated data will be provided through the revision process.	
Actions taken to resolve the issue		Remedial action status
We intend to develop a process to create HHR estimates where there is insufficient history for Telemetry to generate estimates. This project has now been approved for development and has been scoped, and the Tech Team are currently planning and will then develop a solution. A project completion date will be confirmed once planning is complete.		Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
A process change has been implemented where data will be estimated using a non-flat profile (fluctuating half hour data) for all ICP's requiring manual data estimation. The manual estimation process will be monitored through the quarterly data and reconciliation internal audits.	18/11/2021	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Dec-18 To: 02-Nov-21	ICP days are not provided for trading periods which do not have estimated or actual data. 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 rated as strong as they are sufficient to ensure that most data is correctly reported unless actual or estimated data is unavailable. Estimates are created except where there is insufficient history for Telemetry to produce estimates. The impact is assessed to be low, as updated data will be provided through the revision process.	
Actions taken to resolve the issue		Completion date
We intend to develop a process to create HHR estimates where there is insufficient history for Telemetry to generate estimates. This will enable the ICP days to be included in the submission files.		To be confirmed
Preventative actions taken to ensure no further issues will occur		Completion date
Once the above process is implemented the issue of ICPs not being included in the submission due to no read history will be resolved.		Ongoing

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Nov-19</p> <p>To: 02-Nov-21</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate. At least eight ICPs did not have estimates generated because there was insufficient history for Telemetry to create an estimate.</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 moderate, estimates are created except where there is insufficient history for Telemetry to produce estimates. The impact is assessed to be low, as updated data will be provided through the revision process.</p> <p>The issue relating to content of the aggregates file is an error in the code, Flick is providing submission information as expected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We intend to develop a process to create HHR estimates where there is insufficient history for Telemetry to generate estimates. This project has now been approved for development and has been scoped, and the Tech Team are currently planning and will then develop a solution. A project completion date will be confirmed once planning is complete.		To be confirmed	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Once the above process is implemented the issue of ICPs not being included in the submission due to no read history will be resolved		To be confirmed	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 16-Nov-20</p> <p>To: 02-Nov-21</p>	<p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate. At least eight ICPs did not have estimates generated because there was insufficient history for Telemetry to create an estimate.</p> <p>Seven ICPs had consumption recorded on a date with inactive status.</p> <p>Potential impact: Low</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	Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly. The impact is assessed to be low, as updated data will be provided through the revision process.	
Actions taken to resolve the issue		Completion date
We intend to develop a process to create HHR estimates where there is insufficient history for Telemetry to generate estimates. This project has now been approved for development and has been scoped, and the Tech Team are currently planning and will then develop a solution. A project completion date will be confirmed once planning is complete. 25.007 units of inactive consumption has now been added to our system to be reconciled to the market through revision submission		To be confirmed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Our internal process has been changed to reflect inactive status in registry 1 day after the date of disconnection/decommission so that the inactive consumption is captured.</p> <p>This process will be monitored through the monthly compliance reporting and quarterly Field internal audit.</p>		ongoing
		Investigating

Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 16-Nov-20 To: 02-Nov-21</p>	<p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate. At least eight ICPs did not have estimates generated because there was insufficient history for Telemetry to create an estimate.</p> <p>Flick did not provide their best estimate for three ICPs where trading period consumption was estimated using a flat profile.</p> <p>Seven ICPs had consumption recorded on a date with inactive status. Two ICPs had HHY profile applied for longer than the maximum period allowed under the approved profile application. IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date. Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly. The impact is assessed to be low, as updated data will be provided through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We intend to develop a process to create HHR estimates where there is insufficient history for Telemetry to generate estimates. This project has now been approved for development and has been scoped, and the Tech Team are currently planning and will then develop a solution. A project completion date will be confirmed once planning is complete. A process change has been implemented where data will be estimated using a non-flat profile (fluctuating half hour data) for all ICP's requiring manual data estimation. 25.007 units of inactive consumption has now been added to our system to be reconciled to the market through revision submission.</p> <p>The smart meter program has been discontinued which would now eliminate the issue of HHY profile being used longer than the maximum period. If this program is reinstated then we would ensure that the HHY profiles are only used for the allowed maximum period of 16 weeks</p>		Ongoing	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>ARC meters are currently in the process of being displaced so the issue of interval data being received to one decimal place will ultimately be eliminated. In the meantime, we will engage with AMS and explore any temporary solution to this. We will also engage with ARCs to find a resolution for replacement data to be provided for event dates which pass the 15 day mark.</p> <p>Our internal process has been changed to reflect inactive status in registry 1 day after the date of disconnection/decommission to enable the inactive consumption to be captured.</p>	Ongoing	