

Compliance plan for Contact Energy Certified Reconciliation Participant – November 2021

Relevant information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Mar-21</p> <p>To: 30-Sep-21</p>	<p>CTCT, CTCS and CTCX</p> <p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate. Controls are moderate for the CTCT operation. CTCS and CTCX have made improvements and their controls are now rated as moderate. Areas of improvement have been identified in the report.</p> <p>The impact is high based on the volume differences identified, and that corrected data has not yet been prepared in some instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Active ICPs with ANZSIC “T994”:</p> <p>ANZSIC code has been corrected for the period between 16/12/2020 and 27/08/2021 for ICP 0001831350TGAF6.</p> <p>Contact has strong reporting in place to identify any ICPs with a “T9” series ANZSIC code applied in the registry. Corrections are made via a manual process on a regular basis. We continue to work with our staff to ensure the customers end use is validated on signup, and the appropriate ANZSIC code is populated from the contract start date.</p> <p>We will also be looking further into additional system changes that could be implemented to remove the capability for selecting a ‘T9’ series ANZSIC code on customer sign-up.</p> <p>UNM Non-compliances:</p> <p>Contact has made steady improvements with monitoring UNM data since our last audit. We continue to actively work with our</p>		<p><u>CTCT</u></p> <p>Ongoing</p>	Identified

customers and distributors to determine current UNM load details to resolve these non-compliances.

Contact is reviewing the current reporting to identify where any improvement can be made to increase accuracy and ensure correction are made as soon as practicable.

Submission against the RPS profile where the registry has a controlled profile:

We continue our efforts to work with the MEPs as the cost to traders, such as Contact, of having to submit controlled load as RPS is significant and we believe also can distort the accurate application of UFE to all traders. Our focus is now moving to expired certified ICPs now that the population of the 'controlled device certified' flag on the registry is largely accurate.

Incorrect generation profiles recorded on the Registry:

Contact has strong reporting in place to seize any discrepancies. We are actively working with customers, distributors, and MEPs, to ensure the ICPs identified via our Monthly reporting as having incorrect generation related data applied within SAP or the Registry is being investigated/corrected.

Incorrect Status data:

Contact is actively working through all status discrepancies identified via the last RP Audit to ensure the required corrections have been made. Our teams will also be completing a review to identify where the data was inaccurate, and that the identified ICPs were picked up in our monthly reporting. Where the scenarios were not picked up, we will identify the reasons why an make the necessary fixes to our monthly mismatch reporting to include these moving forward.

We will continue to provide refresher training courses to internal staff to assist with further decreasing the opportunity of incorrect status data being applied in the Registry due to a human error. We will continue to work collaboratively with our field service providers to ensure the information returned to Contact Energy from the field are returned with accurate information and in a timely manner.

New Connection Non-compliances:

Contact is working through the exceptions identified during this audit.

New connections are monitored on daily basis through existing reporting, and we are in process of allocating more resources to AC020Trader21 report to further improve the compliance.

<p>Contact continues to work with field contractors and MEPs to address the late paperwork and accuracy issues. Further training has been provided to the operators to ensure MEP nomination rejections are processed accurately in a timely manner.</p> <p>MEP Nominations:</p> <p>ICP 0000165066CK5F0 – Issued has been resolved. Contact is reviewing the MEP nomination rejection process within our SAP system. We are actively working with field contractors to ensure correct MEP is recoded on the field paperwork. We are in process of providing further training to users to ensure exceptions are handled efficiently and in timely manner.</p> <p><u>CTCS/CTCX</u></p> <p>A full review of all switch read changes not updated will be conducted and completed by 30 November 2021.</p>	<p><u>CTCS/CTCX</u></p> <p>30/11/2021</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Please refer to the Actions taken to resolved, which also apply as the preventative actions taken to ensure no further issues will occur.</p> <p><u>CTCS/CTCX</u></p> <p>Automation of the Switch Read change process is due for development in 2022 and will go through the material change audit process.</p> <p>In the meantime, the operations team have been fully trained of the correct process to update these into all systems, and the Compliance team will spot check RR's each month to ensure new reads are reflected in all systems.</p>	<p><u>CTCT</u></p> <p><u>CTCS/CTCX</u></p> <p>30/06/2022</p>	

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 26-May-20</p> <p>To: 17-Aug-21</p>	<p>CTCT</p> <p>61 new metered ICPs had certification details recorded more than five business days after connection.</p> <p>131 ICPs reconnected without having metering certified within 5 business days.</p> <p>CTCS</p> <p>ICP 1002112011LCCEA was not certified within five business days of connection.</p> <p>ICP 0000005966CPA23 was not recertified within five days of reconnection.</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>The controls are rated as strong. Uncertified meters are now identified and notified to MEPs.</p> <p>The audit risk rating is low as a small proportion of ICPs were affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact actively collaborates with field service providers to determine the best way to minimize metering being left un-certified or certified after 5 business days.</p> <p>Where metering cannot be un-bridged and recertified due to no access issues, we have asked the MEP to notify as soon as practicable so we can continue discussions with our customers to organize access.</p> <p><u>CTCS</u></p> <p>This TOU meter install was organised directly by the customer with the MEP, therefore did not go through our standard process which would ensure a contractor takes a test block to certify the meter at the installation. For the Reconnection, the field of Meter Certification was incorrectly updated to N/A, this process has since been reviewed to ensure no repeat of this issue.</p>		<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/10/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCT</u></p> <p>Contact actively collaborates with field service providers to determine the best way to minimize metering being left un-certified or certified after 5 business days.</p> <p>Where metering cannot be un-bridged and recertified due to no access issues, we have asked the MEP to notify as soon as practicable so we can continue discussions with our customers to organize access.</p> <p><u>CTCS</u></p> <p>Our reconnection process has been reviewed and Operations staff re-trained on this process.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>30/09/2021</p>	
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Provision of information on dispute resolution scheme			
Non-compliance		Description	
Audit Ref: 2.19 With: Clause 11.30A From: 01-Apr-21 To: 17-Aug-21		CTCS and CTCX Not in place for inbound phone calls. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as weak as this is not in place for inbound phone calls. The audit risk rating is low, because Utilities Disputes information is provided on the websites and invoices, and in the terms and conditions.	
Actions taken to resolve the issue		Completion date	Remedial action status
CTCS/CTCX Added to IVR for both Simply Energy and Plains Power.		CTCS/CTCX 8/11/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
CTCS/CTCX Added to IVR for both Simply Energy and Plains Power.		CTCS/CTCX 8/11/2021	

<p><u>CTCT</u></p> <p>Contact continues to investigate delays and errors in relation to paperwork from the field. We continue to utilise the contractor performance provisions within the respective agreements to address late or incorrect data being returned on paperwork from the field.</p> <p>We continue to provide on going training to our employees as needed.</p> <p><u>CTCS/CTCX</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates for New Connections and MEP Nominations between April and August. Data quality during this period was significantly low however since an increase in staffing from mid-August, this has reduced the number of late updates now occurring. The Operations Team Lead is now completing quality control to ensure we continue to improve in this space.</p> <p>The Late trader updates are influenced by AMI providers updating the AMI flag to N on HHR reconciled ICPs when no read is received, this is normally +10 Business Days after the last read. We felt that unless data is updated by MEP's in a timelier manner, or the code is changed to align the Traders compliance timelines with the MEPs, then this will continue to be a noncompliance for Simply Energy. NB: any ICPs changing from NHH to HHR reconciliation are done with in Compliance timing.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>31/10/2021</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p><u>CTCT</u></p> <p>Contact acknowledges the non-compliances identified and the underlying factors that lead to incorrect or late notifications in the Registry.</p> <p>Where necessary, continuous training is being provided to employees to assist in minimising the opportunity for late or incorrect notifications being sent to the Registry.</p> <p>We continue to utilise the contractor performance provisions within the respective agreements to address late or incorrect data being returned on paperwork from the field.</p>	<p><u>CTCT</u></p> <p>Onoing</p>	
<p><u>CTCS/CTCX</u></p> <p>A Salesforce view has been created for the Operations Team Lead to monitor all field services jobs. We also import the EDA file regularly so we have visibility over the late registry updates so ongoing coaching to Operations team members can be completed and so we can refine our processes further.</p>	<p><u>CTCS/CTCX</u></p> <p>Ongoing</p>	

Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 15-Mar-21</p> <p>To: 13-Aug-21</p>	<p>CTCT</p> <p>Notification was not provided to the MEP prior to decommissioning for four ICPs from a sample of ten.</p> <p>An incorrect MEP nomination for 0000165066CK5F0 has been rejected and needs to be reissued to the correct MEP (LMGL).</p> <p>The audit compliance report found 11 ICPs where the MEP had been nominated but no response had been received within 14 days of the nomination.</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 overall, because:</p> <ul style="list-style-type: none"> in most cases the MEP is advised prior to decommissioning but where the field services job is raised for Delta and the update to “inactive - ready for decommissioning” status is made after the event date the MEP notification is likely to be late. in almost all cases the correct MEP was nominated. <p>The impact is low because the status updates occurred within four business days of the event date, so the MEP advice was within one week of decommissioning.</p>	
Actions taken to resolve the issue		Completion date
<p>CTCT</p> <p>0000165066CK5F0 – issues resolved.</p> <p>Add comment on MEP acceptance.</p> <p>We are actively working with field contractors to ensure correct MEP is recorded on the field paperwork.</p> <p>We do provide training to new users to ensure exceptions and BPEMs are handled efficiently and in timely manner.</p>		<p>CTCT</p> <p>Ongoing</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>CTCT</p> <p>Further user training will be provided as required.</p>		<p>CTCT</p> <p>Ongoing</p>

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: 19-Sep-19</p> <p>To: 17-Aug-21</p>	<p>CTCT</p> <p>195 late updates to active status and MEP nominations for new connections.</p> <p>Seven new ICPs have incorrect active dates recorded.</p> <p>108 late ANZSIC code updates.</p> <p>CTCS</p> <p>27 late updates to active status for new connections.</p> <p>One late MEP nomination for new connections.</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. Compliance has improved since the previous audit.</p> <p>The audit risk rating is low because the number of ICPs affected overall is small. Late changes to active can result in delays in providing submission information and billing the customer.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>New Connections:</p> <p>Contact is working through correcting the data inaccuracies identified during the audit.</p> <p>We currently have robust daily reporting in place to monitor new connections and the accompanying compliance obligations we have. We acknowledge there is still some improvements required in this space, so we have committed to allocating further resources to our new connection reporting to further assist with reducing the non-compliances from arising and the time taken to resolve any non-compliances identified.</p> <p>As the cause of delayed or inaccurate data becomes apparent or frequent, these instances will continue to be addressed via the contractor performance provisions within the respective agreements.</p> <p>ANZSIC Codes:</p> <p>Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise.</p> <p>The late updates identified by the Auditors were a result of correcting data inaccuracies identified via the above-mentioned reporting.</p> <p>As the root cause of the data inaccuracies are identified, we actively work to implement further training and or process changes for our front office teams to assist in further decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	<p>Identified</p>
<p><u>CTCS</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates for New Connections and MEP Nominations between April and August. Data quality during this period was significantly low, however since an increase in staffing from mid-August, this has reduced the number of late updates occurring. The Operations Team Lead is now completing quality control to ensure the timeliness of events continues to trend in the right direction..</p>	<p><u>CTCS</u></p> <p>31/10/2021</p>	

Preventative actions taken to ensure no further issues will occur	Completion date
<p><u>CTCT</u></p> <p>New Connections:</p> <p>Contact will be committing further resources to the current new connection reporting which is in place.</p> <p>We will continue to utilise the contractor performance provisions within the respective agreements to address late or incorrect data being returned on paperwork from the field.</p> <p>ANZSIC Codes:</p> <p>As the root cause of the data inaccuracies are identified, we will continue to actively work to implement further training and or process changes for our front office teams to assist in further decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p> <p><u>CTCS</u></p> <p>A Salesforce view has been created for the Operations Team Lead to monitor all field services jobs. We also import the EDA file regularly so we have visibility over the late registry updates so ongoing coaching to Operations team members can be completed and so we can refine our processes further.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>Ongoing</p>

ANZSIC codes			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 16-Dec-20</p> <p>To: 14-Oct-21</p>	<p>CTCT</p> <p>18 (18%) of the 100 ICPs sampled were confirmed to have the incorrect ANZSIC codes applied. These were corrected during the audit period.</p> <p>A further two ICPs were confirmed to have incorrect ANZSIC codes while examining late updates to registry.</p> <p>0001831350TGAF6 was updated to ANZSIC code A011 in error effective from 16/12/20 and corrected back to D281100 effective from 27/08/21. The incorrect ANZSIC code is applied from 16/12/20 to 26/08/21.</p> <p>CTCX</p> <p>One of the 20 ICPs sampled had an incorrect ANZSIC code applied. This was corrected during the audit.</p> <p>CTCS</p> <p>Three Category 2 and above metered ICPs with an incorrect residential ANZSIC code applied.</p> <p>Seven (23%) of the 30 ICPs sampled had an incorrect ANZSIC code applied. These were corrected during the audit.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak, based on the proportion of incorrect ANZSIC codes identified.</p> <p>The audit risk rating is low because there is no impact on settlement outcomes and a low impact on the Electricity Authority's reporting accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>The ANZSIC code inaccuracies identified by the auditors were corrected during the audit or have since been corrected.</p> <p>CTCT has steadily been reducing its ANZSIC code mismatches through a variety of clean-up projects as we refine our onboarding process to reduce the likelihood of future errors occurring.</p> <p>Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise.</p> <p>As the root cause of the data inaccuracies are identified, we will continue to actively work to implement further training and or process changes for our front office teams to assist in further decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p> <p><u>CTCS/CTCX</u></p> <p>As we find and are made aware of incorrect ANZSIC codes we make changes to the registry record.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>Ongoing</p>	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>As the root cause of the data inaccuracies are identified via our monthly reporting or clean-up projects, we will continue to actively work to implement further training and or refine processes for our front office teams to assist in further decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p> <p><u>CTCS/CTCX</u></p> <p>We are integrating ANZSIC code analysis and review into our sales and onboarding processes, as well as adding functionality into our systems which will allow us to accurately identify incorrect ANZSIC codes when switching in new ICPs.</p> <p>Additionally, we will start completing a 4 monthly review of all ICPs and their ANZSIC codes to identify and resolve errors.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>31/03/2022</p>	

Changes to unmetered load			
Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 24-Aug-21</p> <p>To: 14-Oct-21</p>	<p>CTCT</p> <p>Some incorrect unmetered load information was identified:</p> <ul style="list-style-type: none"> ICP 0000552757HB3CE has a 125 W MV lamp which is expected to have standard ballast wattage of 11 W, giving a total wattage of 136 W. The 1.656 kWh daily average has been calculated based on 138 W but should have been 1.632 kWh based on 136 W. 0005301922TU192 should be updated to 1.45 kWh and 252;11.9;2x UVL on the registry. 0000553257NR3D0 should be updated to 20;24;security gate on the registry. 0015822016EL2B1 should be updated to 3.45 kWh on the registry. 0005000186HBD7A had its unmetered load details corrected from 28/09/21 but should be corrected from the switch in date 14/04/21. ICPs 0006797822RN416, 0000026060WE15A, 0013531104EL2A7 and 0000024991EA327 do not have unmetered load installed but have unmetered load details recorded on the registry. ICP 0015780248EL8F7 has missing unmetered load details on the registry from 12/03/19 until 23/09/21. SAP is correct so there is no impact on submission. ICP 0000020052CPB35 has missing unmetered load details on the registry from 18/05/21 until 15/09/21. There is also a gap in SAP's unmetered load between the previous customer moving out on 01/06/21 and new customer moving in on 05/06/21. ICP 0016096677ELF31 requires its trader unmetered load details to be corrected to 200;11.5, 2x100W UVL. <p>A further ten ICPs had incorrect unmetered load details corrected during the audit.</p> <p>CTCS</p> <p>Three ICPs with the incorrect unmetered load recorded. This will be resulting in a very minor amount of under submission.</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 currently rated as moderate. During the audit period unmetered load details and failed trader updates were not consistently monitored due to workloads and changes to staff responsibilities. Monitoring is now consistently occurring but there are still some discrepancies which were not resolved prior to the audit.</p> <p>The audit risk rating is low because the impact on settlement is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>Contact is working through the exceptions identified during the audit.</p> <p>In some instances, change or corrections made within Contacts systems has not transferred through to registry due to user errors. We are reviewing the processes in place to eliminate the gaps and upskilling for users will be provided as required.</p> <p>0016096677ELF31 – corrected to 200w 0015780248EL8F7 – updated to reflect network restarted 22.06.2021 - current 0000020052CPB35 date & load corrected gap removed 21.05.2021 - 16.09.2021 0000024991EA327, 0006797822RN416, 0000026060WE15A, 0013531104EL2A7 – load removed from registry 0005000186HBD7A – data fixed 0000553257NR3D0 – gate data fixed 0005301922TU192 – is twin fluoro x2 uvl total 252w kwh values is correct 0000552757HB3CE – kwh fixed</p> <p><u>CTCS</u></p> <p>A review of unmetered load inherited to the CTCS code is underway. Where discrepancies are found, discussions will be held with the client and Distributor to determine a source of the truth so we can reflect the correct information in the Registry; back dated to the 14 month revision if required.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/01/2022</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>CTCT</p> <p>Contact is reviewing its processes along with providing further training to users.</p> <p>Contact will be putting a priority (more resources) towards resolving UNM mismatches identified to ensure these are corrected in a timely manner and will be increasing the frequency of our UNM mismatch reporting being run to ensure UNM mismatches are identified earlier on in the process.</p> <p><u>CTCS</u></p> <p>When new Unmetered sites switch to Simply Energy (all codes) a case is created for operations to manually review/confirm the unmetered load details are accurate.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/10/2021</p>	

Management of “active” status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 21-Jul-20</p> <p>To: 22-Jul-21</p>	<p>CTCT</p> <p>Seven new ICPs have incorrect active status dates recorded.</p> <p>CTCS</p> <p>Four new connections with the incorrect active date recorded.</p> <p>One (5%) of the 18 reconnected ICPs sampled updated to inactive for the incorrect date.</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 as controls will mitigate risk to an acceptable level for all codes but there is room for improvement with accuracy for CTCS/CTCX.</p> <p>The audit risk rating is low, as the number of ICPs affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>Contact is working through correcting the data inaccuracies identified during the audit.</p> <p>We currently have robust daily reporting in place to monitor new connections and the accompanying compliance obligations we have. We acknowledge there is still some improvements required in this space, so we have committed to allocating further resources to our new connection reporting to further assist with reducing the non-compliances from arising and the time taken to resolve any non-compliances identified.</p> <p>As the cause of delayed or inaccurate data becomes apparent or frequent, these instances will continue to be addressed via the contractor performance provisions within the respective agreements.</p> <p><u>CTCS</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates for New Connections and MEP Nominations between April and August. Data quality during this period was significantly low however since an increase in staffing from mid-August, this has reduced the number of late updates. The Operations Team Lead is also now completing quality control over Registry updates to ensure the accuracy and timeliness of events being sent to the Registry continue to trend in the correct direction.</p>		<p><u>CTCT</u></p> <p>Ongoing</p>	Identified
		<p><u>CTCS</u></p> <p>31/10/2021</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>Contact will be committing further resources to the current new connection reporting which is in place.</p> <p>We will continue to utilise the contractor performance provisions within the respective agreements to address late or incorrect data being returned on paperwork from the field.</p> <p><u>CTCS</u></p> <p>Salesforce view created for the Operations Team Lead to monitor all field services jobs. We also import the EDA file so we have visibility with late registry updates - this is used to provide ongoing coaching to Operations team members and refine processes.</p>		<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>Ongoing</p>	
Management of "inactive" status			
Non-compliance	Description		

<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 05-Mar-21</p> <p>To: 03-Aug-21</p>	<p>CTCT</p> <p>Ohoka Downs DUMML ICP 0000366150MP46C is to be decommissioned as the connected lights are metered. The ICP became inactive on 04/06/21, but the registry has recorded inactive status from 07/10/20.</p> <p>Four updates to inactive status were incorrect and were corrected during the audit.</p> <p>CTCS</p> <p>Eight (3+ 2+3) (20%) of the 40 (12+18+10) ICPs sampled updated to inactive for the incorrect dates.</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		
Low	<p>Controls are rated as moderate overall but there is room for improvement in the accuracy of inactive updates for CTCS/CTCX and I have made recommendations above to address this.</p> <p>The number of ICPs affected is small, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>ICP 0000366150MP46C – this issue has now been resolved and correct volumes will be submitted via standard wash up cycles.</p> <p><u>CTCS</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates for New Connections and MEP Nominations between April and August. Data quality during this period was significantly low however since an increase in staffing from mid-August, this has reduced the frequency of late updates occurring. The Operations Team Lead is also acting as quality control to ensure the quality and timeliness data being loaded in the Registry continues to trend in the right direction.</p>		<p><u>CTCT</u></p> <p>Resolved</p> <p><u>CTCS</u></p> <p>31/10/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCT</u></p> <p>Further training on our disconnection/reconnection service orders and work items has been provided to employees to minimise the opportunity for manual data inaccuracies from arising.</p> <p><u>CTCS</u></p> <p>A salesforce view has been created for the Operations Team Lead to assist with monitoring all field services jobs. We also import the EDA file so we have visibility over late registry updates. This file is used to provide ongoing coaching to Operations team members and to assist with further refining our processes.</p>	<p><u>CTCT</u></p> <p>Resolved</p> <p><u>CTCS</u></p> <p>Ongoing</p>	
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Inform registry of switch request for ICPs - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 2 of Schedule 11.3</p> <p>From: 14-May-21</p> <p>To: 07-Jul-21</p>	<p>CTCT</p> <p>One NT file was issued as a transfer switch but should have been a switch move.</p> <p>CTCS</p> <p>Three of the sample of five NT files checked were issued more than two business days after pre-conditions were cleared.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 rated as strong as there is sufficient trained resource in both operations to ensure that NTs are sent to the registry for both CTCT and CTCS/CTCX.</p> <p>The impact is assessed to be low as the number of late NTs overall is assessed to be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>Contact has strong controls in place to minimise the opportunity for incorrect switch types being used.</p> <p>Robust reporting is also in place to help identify when these occurrences arise, so further training can be provided to staff to further assist in stopping the re-occurrence of this non-compliance in future.</p> <p><u>CTCS</u></p> <p>These ICPs had withdrawals due to wrong switch types being used, but due to many ICPs switching and a lack of trained resource in the Operations team at the time, these ICPs were not re-requested as soon as the withdrawals were acknowledged. The addition of more knowledgeable people to the team has added additional value in this area.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/08/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Ongoing coaching for the operators will be completed on a regular basis.</p> <p><u>CTCS</u></p> <p>We now have several knowledgeable people across the switching area, as well as having check-ins and monitoring of Registry breach reports to assist with improving compliance in this area.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>Ongoing</p>	

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>From: 05-Mar-21</p> <p>To: 17-Aug-21</p>		<p>CTCT</p> <p>Eight CS breaches.</p> <p>Two E2 breaches.</p> <p>Three CS files had had an incorrect daily average kWh recorded.</p> <p>17 transfer switches had an estimated read type recorded but should have had actual.</p> <p>One transfer switch had an incorrect last actual read date and was later withdrawn.</p> <p>CTCS</p> <p>All five ICPs sampled of a possible 11 ICPs where the last actual read date is for a date before the switch event date were sent with the incorrect read type of "E" due to human error.</p> <p>Two of the five ICPs sampled of a possible 11 ICPs where the last actual read date is more than one day before the switch event date were sent with the incorrect read type of "A" due to human error.</p> <p>18 (5+5+ 5+3) (87%) of the 20 ICPs (5+5+5+5) sampled had the incorrect average daily consumption recorded.</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 recorded as moderate overall, and Simply Energy has put a work around process in place, so the average daily consumption figure is expected to be calculated correctly going forward but there is room for improvement with the accuracy of last read types being entered.</p> <p>The audit risk rating is low because impact on settlement and participants is minor.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>Eight CS breaches and two E2 breaches:</p> <p>Contact ICT team is investigating the issue and working on the possible solution however a manual process has been implemented to prevent the reoccurrence.</p> <p>Three CS files had had an incorrect daily average kWh recorded:</p> <p>Contact Implemented a logic change in April 2021 to comply with EA requirements for average daily consumption however we have one pending issue which our ICT team is working on.</p> <p>17 transfer switches had an estimated read type recorded but should have had actual:</p> <p>Contact ICT team is investigating the issue and it has been escalated to find the solution. We anticipate this to be resolved by June 2022.</p> <p><u>CTCS</u></p> <p>These issues cannot be "resolved" now as the sites have switched.</p> <p>Overview: A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team, resulting in some errors being made during this time.</p>	<p><u>CTCT</u></p> <p>30/06/2022</p> <p><u>CTCS</u></p> <p>Not applicable</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p><u>CTCT</u></p> <p>Contact ICT team is investigating the issue and working on the possible solutions.</p>	<p><u>CTCT</u></p> <p>30/06/2022</p>	
<p><u>CTCS</u></p> <p>Automation of the CS file generation process is due for development in 2022 and will go through the material change audit process.</p> <p>In the meantime, additional resource was added to the operational team between June 2021 - October 2021. The team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.</p>	<p><u>CTCS</u></p> <p>30/06/2022</p>	

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: 01-Mar-21</p> <p>To: 30-Sep-21</p>	<p>CTCS</p> <p>One late AC file.</p> <p>Approximately 650 of both transfer and switch move ICPs with readings were not reflective of the readings agreed through the RR process resulting in some significant incorrect volumes being reconciled.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate overall as CTCT's controls are strong, but CTCS controls were weak but have been improved to moderate as the backlog of unprocessed read changes is being worked through and going forward these are being actioned as part of BAU from 01/10/21.</p> <p>The impact assessed to be medium due to large number of ICPs affected and the indicative impact on submission with one ICP having 30,819 kWh of under submission from the 17 ICPs sampled.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<u>CTCS</u> A full review of all switch read changes which were not updated is being conducted. All scenarios identified will be resolved.	<u>CTCS</u> 30/11/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCS</u> Automation of the Switch Read change process is due for development in 2022 and will go through the material change audit process. In the meantime, the operations team have been fully trained on the correct process to update these into all systems, and the Compliance team will spot check RR's each month to ensure new reads are reflected in all systems.	<u>CTCS</u> 30/06/2022	

Gaining trader informs registry of switch request - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.7</p> <p>With: Clause 9 of Schedule 11.3</p> <p>From: 10-May-21</p> <p>To: 12-Aug-21</p>	<p>CTCT</p> <p>Seven switch move NT files were issued more than two business days after pre-conditions were cleared. The NTs were initially issued on time for the wrong address and were reissued to the correct address once the error was found.</p> <p>CTCS</p> <p>Two of the sample of five NT files checked were issued more than two business days after pre-conditions were cleared.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>The controls are rated as strong as there is sufficient trained resource in both operations to ensure that NTs are sent to the registry for both CTCT and CTCS/CTCX.</p> <p>The impact is assessed to be low as the number of late NTs overall is assessed to be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>Contact has got strong controls and robust measures in place for this process. Original NTs were issued within the required timeframes however they were found to be for incorrect addresses. New NTs were issued for correct addresses to ensure accuracy and correct outcome for the customers, therefore some of these scenarios are unavoidable.</p> <p><u>CTCS</u></p> <p>These ICPs had withdrawals due to wrong switch type but due to a large number of ICPs switching and a lack of trained resource in the Operations team at the time, these ICPs were not re-requested as soon as the withdrawals were acknowledged. Additional knowledgeable people have been added to the team to further add value in this area.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/08/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>As above.</p> <p><u>CTCS</u></p> <p>We now have several people across the switching area as well as daily check-ins and monitoring of Registry breach reports to minimise the opportunity for con-compliance to arise in this area.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>30/06/2022</p>	

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 10-May-21</p> <p>To: 27-Jul-21</p>	<p>CTCT</p> <p>Two E2 breaches.</p> <p>Two T2 breaches.</p> <p>Two ET breaches affecting one ICP.</p> <p>One WR breach.</p> <p>CTCS</p> <p>Eight AN files sent with AA when MU would have been more accurate.</p> <p>One E2 breach.</p> <p>34 T2 breaches.</p> <p>One WR breach.</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>The controls are recorded as moderate overall for because the breaches for late files all occurred during a period with resourcing issues and have not occurred since resourcing was addressed and training of new staff was complete. The ET breaches affected one ICP and are being investigated by the ICT team.</p> <p>The audit risk rating is low because impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has addressed the resourcing issue and provided further training to the users to prevent reoccurrence of these breaches.</p> <p><u>CTCS</u></p> <p>An update to the business process for sending AN files was made since the last audit however a change of CRM system unexpectedly removed this code. The removed Code was reinstated in July 2021.</p>		<p><u>CTCT</u></p> <p>Completed</p> <p><u>CTCS</u></p> <p>31/07/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<u>CTCT</u> Further training has been provided to the users.	<u>CTCT</u> Completed	
<u>CTCS</u> Code to ensure correct assignment of response codes re-instated in July 2021; and automation of the AN file generation process is due for development in 2022 and will go through the material change audit process.	<u>CTCS</u> 30/06/2022	

Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 08-Mar-21</p> <p>To: 31-Jul-21</p>	<p>CTCT</p> <p>One CS file had an incorrect average daily kWh.</p> <p>Ten transfer switches had an estimated read type recorded but should have had actual.</p> <p>CTCX</p> <p>Incorrect average daily consumption sent for both CS files sent.</p> <p>CTCS</p> <p>All five ICPs sampled of a possible 147 ICPs where the last actual read date is for a date before the switch event date were sent with the incorrect read type of "E" due to human error.</p> <p>All five ICPs sampled of a possible nine ICPs where the last actual read date is more than one day before the switch event date were sent with the incorrect read type of "A" due to human error.</p> <p>18 (5+4+4+4+1) (87%) of the 21 ICPs (5+5+5+5+1) sampled had the incorrect average daily consumption recorded.</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 recorded as moderate overall, as most CS content was accurate and on time, but the calculation of the average daily consumption is a manual process for Simply Energy.</p> <p>The audit risk rating is low because impact on settlement and participants is minor.</p>	
Actions taken to resolve the issue		Completion date
		Remedial action status

<p><u>CTCT</u></p> <p>One CS file had an incorrect average daily kWh:</p> <p>Contact Implemented a logic change in April 2021 to comply with EA requirements for average daily consumption however we have one pending issue which our ICT team is working on.</p> <p>Ten transfer switches had an estimated read type recorded but should have had actual:</p> <p>Contact ICT team is investigating the issue and it has been escalated to find the solution. We anticipate this to be resolved by June 2022.</p> <p><u>CTCS/CTCX</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of resources within the Operations Team. Some errors were made during this time. This has now been resolved through increasing the resources and adding additional quality checks to the process.</p>	<p><u>CTCT</u></p> <p>30/06/2022</p> <p><u>CTCS/CTCX</u></p> <p>31/08/2021</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>Contact ICT team is investigating the issue and working on the possible solutions.</p> <p><u>CTCS/CTCX</u></p> <p>Automation of the CS file generation process is due for development in 2022 and will go through the material change audit process.</p> <p>In the meantime, additional resource was added to the operational team between June 2021 - October 2021. Tthe team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.</p>	<p><u>CTCT</u></p> <p>30/06/2022</p> <p><u>CTCS/CTCX</u></p> <p>30/06/2022</p>	

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: 01-Mar-21</p> <p>To: 30-Sep-21</p>	<p>CTCT</p> <p>Five late RR files for switch moves.</p> <p>The reading in SAP for one ICP did not reflect the outcome of the RR process and was corrected during the audit.</p> <p>CTCS</p> <p>Approximately 650 of both transfer and switch move ICPs had readings not reflective of the readings agreed through the RR process resulting in some significant incorrect volumes being reconciled.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate overall as CTCT's controls are strong, but CTCS controls were weak but have been improved to moderate as the backlog of unprocessed read changes is being worked through and going forward these are being actioned as part of BAU from 01/10/21.</p> <p>The impact assessed to be medium due to large number of ICPs affected and the indicative impact on submission with one ICP having 30,819 kWh of under submission from the 17 ICPs sampled.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Late RRs were required to ensure accuracy and correct billing for the customers. Some of these delays are unavoidable due to meter access issues. Further training has been provided to the user to ensure read accuracy.</p>		<p><u>CTCT</u></p> <p>Ongoing</p>	Identified
<p><u>CTCS</u></p> <p>A full review of all switch read changes that have been not updated is being conducted. Once identified the respective resolution patch will be taken to ensure the data inaccuracies are corrected.</p>		<p><u>CTCS</u></p> <p>30/11/2021</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCT</u></p> <p>Further training has been provided to the users.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	
<p><u>CTCS</u></p> <p>Automation of the Switch Read change process is due for development in 2022 and will go through the material change audit process.</p> <p>In the meantime, the operations team have been fully trained on the correct process to update these into all systems, and the Compliance team will spot check RR's each monthly to ensure new reads are reflected in all systems.</p>	<p><u>CTCS</u></p> <p>30/06/2022</p>	

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: 11-Mar-21 To: 20-Aug-21</p>	<p>CTCT</p> <p>Five NWs did not have the code with the best fit applied.</p> <p>17 SR breaches.</p> <p>78 NA breaches.</p> <p>CTCX</p> <p>One NW did not have the code with the best fit applied.</p> <p>CTCS</p> <p>Six NWs did not have the code with the best fit applied.</p> <p>Two NWs issued in error.</p> <p>Five SR breaches.</p> <p>Two NA breaches.</p> <p>Five AW breaches.</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 overall, a small number of NW files did not have the NW code with the best fit applied and a small number of files were late. The number of late files decreased later in the audit period.</p> <p>The audit risk rating is low because impact on settlement and participants is minor. Revised reconciliation data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has provided further training to the users to prevent these breaches.</p> <p>All late NWs were sent for valid reasons. These often involve complex and lengthy investigations hence some of these delays are inevitable.</p> <p><u>CTCS/CTCX</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of resources within the Operations Team. Data quality during this period was negatively impacted, however since an increase in knowledgeable staff from Mid-August, we now have a dedicated staff member working on this process with the Operations Team Lead as back up and quality control.</p>		<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>30/11/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>Contact has provided additional training to the users and will continue to look for further improvements in this process.</p> <p><u>CTCS/CTCX</u></p> <p>The Operations Team have been updated around the different codes and when they should be applied following the recent audit. This is including what we have learnt recently that NWDF must only be used for future date NT's - NWCE to be used instead. All teams are now across the different NW codes and when they must be applied.</p>		<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>30/11/2021</p>	

Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 01-Mar-21 To: 30-Sep-21</p>	<p>CTCS</p> <p>All five ICPs sampled of a possible 11 transferred ICPs and all five switch move ICPs sampled of a possible 147 where the last actual read date is for a date before the switch event date were sent with the incorrect read type of "E" due to human error.</p> <p>Two of the five ICPs sampled of a possible 11 transferred ICPs and all five ICPs sampled of a possible nine switch moves where the last actual read date is more than one day before the switch event date were sent with the incorrect read type of "A" due to human error.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are rated as moderate overall as CTCT's controls are strong, but CTCS controls were weak but have been improved to moderate but there is room for improvement.</p> <p>The impact assessed to be low due to the number of ICPs affected as percentage of the total number of switches completed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCS</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low, however since an increase in resources from mid-August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control to assist with minimising the opportunity for non-compliance to arise.</p>		<p><u>CTCS</u></p> <p>30/09/2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCS</u></p> <p>Automation of the CS file generation process is due for development in 2022 and will go through the material change audit process.</p> <p>In the meantime, additional resource was added to the operational team between June 2021 - October 2021. The team have also developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.</p>	<p><u>CTCS</u></p> <p>30/06/2022</p>	
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Distributed unmetered load			
Non-compliance	Description		
<p>Audit Ref: 5.4</p> <p>With: Clause 11 of schedule 15.3</p> <p>From: 01-May-21</p> <p>To: 06-Nov-21</p>	<p>CTCT and CTCS</p> <p>The monthly database extracts used to derive submission from are provided as a snapshot and do not track changes at a daily basis as required by the code.</p> <p>Inaccurate submission information for several databases.</p> <p>Some streetlight audits not submitted by the due date.</p> <p>No streetlight audit undertaken for Waka Kotahi ICPs 0016099060EL730 and 0110004920EL4F1</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls in place mitigate risk most of the time, therefore the control rating is moderate.</p> <p>There is a major impact on settlement outcomes because there are examples of over submission and under submission; therefore, the audit risk rating is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We are in the process of investigating why some streetlight audits were not submitted by the due date. We are also working with clients to either meter or measure via an alternative method, such as a council RAMM data base. We hope to have these resolve middle of 2022.</p>		<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/12/2021</p>	Identified

<p><u>CTCS</u></p> <p>Overdue Audits will be submitted prior to Christmas 2021; New audits are prioritised to ensure ongoing issues are minimised.</p> <p>The two Waka Kotahi ICPs are listed in the registry as standard Unmetered and is how they were tendered initially. The recent audit completed by Veritek identified these two as DUML and negotiations underway with the client to ensure that these ICPs will either be switched to their incumbent supplier of DUML ICPs (and integrated into that audit schedule) or a new Audit will be completed.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>[Participant comment]</p> <p><u>CTCT</u></p> <p>Please refer to Actions taken to resolve.</p> <p><u>CTCS</u></p> <p>Discussions have been had with all DUML clients about submitting daily information for reconciliation. Uptake has been slow and whilst we work with them towards a more detailed monthly submission, we use the best information available.</p>	<p><u>CTCT</u></p> <p><u>CTCS</u></p> <p>Ongoing</p>	

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 24-Aug-21</p> <p>To: 14-Oct-21</p>	<p>CTCT</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 24 ICPs.</p> <p>ICPs 0000932060TE629, 0418695067LC047, and 0419151060LCCOF are believed to be generating but do not have I flow metering installed and electricity is not quantified according to the code.</p> <p>CTCX</p> <p>NHH ICP 0000012442EA341 has RPS profile and does not have generation metering installed. Solar generation was installed on 04/06/21 but import/export metering was only installed on 17/09/21, therefore quantification was not occurring.</p> <p>CTCS</p> <p>ICP 0000589585UNDB0 is believed to be grid connected generation but the I flow is not settled.</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 rated as moderate as they are sufficient to reduce the risk most of the time.</p> <p>The audit risk rating is low. 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 as discussed in section 8.1.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>Bridged meters – our ability to resolve these meter bridging scenarios has been restricted due to the Auckland / upper North Island Covid lockdowns – we will attempt to resolve these once the alert levels enable contractors to enter customers premises.</p> <p>Contact has made steady improvements to distributed generation exceptions since the last audit. We are actively working with our customers and distributors to determine distributed generation details to resolve these non-compliances. Contact will ensure any future non-compliances will be actioned as part of our monthly reconciliation process.</p> <p>For ICPs 0418695067LC047 and 0419151060LCC0F, the issues are now resolved and generation metering with I flow direction has been installed</p> <p><u>CTCX/CTCS</u></p> <p>0000012442EA341 - Request to organise metering was received 4/08/2021 and metering was organised ASAP upon receipt.</p> <p>0000589585UNDB0 - Generation on site has been designed to never export, however is theoretically possible, so the I flow has been changed to be a settlement register</p>	<p><u>CTCT</u></p> <p><u>CTCX/CTCS</u></p> <p>Complete</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>Contact has made steady improvements to distributed generation exceptions since the last audit. We are actively working with our customers and distributors to determine distributed generation details to resolve these non-compliances. Contact will ensure any future non-compliances will be actioned as part of our monthly reconciliation process.</p> <p><u>CTCX/CTCS</u></p> <p>A new query will be built to identify ICPs that have values populated in "DIST - Generation Capacity" field but no corresponding I flow settlement register.</p>	<p><u>CTCT</u></p> <p><u>CTCX/CTCS</u></p> <p>28/02/2022</p>	

Derivation of meter readings			
Non-compliance		Description	
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>		<p>CTCT</p> <p>IHUB estimates labelled as actuals.</p> <p>CTCS</p> <p>Meter condition information is not routinely reviewed to identify issues with seals, tampering, phase failure or safety.</p> <p>IHUB estimates labelled as actuals.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating		Rationale for audit risk rating	
Low		<p>The controls are recorded as weak because they are unlikely to mitigate risk most of the time.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>IHUB estimates labelled as actuals was recently identified and we are now working with the MEP to resolve.</p> <p><u>CTCS</u></p> <p>Please refer to preventative actions.</p>		<p><u>CTCT</u></p> <p><u>CTCS</u></p> <p>30/09/2022</p>	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>		<p>Completion date</p>	

<p><u>CTCT</u></p> <p>We have been informed by HUB that their AMI platform upgrade is to be carried out during February 2022. This will then enable the filtering out of estimate reads in the files sent to Contact.</p> <p><u>CTCS</u></p> <p>Simply Energy is working to implement a data warehouse solution which will automatically pull and store AMI event logs in tandem with Half Hour Volumes from our data management system to flag events which require investigation.</p> <p>We are working with our billing system provider to remediate the issue related to IHUB estimates being labelled as Actuals and will discuss how to remedy historic read imports as part of job SDH-698.</p>	<p><u>CTCT</u></p> <p><u>CTCS</u></p> <p>30/09/2022</p> <p>31/03/2022</p>	
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NHH meter reading application			
Non-compliance	Description		
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 30-Sep-21</p>	<p>CTCS</p> <p>All five transferred ICPs sampled of a possible 11 transferred ICPs and all five switch move ICPs sampled of a possible 147 ICPs where the last actual read date is for a date before the switch event date were sent with the incorrect read type of “E” due to human error.</p> <p>Two of the five ICPs sampled of a possible 11 transferred ICPs and all five switch move ICPs sampled of a possible nine ICPs where the last actual read date is more than one day before the switch event date were sent with the incorrect read type of “A” due to human error.</p> <p>Approximately 650 of both transfer and switch move ICPs had readings not reflective of the readings agreed through the RR process resulting in some significant incorrect volumes being reconciled.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate overall as CTCT’s controls are strong, but CTCS controls were weak but have been improved to moderate as the backlog of unprocessed read changes is being worked through and going forward these are being actioned as part of BAU from 01/10/21.</p> <p>The impact assessed to be medium due to large number of ICPs affected and the indicative impact on submission with one ICP having 30,819 kWh of under submission from the 17 ICPs sampled.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCS</u></p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Some errors were made during this time. This has now been resolved through an increase in resources and also by adding additional quality checks to the process.</p> <p>A full review of all switch read changes that have not been updated is being conducted. As inaccuracies are identified the appropriate remedial action will be completed.</p> <p>All submission volume changes that fall within the 14-month washup window will be resolved. Outside of the R14 revision cycle, decisions will be made on a case by case basis.</p>	<p><u>CTCS</u></p> <p>31/08/2021</p> <p>30/11/2021</p> <p>30/11/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCS</u></p> <p>Automation of the CS, RR & AC file generation process is due for development in 2022 and will go through the material change audit process.</p> <p>In the meantime, additional resource was added to the operational team between June 2021 - October 2021. The team have also developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.</p> <p>The operations team have also been fully trained on the correct process to update AC accepted readings into all systems.</p> <p>The Compliance team will spot check RR's monthly to ensure accepted readings are reflected in all systems.</p>	<p><u>CTCS</u></p> <p>30/06/2022</p>	

Interrogate meters once			
Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>	<p>CTCT</p> <p>For at least three ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>CTCS</p> <p>For at least ten ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak as they are not sufficient to ensure the best endeavours requirement is met where the period of supply is less than 130 days.</p> <p>The audit risk rating is low, as most of the ICPs without a read during the period of supply appear to have been supplied for a short period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We recognise that our Metering Compliance Process is very effective with customers that have sequential unread meters for more than 6 months. However, for some customers that switch in on a gain estimate and move to an alt retailer within the first few months of supply are proving hard to control.</p>		<p><u>CTCT</u></p> <p>Ongoing</p>	Identified
<p><u>CTCS</u></p> <p>We are unable to resolve these issues as the ICPs have switched away. If an RR is received within the 14 months revision cycle we will accept.</p>		<p>CTCS</p> <p>Not Applicable</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCT</u></p> <p>We are looking into reviewing estimates on switching files to trigger a conversation with new customers, so that we can resolve access/meter location issues as soon as possible to obtain an actual read.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	
<p><u>CTCS</u></p> <p>We will be completely revamping our no-read events processes moving forward.</p>	<p><u>CTCS</u></p> <p>31/01/2022</p>	

NHH meters interrogated annually			
Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: clause 8(1) and (2) Schedule 15.2.</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>	<p><u>CTCS</u></p> <p>For at least 18 ICPs unread annually, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because CTCT has processes in place to resolve meter reading issues, but CTCS does not currently have resources to manage meter reading attainment.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCS</u></p> <p>We will work with our clients to obtain a read and/or better information which enables our meter readers to access the metering at site.</p>		<p><u>CTCS</u></p> <p>28/02/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCT</u></p> <p>Ongoing Our No Reads Process is being re-designed to ensure this identifies events and investigation/remediation can commence in a timelier manner.</p> <p>Actions to be implemented include importing and reporting on metering events for AMI meters, importing notes from manual readers, implementation of templated customer communication around no access, special read requests etc. This will be managed by a combination of our Operational and customer-facing teams.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p>31/01/2022</p>	
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NHH meters 90% read rate			
Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 01-Jun-21</p> <p>To: 30-Jun-21</p>	<p>CTCT</p> <p>For at least three ICPs unread at 4 months, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>CTCX</p> <p>For one ICP unread at 4 months, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>CTCS</p> <p>For at least seven ICPs unread at 4 months, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because for CTCT they mitigate risk most of the time but there is room for improvement. The no-read process would need to start earlier than 130 days for the controls to be considered strong. For CTCX and CTCS the processes are not currently operating due to resource constraints.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p><u>CTCT</u></p> <p>We recognize that our Metering Compliance Process is very effective with customers that have sequential unread meters for more than 6 months. However, for some customers that switch in on a gain estimate and move to an alt retailer within the first few months of supply are proving hard to control.</p> <p><u>CTCS/CTCX</u></p> <p>We will work with our clients to get a read and/or better information to enable our meter readers to access the meter</p>	<p><u>CTCT</u></p> <p><u>CTCS/CTCX</u></p> <p>28/02/2022</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>We are looking into reviewing estimates on switching files to trigger a conversation with new customers, so that we can resolve access/meter location issues as soon as possible to obtain an actual read.</p> <p><u>CTCS/CTCX</u></p> <p>Our No Reads Process is being re-designed to ensure this identifies events and investigation/remediation can commence in a timelier manner.</p> <p>Actions to be implemented include importing and reporting on metering events for AMI meters, importing notes from manual readers, implementation of templated customer communication around no access, special read requests etc. This will be managed by a combination of our Operational and customer-facing teams.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>31/01/2022</p>	

Identification of readings			
Non-compliance	Description		
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3) Schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>	<p>CTCT</p> <p>17 incorrectly labelled switch event meter readings.</p> <p>IHUB estimates labelled as actuals.</p> <p>CTCS</p> <p>Seven of ten ICPs sampled of a possible 22 transferred ICPs, and all ten sampled of a possible 156 had incorrectly labelled switch event meter readings.</p> <p>IHUB estimates labelled as actuals.</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 recorded as moderate overall but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contacts ICT team is investigating the issue and it has been escalated to find the solution. We anticipate this to be resolved by June 2022.</p>		<p><u>CTCT</u></p> <p>30/06/2022</p>	Identified
<p><u>CTCS</u></p> <p>We unfortunately cannot resolve these historic switching issues as they the ICPs have since switched.</p> <p>Regarding IHUB import issue, please see preventative actions.</p>		<p><u>CTCS</u></p> <p>Not Applicable</p> <p>31/03/2022</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCT</u></p> <p>Contact ICT team is investigating the issue and working on the possible solutions.</p> <p><u>CTCS</u></p> <p>We have now implemented a Refreshed Bulk Switch Out process where we can identify during the process of producing the CS, sites where we have had actual reads to determine the correct label to use (A or E). This process is an interim step that is managed by the operations team lead and a member of the team as back up until we can get this process automated in 2022 to remove any manual inputs.</p> <p>We are working with our billing system provider to remediate this issue, we will discuss how to remedy historic read imports as part of job SDH-698.</p>	<p><u>CTCT</u></p> <p>30/06/2022</p> <p><u>CTCS</u></p> <p>30/06/2022</p> <p>31/03/2022</p>	
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Meter data used to derive volume information		
Non-compliance	Description	
<p>Audit Ref: 9.3</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>	<p>CTCS and CTCX</p> <p>AMS and EDM1's EIEP3 file format may round the trading period data to two decimal places if the meter does not have a multiplier and the volume for that hour has a non-zero value in the third decimal place.</p> <p>Any NHH data recorded with decimal places in Datahub is rounded to the nearest whole number when exported to EMS' MADRAS for reconciliation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>For HHR data, the controls are rated as moderate because data includes all decimal places provided for most ICPs. For NHH data the controls are rated as weak because all NHH meter information is rounded before it is entered into MADRAS where reconciliation submissions are calculated. Overall, the controls are recorded as moderate.</p> <p>The impact is assessed to be low for the EIEP3 format, because a small number of ICPs are expected to be affected and the issue only affects the third decimal place under certain circumstances. For NHH data the audit risk rating is low, because only NHH meter readings provided with decimal places are affected.</p>	
Actions taken to resolve the issue		Remedial action status

<p><u>CTCS & CTCX</u></p> <p>EIEP3 rounding: We are awaiting AMS to provide a response; EDM I have already noted this noncompliance.</p> <p>NHH data recorded with decimal places is sent with full decimal places to MADRAS but was being rounded upon import into MADRAS. The provider of the MADRAS system is in the process of fixing this issue.</p>	<p><u>CTCS & CTCX</u></p> <p>31/03/2022</p> <p>31/03/2022</p>	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCS & CTCX</u></p> <p>EIEP3 rounding: EDM I are looking at making changes in early 2022.</p> <p>NHH data recorded with decimal places is sent with full decimal places to MADRAS but was being rounded upon import into MADRAS. The provider of the MADRAS system is in the process of fixing this issue.</p>	<p><u>CTCS & CTCX</u></p> <p>31/03/2022</p> <p>31/03/2022</p>	

Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: Clause 17(4)(f)&(g) of schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>	<p>CTCT</p> <p>Clock synchronisation and event reports not reviewed. Voltage on the load side of a disconnected meter event is not sent by MEPs.</p> <p>CTCS and CTCX</p> <p>AMI event logs are not routinely reviewed.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because event information is only dealt with if the MEP sends additional correspondence.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact is reviewing this process to establish adequate steps/reports to ensure efficiency and compliance in this space.</p> <p>We are expecting to have some reporting in place by June 2022.</p> <p><u>CTCS/CTCX</u></p> <p>Please refer to preventative actions.</p>		<p><u>CTCT</u></p> <p>30/06/2022</p> <p><u>CTCS/CTCX</u></p> <p>30/09/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>Contact is working to establish adequate steps/reports to ensure efficiency and compliance in this space. This is expected to be implemented by June 2022.</p> <p><u>CTCS/CTCX</u></p> <p>Simply Energy is working to implement a data warehouse solution which will automatically pull and store AMI event logs in tandem with Half Hour Volumes from our data management system to flag events which require investigation. A process will be created off the back of the solution for users to investigate and resolve flagged events.</p>		<p><u>CTCT</u></p> <p>30/06/2022</p> <p><u>CTCS/CTCX</u></p> <p>30/09/2022</p>	

Calculation of ICP days			
Non-compliance	Description		
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Mar-21</p> <p>To: 20-Oct-21</p>	<p>CTCT</p> <p>ICP days were not reported correctly where settlement unit information was incorrect in SAP, or a system defect resulted in an incorrect submission type being applied. Contact has been working to resolve these issues before revision 14, and the ICP days differences are generally small.</p> <p>CTCS</p> <p>Over submission of 31 NHH ICP days for one ICP not closed out in MADRAS</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 overall. For CTCT workarounds are in place to identify and correct ICPs with missing or incorrect settlement units and submission types. For CTCS, only one minor issue was identified.</p> <p>The impact is assessed to be low because corrected data will be washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT</p> <p>CTCT is continuing to clean up ICP days errors and we have now cleaned up exceptions older than 3 months. We are also resolving system issues that cause these errors to reduce future errors occurring</p> <p>CTCS</p> <p>This will be resolved in R7 washup.</p>		<p>CTCT</p> <p>Ongoing</p> <p>CTCS</p> <p>31/01/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>CTCT</p> <p>CTCT has implemented additional reporting to identify potential HHR ICP days mismatches to enable more timely corrections.</p> <p>CTCS</p> <p>All ICP Days corrections are now reviewed as part of every revision cycle.</p>		<p>CTCT</p> <p>Ongoing</p> <p>CTCS</p> <p>Ongoing</p>	

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-May-21</p> <p>To: 30-Sep-21</p>	<p>CTCT</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>CTCX</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>CTCS</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>Potential impact: Medium</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>The controls are recorded as strong because the Authority has responsibility to resolve this matter.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We believe that due to conflicts between the Code and the RM functional specification we are not able to comply with both sets of requirements.</p> <p><u>CTCS/CTCX</u></p> <p>We believe that due to conflicts between the Code and the RM functional specification we are not able to comply with both sets of requirements.</p> <p>We believe that the code is written in such a way that it is not possible to be compliant.</p> <p>This has been noted previously and if we change our processes to comply with this clause, that will result in non-compliances in other areas of the Code.</p>		<p><u>CTCT</u></p> <p>N/A</p> <p><u>CTCS/CTCX</u></p> <p>Not Applicable</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<u>CTCS/CTCX</u> Please refer to comments in Actions taken to resolve.	<u>CTCS/CTCX</u> Not Applicable	
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<p><u>CTCT</u></p> <p>1001157629CK617 – SAP has been corrected to enable submissions to occur.</p> <p>ICP 0000366150MP46C – this issue has now been resolved and correct volumes will be submitted via standard wash up cycles</p> <p>Contact is working through the exceptions identified during this audit for incorrect active status dates.</p> <p>We are in process of allocating more resources to AC020Trader21 report to improve the compliance and to pick up the exceptions in more timely manner.</p> <p>Contact continues to work with field contractors and MEPs to address the accuracy issues on returned paperwork.</p> <p>0000020052CPB35 – ICP has been corrected to ensure correct UML details are loaded.</p> <p><u>CTCS/CTCX</u></p> <p>0000012442EA341 -We reconciled generation as soon as we were able to. First we were aware of the generation install was 4/8/21. Once we were made aware metering to measure, I Flow was organised ASAP. It would appear as though the Network approved livening of the Distributed Generation before metering was installed to measure I flow; Metering with an I flow was certified 17/9/2021. This is being reconciled from that date.</p> <p>1/9/2020 submission will be resolved in R14.</p> <p>0000572490WT5C1 has been made active retrospectively, volumes will be submitted via usual revision process (consumption period 30/11/2020 onwards)</p>	<p><u>CTCT</u></p> <p><u>CTCS/CTCX</u></p> <p>Not Applicable</p> <p>30/11/2021</p> <p>31/8/2022 (before all revisions are successfully submitted)</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p><u>CTCT</u></p> <p>More resource allocation to AC020Trader21 report along with ongoing training for the operators.</p> <p>Continuous discussion with MEPs and field contractors to improve the quality of the paperwork.</p> <p>0000020052CPB35 – SAP and registry has been corrected to ensure correct UML details are loaded.</p> <p><u>CTCS/CTCX</u></p> <p>CTCS 202009 - The audit identified an unknown issue with the logic in our software that identifies gaps in our analysis of completeness, which has already been rectified.</p> <p>Management of inactive ICPs is now a monthly check/process.</p>	<p><u>CTCT</u></p> <p><u>CTCS/CTCX</u></p> <p>30/11/2021</p>	
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Allocation of submission information			
Non-compliance	Description		
Audit Ref: 12.3 With: Clause 15.5 From: 01-Mar-21 To: 20-Oct-21	CTCT NSP manual corrections are not always applied if changes occur to an NSP then back again within the same balancing area and the same month. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> We are currently working with ICT to implement some system changes which will allow NSP corrections via a bulk update. The specifications our ICT team are working towards is specifically designed to target the scenario noted by the auditors.		<u>CTCT:</u> Mid 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> Please refer to the Action taken to resolve.			

Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 07-Oct-20</p> <p>To: 14-Oct-21</p>	<p>CTCT, CTCX and CTCS</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The CTCT controls are strong, but the CTCS controls still require strengthening in some areas. The overall control rating is recorded as moderate.</p> <p>The impact is high based on the volume differences identified, and that corrected data has not yet been prepared in some instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>1001157629CK617 – SAP has been corrected to enable submissions to occur.</p> <p>ICP 0000366150MP46C – this issue has now been resolved and correct volumes will be submitted via standard wash up cycles</p> <p>ICP days:</p> <p>CTCT is continuing to clean up ICP days errors and we have now cleaned up exceptions older than 3 months. We are also resolving system issues that cause these errors to reduce future errors occurring</p> <p><u>CTCS/CTCX</u></p> <p>Due to the large number of discrepancies following the large switching of ICPs from CTCT to CTCS, the corrections were not done in a timely manner. Since then, additional resource was added to the operational team between June 2021 - October 2021 and additional quality checks have also been added to the switching processes since the period in question.</p>		<p><u>CTCT</u></p> <p><u>CTCS/CTCX</u></p> <p>30/09/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<u>CTCS/CTCX</u> All discrepancies are identified at each revision cycle, and all are worked on for resolution within that revision cycle.	<u>CTCS/CTCX</u> 30/09/2021	
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Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Mar-21 To: 20-Oct-21	CTCT, CTCS and CTCX Some estimates were not replaced by revision 14. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, because there are processes in place to attain readings by revision 14 and enter permanent estimate readings. There are sound estimation processes, therefore I have recorded the audit risk rating as low.	
Actions taken to resolve the issue		Completion date
<u>CTCT</u> Contact continues to focus on long term no access properties process in order to improve our submission completeness.		<u>CTCT</u> Ongoing
<u>CTCS/CTCX</u> We are unable to resolve the noncompliance to having an estimate beyond 14 months.		<u>CTCS/CTCX</u> Not Applicable
Preventative actions taken to ensure no further issues will occur		Completion date

<p><u>CTCT</u></p> <p>Contact continues to focus on long term no access properties process in order to improve our submission completeness.</p> <p><u>CTCS/CTCX</u></p> <p>Our No Reads Process is being re-designed to ensure this identifies events and investigation/remediation can commence in a timelier manner.</p> <p>Actions to be implemented include importing and reporting on metering events for AMI meters, importing notes from manual readers, implementation of templated customer communication around no access, special read requests, etc. This will be managed by a combination of our operational and customer-facing teams.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>31/01/2022</p>	
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Reconciliation participants to prepare information			
Non-compliance		Description	
Audit Ref: 12.9 With: Clause 2(1)(c) of schedule 12.3 From: 01-Mar-21 To: 20-Oct-21		CTCT Unmetered submission not occurring for ICP 0000366150MP46C. HHR submission not occurring for ICP 1001157629CK617. Potential impact: High Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> 0000366150MP46C – Registry now corrected to enable submissions to occur up to the decommission date. 1001157629CK617 – SAP now corrected to enable submission			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> 0000366150MP46C – this ICP has now been decommissioned. 1001157629CK617 – we are in the process of decommissioning this ICP.			

Historical estimates and forward estimates			
Non-compliance	Description		
<p>Audit Ref: 12.10</p> <p>With: Clause 3 Schedule 15.3</p> <p>From: 01-May-20</p> <p>To: 28-Oct-21</p>	<p>CTCS and CTCX</p> <p>Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 recorded as moderate because historic and forward estimate is correctly identified most of the time.</p> <p>There is no impact on settlement because the calculation is correct; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCS/CTCX</u></p> <p>There were two issues underlying this problem: first: SASV files published by the RM were being uploaded into our systems, and the second is that we do not receive SASV files for UML or PV1 profiles, therefore some usage on these profiles was being incorrectly marked as FE where they were meant to be 100% HE.</p> <p>To remedy the first issue, we have incorporated a checklist step into our monthly process to ensure all files are uploaded each month before BD13 submissions are generated. This will mean that volumes will be correctly labelled as HE where appropriate as we progress through the wash up revision cycles.</p> <p>To remedy the second issue, we are in the process of testing a new process where a dummy SASV file is created for PV1 and UML based on the RPS file, and uploaded to our systems each month before BD13 submissions.</p>		<p><u>CTCS/CTCX</u></p> <p>30/11/2021</p>	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>		<p>Completion date</p>	

<u>CTCS/CTCX</u> We will use the profile shapes provided by the RM Portal for RPS - for UML, PV1 so that we have a complete set.	<u>CTCS/CTCX</u> Ongoing through the washup cycle	
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Forward estimate process			
Non-compliance	Description		
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Mar-21 To: 20-Oct-21	<p>CTCT</p> <p>Inaccurate FE caused the thresholds not to be met in some instances.</p> <p>CTCS</p> <p>Thresholds were not met for some revisions due to unmetered load estimates being based on 55 kWh per day. There was one meter reading error.</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 recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is low because Initial data is replaced with revised data and washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>The April 2020 FE inaccuracy was due to the first Covid lockdown where our estimation algorithm could not cope this with scenario. The other consumption periods were due to either corrupt estimations (Influx meters) or NSPs where there is a prevalence of irrigation load. We are actively working with our AMI MEPs to increase the number of irrigation ICPs with AMI metering to improve the read performance therefore reducing the risk of inaccurate estimations.</p> <p><u>CTCS</u></p> <p>The material change audit approved (August 2021) has corrected the 55 kWh per day on UML sites.</p>		<p><u>CTCT</u></p> <p>CTCS</p> <p>31/08/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<u>CTCS</u> Where thresholds are not met, they are reviewed as part of our reconciliation revision analysis to understand issue, however as the issue is primarily caused by having and submitting more accurate data (in place of estimate data), this will not stop the non-compliance but does provide rigour and regular feedback to our data management processes and reconciliation.	<u>CTCS</u> Ongoing	
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Historical estimate reporting to RM			
Non-compliance	Description		
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: 01-Mar-20 To: 31-Mar-21	CTCT Historic estimate thresholds were not met for some revisions. CTCS Historic estimate thresholds were not met for some revisions. CTCX Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as strong for CTCT because in most cases the thresholds were met. The controls for CTCS are weak leading to a large proportion of the submission quantities being estimated. Overall, the controls are recorded as moderate. The audit risk rating is medium, because the lack of actual data for CTCS leads to inaccurate submissions, as recorded in section 12.7.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> We continue to work with our non-AMI meter reading provider to improve read attainment and to also target the long term no access properties <u>CTCS/CTCX</u> We are unable to resolve the noncompliance on historic estimate thresholds.		<u>CTCT</u> <u>CTCS/CTCX</u> Not Applicable	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCS/CTCX</u></p> <p>Our No Reads Process is being re-designed to ensure this identifies events and investigation/remediation can commence in a timelier manner.</p> <p>Actions to be implemented include importing and reporting on metering events for AMI meters, importing notes from manual readers, implementation of templated customer communication around no access, special read requests, etc. This will be managed by a combination of our Operational and customer-facing teams.</p>	<p><u>CTCS/CTCX</u></p> <p>31/01/2022</p>	