

Compliance plan for Contact Energy Reconciliation Participant – May 2021

Participants to give access		
Non-compliance	Description	
<p>Audit Ref: 1.11</p> <p>With: Clause 16A.4</p> <p>From: 29-Jan-21</p> <p>To: 13-Apr-21</p>	<p>CTCS and CTCX</p> <p>Information not provided within 15 business days of the request.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as most information was generally provided as requested but it there is a resource constraint at Simply hence overall control rating.</p> <p>The audit risk rating is low as the information was eventually provided but this impacted analysis time.</p>	
Actions taken to resolve the issue		Completion date
<p><u>CTCS & CTCX</u></p> <p>Simply Energy is appointing additional staff to their Operations Team which will allow sufficient resources to be available to support the audit process, including the provisions of information.</p>		<p>Proposed or actual date:</p> <p>06/08/2021</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p><u>CTCS & CTCX</u></p> <p>In the next audit Simply Energy will have additional dedicated staff members (Operations Team Leader and Specialist) who will be responsible for covering the Registry and Switching audit requests.</p>		<p>Proposed or actual date:</p> <p>14/05/2021</p>
		Identified

Material Change Audits			
Non-compliance	Description		
Audit Ref: 1.12 With: Clause 16A.11 From: 01-Oct-20 To: 30-Apr-21	Material change audit not conducted for the management of unmetered load by Simply Energy. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are recorded as weak because it was not identified that this change was a risk and that an audit was required. The impact on settlement is major with inaccurate submissions of over 1 GWh; therefore the audit risk rating is high.		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy will submit a material change process to Veritek in relation to their management of unmetered load within the current NHH submission process.		Proposed or actual date: <u>CTCS</u> 30/06/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As part of our post project Lessons Learned review we have identified a number of areas where we can improve our approach to large scale migrations and in the future Contact Energy will ensure the appropriate change audit is completed where required in future.		Proposed or actual date: N/A	

Relevant information	
Non-compliance	Description
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 01-Jul-20 To: 30-Apr-21	CTCT, CTCS and CTCX Some inaccurate data is recorded and was not updated as soon as practicable. Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9

Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as weak. Controls are moderate for the CTCT operation. Validation processes are in place for CTCS and CTCX, but their manual nature and increased workloads resulted in some errors not being detected and resolved as soon as practicable.</p> <p>The audit risk rating is high, because of the major impact on submission accuracy, mainly due to the CTCS unmetered load errors.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Active date variance with Initial Electrical Connection Date:</p> <p>Contact has made further reporting changes that include implementing the AC020Trader21 report alongside existing internal weekly reports that monitor the date variances between the Status event date, IED, and certification dates, to assist with pick up the variances much earlier in the process.</p> <p>We continuously work with Distributors, MEPs, and our field service providers to resolve date variances between status event dates, IED, and certification date.</p> <p>Active ICPs with a “T9” series ANZSIC code:</p> <p>Contact has robust reporting in place to identify any ICPs with a “T9” series ANZSIC code applied in the registry and corrections are made via a manual process on a regular basis.</p> <p>We will be actively working with our front-line staff to ensure the customers end use is validated on signup, and the appropriate ANZSIC code is applied.</p> <p>We will also be looking into what system fixes can 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 the last audit. We continue to actively work with our customers and distributors to determine current UNM load details to resolve these non-compliances.</p> <p>A review of the current reporting will be completed to identify where improvements can be made to the existing UNM reporting to increase accuracy and ensure updates/corrections are made as soon as practicable.</p> <p>Submission against the RPS profile where the registry has a controlled profile:</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS & CTCX</u></p> <p>06/08/2021</p>	<p>Identified</p>

<p>We will continue 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 has the ability to distort the accurate application of UFE to all traders.</p> <p>Incorrect generation profiles recorded on the Registry:</p> <p>Contact has robust reporting in place to pickup any discrepancies. We are actively working with customers, distributors, and MEPs, to ensure the ICPs identified via the 2021 RP Audit and via our Monthly reporting as having incorrect generation related data applied within SAP or the Registry is being investigated/corrected.</p> <p>Incorrect Status data:</p> <p>Contact is actively working through all status discrepancies identified via the 2021 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, that the effected 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.</p> <p>We will continue to provide refresher training courses to internal staff members to decrease the opportunity of incorrect status data being applied in the Registry due to a human error and will continue to work collaboratively with our field service providers to ensure the information returned to Contact Energy via service order are returned with accurate information and on a timely manner.</p> <p><u>CTCS & CTCX</u></p> <p>Simply Energy have hired two additional staff with previous electricity industry knowledge to add urgent focus to the Operations key processes.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact acknowledges the non-compliances identified by the auditors, and the underlying factors causing the late or incorrect notifications to the Registry. We are reviewing our existing registry reconciliation processes and reporting to extend the capabilities to assist in minimising non-compliances arising, and ensuring updates and corrections to data are being completed within the required timeframes.</p> <p><u>CTCS & CTCX</u></p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing.</p> <p><u>CTCS & CTCX</u></p> <p>31/08/2021</p>	

Along with Simply Energy hiring additional industry experienced personnel, a project focussed on the Operations team which will include a refresher and regular training has been created to assist in improving the overall compliance.		
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Electrical Connection of Point of Connection		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 06-May-20</p> <p>To: 18-Jan-21</p>	<p>CTCT</p> <p>34 new ICPs had no certification details recorded, and 44 new ICPs had certification details recorded more than five business days after connection.</p> <p>181 ICPs reconnected without having metering certified within 5 business days.</p> <p>11 ICPs' meters were not recertified on unbridging.</p> <p>CTCS</p> <p>ICP 0000163173CKED6 was not certified within five business days of connection.</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>The controls are rated as moderate. Uncertified meters are now identified but there is room for improvement to complete these in a timely manner.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We acknowledge that reconnections and connecting of ICPs have occurred without the certifying or recertifying of metering, or the certification has occurred after the required timeframes, particularly with legacy metering assets not owned by CTCT.</p> <p>A report is being run weekly to try identify these occurrences before they become non-compliant and to ensure that any parties involved have enough time to recertify the installation. We are reviewing internally and with our field service providers the run frequency of this reporting to identify if increasing the frequency of the report being run (to twice a week or daily) would be beneficial or assist in minimising the possibility for this non-compliance to arise.</p> <p><u>CTCS</u></p>	<p>Date:</p> <p><u>CTCS</u></p> <p>13/05/2021</p>	Investigating

<p>The installation was requested by the Contact Energy Team prior to a migration tranche switch over to CTCS and this work order was overlooked during this process.</p> <p>Full certification is now in place on the non-compliant ICP.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact are collaboratively working with field service providers to identify the best means of minimising the possibility of metering being left un-certified, or certified after 5 business days.</p> <p>Where there is a no access issues to unbridge and recertify meters, we have asked the MEPs to ensure that we are notified as soon as possible of any problems so that we can discuss further with our customer.</p> <p>We have also requested our primary field service Contractor to contact us immediately if they receive an unbridge metering service order that does not have metering details included. Our Field Service team will investigate the problem for actioning a new service order to the correct MEP.</p> <p><u>CTCS</u></p> <p>No changes to Simply Energy's processes have been made. Simply Energy's current processes requires full compliance when installing Meters.</p> <p>The non-compliance of the ICP identified was an unforeseen outcome as a result of a project failure during the switching of sites from CTCT to CTCS.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p>	

Provision of information on dispute resolution scheme	
Non-compliance	Description
<p>Audit Ref: 2.19</p> <p>With: Clause 11.30A</p> <p>From: 01-Apr-21</p> <p>To: 19-May-21</p>	<p>CTCS and CTCX</p> <p>There is not currently a system wide approach to providing information on Utilities Disputes for outbound communications and responses to customer queries. This is intended to be developed by the end of May 2021.</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 rated as weak as there is not a consistent approach.</p> <p>The audit risk rating is low, because Utilities Disputes information is provided on the websites and invoices, and in the terms and conditions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCS & CTCX</u> Please refer to the preventative actions.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCS & CTCX</u> Information regarding Utilities Disputes will be added to all Invoices and the automated signature for any communication sent via Simply Energy's Salesforce system (primary means of communication with all CTCS clients).		Date: <u>CTCS & CTCX</u> 31.05.2021	

Provision of information on electricity plan comparison site			
Non-compliance	Description		
Audit Ref: 2.20 With: Clause 11.30B From: 01-Apr-21 To: 19-May-21	<p>CTCS and CTCX</p> <p>There is not currently a system wide approach to providing information on Powerswitch for outbound communications and responses to customer queries. This is intended to be developed by the end of May 2021.</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 rated as weak as there is not a consistent approach.</p> <p>The audit risk rating is low, because Powerswitch information is provided on the websites and by Plains Power. Most customers with residential ANZSIC codes are supplied by the Plains Power brand.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCS & CTCX</u> Please refer to the preventative actions.			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCS & CTCX</u> Information regarding Powerswitch will be added to all Invoices and the automated signature for any communication sent via Simply Energy's Salesforce system (primary means of communication with all CTCS clients)	Date: 31/05/2021	

Changes to registry information	
Non-compliance	Description
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 01-Jul-20 To: 20-Jan-21	CTCT 928 late updates to active status. 649 late updates to inactive status. 1,912 late trader updates. CTCX One late trader update. CTCS 11 late updates to active status. 29 late trader updates. 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 overall: <ul style="list-style-type: none"> CTCT has an automated process which has improved the timeliness of updates, and the status and trader update process is manual for CTCS and CTCX but only a small number of updates were late. Overall the level of compliance is high with the majority of updates being completed within five business days of the event. The audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact will continue to investigate paperwork-related delays and errors from the field. These instances are regularly addressed via the contractor performance provisions within the respective agreements.</p> <p>Ongoing training will be provided to staff as required.</p> <p><u>CTCS & CTCX</u></p> <p>Simply Energy have hired two additional staff with previous electricity industry knowledge to add urgent focus to the Operations key processes.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS & CTCX</u></p> <p>06/08/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact acknowledges the non-compliances identified and the underlying factors causing the incorrect and late notifications to the registry. Ongoing training will be provided to staff as required. We will continue to investigate paperwork related delays and errors from the field. These instances are regularly addressed via the contractor performance provisions within the respective agreements.</p> <p><u>CTCS & CTCX</u></p> <p>Along with Simply Energy hiring additional industry experienced personnel, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS & CTCX</u></p> <p>31/08/2021</p>	

Trader responsibility for an ICP	
Non-compliance	Description
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 18-Jan-21</p> <p>To: 25-Jan-21</p>	<p>CTCT</p> <p>The audit compliance report found two 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: Strong</p>

	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls over MEP nomination accuracy are strong; the process is automated and mapping ensures that the correct MEP is usually nominated unless a manual error is made.</p> <p>The impact is low because both MEP nominations were accepted by the MEP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> Contact 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 and BPEMs are handled efficiently and in timely manner.		Date: <u>CTCT</u> Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> Further user training will be provided as required.		Date: <u>CTCT</u> Ongoing	

Provision of registry information	
Non-compliance	Description
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 01-Jun-20 To: 26-Jan-21	<p>CTCT</p> <p>306 late updates to active status and MEP nominations for new connections.</p> <p>13 new ICPs had incorrect active dates recorded, and ten of those were corrected during the audit. The following ICPs still have incorrect active dates recorded 1002108203LCA64 (22/11/20 instead of 21/11/20), 0007197288RN34C (8/11/20 instead of 8/9/20), 0007197493RN133 (23/9/20 instead of 22/9/20).</p> <p>112 late ANZSIC code updates.</p> <p>CTCS</p> <p>Five late updates to active status for new connections.</p> <p>Three late MEP nominations 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		
<p>Low</p>	<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>Contact is working through correcting the ICP exceptions identified by the Auditors.</p> <p>We continue to monitor on a daily basis the accuracy and timeliness of status and retailer event data loaded in the Electricity Registry for New Connections through our robust reporting processes. Additional reporting is being implemented (AC020Trader21) and will be run alongside the existing reporting to assist in identifying where there is a non-compliance, as well as assisting in identifying the non-compliance earlier on in the process.</p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> <p><u>CTCS</u></p> <p>Simply Energy have hired two additional staff with previous electricity industry knowledge to add urgent focus to the Operations key processes.</p>		<p>Date:</p> <p><u>CTCS</u></p> <p>06.08.2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>Ongoing reporting and regular discussions with our field service providers are in place to improve the accuracy and timeliness of events being sent from SAP to the Registry. Amendments to the reporting and discussions will occur as the cause for late or inaccurate data becomes clear or frequent.</p> <p><u>CTCS</u></p> <p>Along with Simply Energy hiring additional industry experienced resources, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/08/2021</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: 01-Jul-20</p> <p>To: 13-Apr-21</p>	<p>CTCT</p> <p>52 ICPs which were confirmed to have incorrect ANZSIC codes were corrected during the audit.</p> <p>CTCS</p> <p>Five ICPs which were confirmed to have incorrect ANZSIC codes were corrected during the audit</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, 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 52 ICPs which were identified and confirmed as having an incorrect ANZSIC code applied in the Electricity Registry were corrected during the audit.</p> <p><u>CTCS</u></p> <p>The 7 ICPs which were identified and confirmed as having an incorrect ANZSIC code applied in the Electricity Registry have since been corrected.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>N/A</p> <p><u>CTCS</u></p> <p>05/12/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>We are investigating into the specific occurrences identified to better understand how the incorrect ANZSIC codes were applied during customer sign-up, and whether a more appropriate ANZSIC code could have been identified based on the information provided by the customers.</p> <p>Once the underlying factors causing the non-compliances have been identified we will look to implement process and/or</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>31/01/2022</p>	

<u>CTCT</u> All ICPs identified as having incorrect UNM details in SAP and the Electricity Registry (Trader Event) have been corrected accordingly.	Date: <u>CTCT</u> 24/05/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> 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 (moving from monthly to weekly) to ensure UNM mismatches are identified earlier on in the process.	Date: <u>CTCT</u> Ongoing	

Management of "active" status		
Non-compliance	Description	
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 08-Sep-20 To: 16-Apr-20	<p>CTCT</p> <p>13 new ICPs (of a sample of 63) had incorrect active dates recorded, and ten of those were corrected during the audit. The following ICPs still have incorrect active dates recorded 1002108203LCA64 (22/11/20 instead of 21/11/20), 0007197288RN34C (8/11/20 instead of 8/9/20), and 0007197493RN133 (23/9/20 instead of 22/9/20).</p> <p>CTCS</p> <p>ICP 0000016378HR527 had an incorrect status date, which was corrected during the audit.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as the discrepancy reporting has been reinstated but some errors still occur.</p> <p>The audit risk rating is low, as the number of ICPs affected is small.</p>	
Actions taken to resolve the issue		Remedial action status
<u>CTCT</u>		Date: Identified

<p>Ten of the 13 ICPS identified as having an incorrect status date applied in the Electricity Registry were corrected during the audit.</p> <p>One of the three ICPs identified but not corrected the audit has since been corrected, with the remaining two still being under investigation. We envisage having these two ICPs corrected in the coming weeks.</p> <p><u>CTCS</u></p> <p>The ICP identified as having an incorrect status date applied in the Electricity Registry was corrected during the audit.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	
	<p><u>CTCS</u></p> <p>30/04/2021</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>In addition to completing the already existing New Connection reporting which we work collaboratively with Distributors, MEPS, and Field Service Providers on, Contact will be implementing the AC020Trader21 available in the Electricity Registry.</p> <p>Contact will continue to investigate paperwork-related delays and errors from the field. These instances are regularly addressed via the contractor performance provisions within the respective agreements.</p> <p>We have also recently implemented a system change to how SAP handles ICPs switching-in to Contact with an INACTIVE status applied. Previously a status of ACTIVE would be automatically applied in the Registry, and if this were found to be incorrect a correction would be made. The system change implemented will stop and ACTIVE status from being automatically loaded in the Registry, and instead will identify the correct status to be applied on completion of the switch gain. This fix will result in less ACTIVE status data being loaded in the Registry in error.</p> <p><u>CTCS</u></p> <p>Simply Energy will run through refresher training with staff members to assist in minimising the opportunity for a non-compliance to arise in the future.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>23/05/2021</p> <p><u>CTCS</u></p> <p>31/07/2021</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: 07-Dec-12</p> <p>To: 30-Apr-21</p>	<p>CTCT</p> <p>0009544560CN3E5 was disconnected effective from 25/6/13, but 7/12/12 was applied.</p> <p>0007103286RN193 was disconnected at the pillar but had inactive status reason code 10 (electrically disconnected at meter box fuse) applied.</p> <p>ICP 0000366150MP46C was updated to inactive status in error on 28 August 2019.</p> <p>CTCS</p> <p>0000040548WEC86 was updated to inactive from 26/10/20 but should have been updated from 29/10/20.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are moderate overall because inactive consumption is not specifically monitored or actioned for CTCS or CTCX. The other controls over management of inactive ICPs are stronger, and help to reduce the risk of incorrect statuses or status dates being applied.</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>We are currently working through to resolve the three discrepancies identified during the audit.</p> <p><u>CTCS</u></p> <p>We are unable to resolve this non-compliance retrospectively as we have requested a reversal of decommissioned Status Event from WEL Networks, however WEL Networks declined to reverse their event to allow the correction of our Inactive – Ready for Decommissioning Status event.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>19/05/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p>		<p>Date:</p> <p>Ongoing</p>	

<p>We have recently implemented a system change to how SAP handles ICPs switching-in to Contact with an INACTIVE status applied. Previously a status of ACTIVE would be automatically applied in the Registry, and if this were found to be incorrect a correction would be made. The system change implemented will stop and ACTIVE status from being automatically loaded in the Registry, and instead will identify the correct status to be applied on completion of the switch gain. This fix will result in less late INACTIVE status events being loaded in the Registry.</p> <p>We continue to engage with our field service providers to improve the quality/accuracy of data being returned on completed Service Orders.</p> <p>We will be completing a review of the disconnection codes able to be applied against disconnection service orders to ensure field service providers can only return valid combinations. Where incorrect combinations are identified the relevant service order tables will be updated accordingly.</p> <p><u>CTCS</u></p> <p>Simply Energy will run through refresher training with staff members to assist in minimising the opportunities for the non-compliance to arise in future.</p>	<p><u>CTCS</u></p> <p>31/07/2021</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: 19-Aug-20</p> <p>To: 21-Aug-20</p>	<p>CTCX</p> <p>One NT file was 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: 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 rated as weak, because 29/35 switch move and transfer switch NT files checked were issued more than two business days after pre conditions were cleared. The delays were caused by workloads and validation checks for groups of ICPs switching in.</p> <p>The impact is low because the file was issued one business day late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<u>CTCX</u> We do not believe we can resolve these historic identified non compliances, so will put focus on implementing systems and processes to minimise the opportunity for this non-compliance arising in the future.	Date: 20/5/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCX</u> Automation of the switch request process is to be deployed.	Date: 31/07/2021	

Losing trader must provide final information - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 21-Jul-20</p> <p>To: 02-Dec-20</p>	<p>CTCT</p> <p>One late CS file.</p> <p>One CS file for a HHR AMI ICP contained an incorrect average daily kWh, reading, and read type.</p> <p>Three CS files had had incorrect daily average kWh recorded.</p> <p>CTCS</p> <p>For non-AMI meters average daily kWh is calculated as the daily average between the most recent validated read and the previous validated read, where the previous validated read is at least 21 days before the most recent validated read. Where these reads are not at least 21 days apart, average daily kWh will not be calculated as required by the Registry Functional Specification.</p> <p>Four CS files had incorrect daily average kWh recorded.</p> <p>The CS for 0086146103WRE02 (event date 13/11/20) had an incorrect average daily kWh, and event read type, and the event reading did not reflect the best estimate of consumption on the event date.</p> <p>CTCX</p> <p>For non-AMI meters average daily kWh is calculated as the daily average between the most recent validated read and the previous validated read, where the previous validated read is at least 21 days before the most recent validated read. Where these reads are not at least 21 days apart, average daily kWh will not be calculated as required by the Registry Functional Specification.</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, as most CS content was accurate and on time, but I note that Simply Energy's current average daily consumption calculation will not achieve compliance for all ICPs.</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 late CS file – A process change has already been implemented to minimise the possibility of this non-compliance reoccurring in the future.</p> <p>One CS file for a HHR AMI ICP contained an incorrect average daily kWh, reading, and read type - Contact is undertaking the review of this process and are actively engaging with our ToU MEPs to move the data collection from a ToU platform to an AMI data platform to provide the data in a CS file for HHR AMI ICP's.</p> <p>Three CS files had incorrect daily average kWh recorded. A system fix was deployed in April 2021 to resolve the noted scenarios. No further reoccurrence of these issues has been identified since.</p>		<p>Date:</p> <p>Ongoing</p>	Identified
<p><u>CTCS & CTCX</u></p> <p>Simply Energy do not believe they can resolve these identified non compliances, so a focus has been put on implementing systems to minimise the possibility of the non-compliance reoccurring in the future.</p>		<p>CTCS</p> <p>N/A</p> <p>CTCX</p> <p>N/A</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>We have made process changes and have deployed system fixes to minimise the possibility of the non-compliances occurring in the future. We are reviewing the process for CS contents for HHR ICPs requested as TR or MI switches.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p>	
<p><u>CTCS</u></p> <p>Simply Energy will run through refresher training with staff. Automation of the Switch Loss process will be investigated: We will look to introduce an automated workflow generated off the back of the switch loss record received from Registry. They will use this information to trigger Datahub to generate a final read (estimate or actual, depending on last actual read) which will be</p>		<p><u>CTCS & CTCX</u></p> <p>31/01/2021</p>	

validated and sent back to CRM system. Further automation will be introduced to automatically to generate the correct avg daily kWh based on the last two actual reads in accordance with the code. Simply Energy believes to resolve the inaccuracies we need to completely automate the entire Switch Loss process.		
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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: 15-Jun-20</p> <p>To: 05-Jan-21</p>	<p>CTCT</p> <p>Seven late RR files.</p> <p>One late AC file.</p> <p>CTCS</p> <p>Three late RR files.</p> <p>The RR for 0000800124TP205 (event date 5/6/20) was not supported by at least two validated actual readings.</p> <p>MADRAS did not reflect the outcome of the RR process for 0000800124TP205 (event date 5/6/20).</p> <p>Potential impact: Medium</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:</p> <ul style="list-style-type: none"> CTCT's controls are strong. Additional monitoring controls have been implemented for CTCT; users responsible for RR and AC files use the switch breach report as well as relying in BPEMs. CTCS controls are moderate, as there is room for improvement. <p>The impact is medium because the incorrectly recorded event reading in MADRAS has resulted in over submission of 26,829 kWh. The difference will wash out through the revision process once the error is corrected.</p>	
Actions taken to resolve the issue		Remedial action status
<p><u>CTCT</u></p> <p>Seven late RR files. – Contact is in process of providing further training to the operators to minimise the possibility of late RR files in future.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p>Identified</p>

<p>One late AC file – Contact has further strengthened the controls to minimise the reoccurrence, with no further issue being identified since the change occurred in July 2020.</p> <p><u>CTCS</u></p> <p>0000800124TP205 was effectively an internal transfer between two Contact owned codes; The RR for 0000800124TP205 was requested by CTCT (Email received 12/06/2020) and actioned by CTCS. CTCT switched on an estimate read and subsequently gained an actual that was significantly below the switch read. We felt the volume was accounted for accordingly at both ends, with both ends being under the Contact Energy umbrella, therefore that the risk was low, however going forward we will ensure we meet the code requirements.</p> <p>Confirmed with EMS (screen shot provided separately) that Madras does show the new start read from the RR.</p>	<p><u>CTCS</u></p> <p>18/05/2021</p>	
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 provided. We have further strengthened our controls for late AC file as mentioned by the auditors in the commentary.</p> <p><u>CTCS</u></p> <p>Simply Energy will confirm with EMS that all RR's received show their new reads in Madras.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>28/05/2021</p>	

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>CTCT</p> <p>Switch move was applied for three transfer switches to ensure that they were transferred from the correct date. Two of the ICPs migrated from Club Energy and one ICP switched in from Genesis at the end of its contract term.</p> <p>Switch move was applied for approximately 10,000 ICPs which transferred from Club Energy to CTCT.</p> <p>CTCS</p> <p>Switch move was applied for ICPs which transferred from CTCT to CTCS.</p> <p>Switch move was applied for three ICPs with metering category three or four, which should have been requested as HH switches.</p>

<p>From: 20-Jun-20</p> <p>To: 02-Oct-20</p>	<p>Switch move was incorrectly applied for the sample of 29 switch move NT files checked.</p> <p>28 NT files were issued more than two business days after pre-conditions were cleared.</p> <p>CTCX</p> <p>Four NT files 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: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are rated as weak overall:</p> <ul style="list-style-type: none">a large proportion of ICPs requested as switch moves were for ICPs which were transferring between retailers at the same address, and29/35 switch move and transfer switch NT files checked for CTCX and CTCX were issued more than two business days after pre conditions were cleared; the delays were caused by workloads and validation checks for groups of ICPs switching in. <p>The impact is low:</p> <ul style="list-style-type: none">use of switch move can help to ensure that ICPs are transferred from the correct date, reducing the number of withdrawals and is generally applied with approval from the other trader, andthe late NT files were all sent within five business days of pre-conditions being cleared, so while timing differences could occur for reconciliation, it will wash out through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>As noted by the auditor, a switch move was applied to ensure accuracy of the switch dates. Transfer switch type does not allow to fix a switch date for both gaining and losing retailer. Move Switch was used to give certainty to the consumers, traders, and to ensure contractual obligations were met. This limitation with Transfer switch has been raised with the Electricity Authority through the Switch process review via Switching Technical Group.</p> <p><u>CTCS & CTCX</u></p> <p>These issues are primarily the result of human error.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS & CTCX</u></p> <p>30/06/2021</p>	<p>Investigating</p>

Automation of the switch request process is to be deployed which will minimise these errors for reoccurring in the future.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> This limitation with the Transfer switch has been raised with Electricity Authority through the Switch process review via Switching Technical Group. <u>CTCS & CTCX</u> Automation of the switch request process is to be deployed which will minimise these errors for reoccurring in the future.	Date: <u>CTCT</u> Ongoing <u>CTCS & CTCX</u> 31/07/2021	

Losing trader must provide final information - switch move	
Non-compliance	Description
Audit Ref: 4.10 With: Clause 11 Schedule 11.3	<p>CTCT</p> <p>Seven switch move CS files had an incorrect switch event read type "E" was recorded instead of "A".</p> <p>CS files for four metered ICPs did not contain CSMETERCHANNEL, CSMETERCOMPONENT or CSMETERINSTALL lines. All of the switches were withdrawn.</p> <p>CS files for three ICPs had an incorrect average daily kWh.</p> <p>CTCS</p> <p>For non-AMI meters average daily kWh is calculated as the daily average between the most recent validated read and the previous validated read, where the previous validated read is at least 21 days before the most recent validated read. Where these reads are not at least 21 days apart, average daily kWh will not be calculated as required by the Registry Functional Specification.</p> <p>The CS for ICP 0007106716RNC51 (event date 1/10/20) had an incorrect event read type. The event reading was estimated with a read type of actual because the user had not ticked the estimate box when manually entering the read.</p> <p>The CS files for ICPs 0005960665RND53 (event date 1/1/21) and 0000121314HB04C (event date 3/12/20) had an incorrect average daily kWh because Salesforce was not correctly updated by Datahub.</p> <p>CS files for five ICPs had an incorrect average daily kWh.</p> <p>CTCX</p> <p>For non-AMI meters average daily kWh is calculated as the daily average between the most recent validated read and the previous validated read, where the previous validated read is at least 21 days before the most recent validated read. Where these reads are not at least 21 days apart, average daily kWh will not be calculated as required by the Registry Functional Specification.</p>

From: 13-Jun-20 To: 20-Jan-21	Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
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 I note that Simply Energy’s current average daily consumption calculation will not achieve compliance for all ICPs.</p> <p>The audit risk rating is low because impact on settlement and participants is minor. All CS files with missing rows were withdrawn, and the CS accuracy issues are being investigated by Contact and Simply Energy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Seven switch move CS files had an incorrect switch event read type of “E” recorded instead of “A”. – Contact’s ICT team is investigating the system issue and based on the findings, we anticipate to having a system fix deployed by end of August 2021 to resolve this non-compliance.</p> <p>CS files for four metered ICPs did not contain CSMETERCHANNEL, CSMETERCOMPONENT or CSMETERINSTALL lines. All of the switches were withdrawn. -</p> <p>Contact is undertaking the review of this process and are actively engaging with our ToU MEPs to move the data collection from ToU platform to AMI data platform to provide this data in CS file for HHR AMI ICP’s.</p> <p>CS files for three ICPs had an incorrect average daily kWh. - System fix was deployed in April 2021 to resolve the noted scenarios. No further reoccurrence of these issues have been identified since." Aug-21 ICT team is investigating the system fix and we are reviewing the process for CS contents where meter is category two for HHR AMI meters. Aug-21</p> <p><u>CTCS & CTCX</u></p> <p>Simply Energy do not believe they can resolve these identified non-compliances so will put a focus on implementing systems</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>21.08.2021</p>	Identified

to minimise the possibility of this non-compliance reoccurring in future, as noted in the preventative actions.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Our ICT team is investigating a possible system fix and we are reviewing the process for CS contents where meter is category two for HHR AMI meters.</p> <p><u>CTCS & CTCX</u></p> <p>Simply Energy will run through refresher training with staff.</p> <p>Automation of the Switch Loss process will be investigated: Simply Energy will look to introduce an automated workflow generated off the back of the switch loss record received from Registry. They will use this information to trigger Datahub to generate a final read (estimate or actual, depending on last actual read) which will be validated and sent back to CRM system. Further automation will be to introduced to automatically to generate the correct avg daily kWh based on the last two actual reads in accordance with the code. Simply Energy believes to resolve the inaccuracies we need to completely automate the switching loss process.</p>	<p>Date</p> <p>CTCT: 21.08.2021</p> <p>CTCS& CTCX: 31/01/2022</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: 23-Jun-20</p> <p>To: 18-Jan-21</p>	<p>CTCT</p> <p>28 late RR files.</p> <p>One late AC file.</p> <p>CTCS</p> <p>Two RR files were issued in error.</p> <p>Three RR files were not supported by at least two actual validated readings including the two RR files issued in error.</p> <p>Three ICPs MADRAS and/or Datahub readings did not reflect the outcome of the RR process.</p> <p>One late AC file.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate overall:</p> <ul style="list-style-type: none"> CTCT's controls are strong and additional monitoring controls have been implemented for CTCT; users responsible for RR and AC files use the switch breach report as well as relying in BPEMs, and CTCS controls are moderate, as there is room for improvement. <p>The impact on settlement is minor because the number of ICPs is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>28 late RR files. - Contact is in process of providing further training to the operators to further minimise the possibility for this non-compliance to arise again in future.</p> <p>One late AC file - Contact has further strengthened the controls as noted in the Auditors commentary to avoid the reoccurrence of this non-compliance with no further issues being identified since the change went live in July 2020.</p> <p><u>CTCS</u></p> <p>A review of all RR files will take place to ensure that the correct information is held within both Datahub and Madras.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>28/05/2021</p>	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> Ongoing coaching for the operators will occur. We have also further strengthened the controls for late AC file as noted by the auditor in their commentary.	Date: <u>CTCT</u> Ongoing	
<u>CTCS</u> The RR process is to be fully automated and with NHH DA to be developed in Datahub we will minimise the possibility of these non-compliances from re-occurring in the future.	<u>CTCS</u> Ongoing	

Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.12 With: Clause 14 of Schedule 11.3 From: 25-Nov-20 To: 05-Jan-21	CTCS One late HH NT. Two PT breaches for one HH ICP. Switch move was applied for three ICPs with metering category three or four, which should have been requested as HH switches. Potential impact: None Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, because: <ul style="list-style-type: none"> the NTs checked outside of the Christmas to New Year holiday period were on time, the PT breach occurred because of a change of event date requested by the losing trader, and there is a process to manually select the correct switch type for meter categories three and above, but the manual step was missed for three switches. The audit risk rating is low because the NT file was issued eight business days after pre-conditions were met, and the change of event date was requested by the losing trader. The HH switches were completed.	
Actions taken to resolve the issue		Remedial action status

<u>CTCS</u> Simply Energy do not believe they can resolve these historic identified non-compliances, so a focus has been put on implementing systems to minimise the possibility of this non-compliance from re-occurring in the future. this happening again. Please refer to preventative actions.	Date: <u>CTCS</u> 20/05/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCS</u> Simply Energy will be automating the switch request process.	Date: <u>CTCS</u> 31/07/2021	

Gaining trader to advise the registry manager - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.14 With: Clause 16 Schedule 11.3 From: 04-Jun-20 To: 01-Nov-20	CTCS Three HH CS files contained CSMETERINSTALL, CSMETERCOMP and CSMETERCHANNEL rows as well as a CSPREMISES row. For all three ICPs the daily average kWh and readings for all registers were populated as zeros. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong, because HH CS content was correct, except where the registry meter configuration required the additional information to be provided. Zeros were populated because the required information was not readily available. The impact was low, because the ICPs are HHR settled.	
Actions taken to resolve the issue		Remedial action status
<u>CTCS</u> This identified non-compliance issue cannot be historically resolved. This non-compliance was a result of incorrect metering information supplied to the Electricity Registry by the MEP		Date: <u>CTCS</u> N/A

which left us in a position to either 1) push a non-compliant file through to facilitate the switch; or 2) not facilitate the switch and result in a breach.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCS</u> <p>If this occurs in the future, Simply Energy will propose the MEPs to correct the metering information loaded in the Electricity Registry.</p> <p>They would be open to some guidance or recommendations from the Electricity Authority on what the most appropriate course of action for a trader should be when this occurs during a switch.</p>	<p>Date:</p> <p><u>CTCS</u></p> <p>N/A</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: 01-Jun-20</p> <p>To: 11-Jan-21</p>	<p>CTCT</p> <p>Two NWs did not have the NW code with the best fit applied.</p> <p>16 SR breaches.</p> <p>112 NA breaches.</p> <p>CTCS</p> <p>ICPs 0001952200TGF2E (event date 1/11/2020) and 0004670202AL515 (event date 2/6/2020) had date failure codes applied but were withdrawn because they should not have been included in the tranche of ICPs from CTCT because they had switched to another trader.</p> <p>Two NW 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.</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		Remedial action status
<u>CTCT</u>		<p>Date:</p> <p>Identified</p>

<p>Two instances where incorrect NWs were sent due to user errors. Contact is continuously providing coaching to all users to ensure correct NW codes are used to resolve this non-compliance.</p> <p>For NA and SR breaches, as noted by auditors, most of these involve complex and lengthy investigations, hence some of these delays are unavoidable.</p> <p><u>CTCS</u></p> <p>This issue was the result of a project failure during the switching of sites from CTCT to CTCS which was done manually due to the number of ICPs involved. There was a time delay between generating the list of ICPs for switching and the actual switch process which resulted in these two being incorrectly included in our switch file. This project is completed now so we do not expect this issue to occur again.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>19/05/2021</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Ongoing coaching for the operators.</p> <p><u>CTCS</u></p> <p>This non-compliance was identified and noted in our project review and has been logged as a learning if ever bulk switching was to occur again in the future.</p> <p>Simply's generic switching processes is designed to avoid back dated withdrawals.</p>	<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>19/05/2021</p>	

Metering information	
Non-compliance	Description
<p>Audit Ref: 4.16</p> <p>With: Clause 21</p> <p>Schedule 11.3</p>	<p>CTCT</p> <p>One CS file did not reflect the actual reading or best estimate of an actual reading on the event date.</p> <p>CTCS</p> <p>One CS file did not reflect the actual reading or best estimate of an actual reading on the event date.</p>

From: 21-Jul-20 To: 01-Nov-20	Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong, as the processes in place are largely automated and the correct read or estimate is sent. This was an exception. There is no impact on settlement for CTCT because the switch was withdrawn and a minor potential impact on settlement for CTCS.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u> Contact is undertaking the review of this process and are actively engaging with our ToU MEPs to move the data collection from a ToU platform to an AMI data platform to provide this data in a CS file for HHR AMI ICP's. <u>CTCS</u> Simply Energy do not believe we can resolve these identified non compliances, so their focus is being put on implementing systems to minimise the re-occurrence of this non-compliance for arising in future. Please refer to preventative actions.	Date: <u>CTCT</u> Ongoing <u>CTCS</u> N/A	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> Contact is reviewing this process and will look to implement any process or system improvements identified. <u>CTCS</u> Simply Energy will run through a refresher training with staff. Automation of the Switch Loss process will be investigated: Simply Energy will look to introduce an automated workflow generated off the back of the switch loss record received from Registry. They will use this information to trigger Datahub to generate a final read (estimate or actual, depending on last actual read) which will be validated and sent back to CRM system. Further automation will be introduced to automatically	Date: <u>CTCT</u> Ongoing <u>CTCS</u> 31/01/2022	

generate the correct avg daily kWh based on the last two actual reads in accordance with the code. Simply Energy believes to resolve the inaccuracies they need to completely automate the entire Switch Loss process.		
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Unmetered threshold exceeded		
Non-compliance	Description	
<p>Audit Ref: 5.2</p> <p>With: Clause 10.14 (2)(b)</p> <p>From: 14-Jun-18</p> <p>To: 30-Nov-20</p>	<p>CTCT</p> <p>One standard unmetered ICP had an estimated annual consumption over 6,000 kWh per annum; and has now been metered.</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 strong with regard to identifying and attempting to resolve the any ICPs with loads that exceed the allowable threshold.</p> <p>There is no suggestion that settlement is inaccurate, therefore the impact is considered minor and the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p><u>CTCT</u></p> <p>This specifically relates to the expansion of retirement villages, where they are compliant & under 6,000 kwh but growth and expansion sees them become subject to stricter DUML requirements which may not be understood by site owners.</p> <p>We will actively work with the responsible account managers and our New Connections team to ensure they understand the over 6,000 kwh requirements.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>01/08/2021</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p><u>CTCT</u></p> <p>Refresher training will occur more regularly to ensure the responsible account managers and our New Connections team to ensure they understand the over 6,000 kwh requirements.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>01/08/2021</p>
		Identified

Unmetered threshold exceeded			
Non-compliance	Description		
<p>Audit Ref: 5.3</p> <p>With: Clause 10.14 (5)</p> <p>From: 14-Jun-18</p> <p>To: 30-Nov-20</p>	<p>CTCT</p> <p>One standard unmetered ICP has estimated annual consumption over 6,000 kWh per annum was not resolved within 20 business days.</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 strong as there are robust processes in place to monitor unmetered loads. In this instance it has taken longer than expected to get this load metered.</p> <p>There is no suggestion that settlement is inaccurate, therefore the impact is considered minor and 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 will actively work with the responsible account managers and our New Connections team to ensure they understand the over 6,000 kwh requirements.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing training and education</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>Refresher training will occur more regularly to ensure the responsible account managers and our New Connections team to ensure they understand the over 6,000 kwh requirements.</p>		<p>Date:</p> <p><u>CTCT</u></p> <p>Ongoing training and education</p>	

Distributed unmetered load	
Non-compliance	Description
<p>Audit Ref: 5.4</p> <p>With: Clause 11 of schedule 15.3</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>

From: 01-Jun-20 To: 30-Apr-21	Inaccurate submission information for several databases. Significant variances for CTCS databases submitted with a default 55 kWh per day. Some streetlight audits not submitted by the due date. Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls in place mitigate risk most of the time, therefore the control rating is moderate. 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.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT & CTCS</u> 1. Our systems allow for the submission of a daily volume of connected load. As and when we are provided this information by clients this will flow through into our submissions. 2. Once a material change audit for management of unmetered load (identified above) is approved for non-DST profile connections, we will submit accurate volumes in the revision files.		Proposed or actual date: <u>CTCS</u> 1. Ongoing 2. 30/06/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCS</u> 1. Simply Energy will continue to work closely with their clients to ensure we get sufficient information from their database to allow for a daily submission of volume. This includes supporting and enabling any new profiles approved by the EA for the submission of DUML volumes. 2. Simply will submit a material change process to Veritek related to our management of unmetered load within our current NHH submission process.		Proposed or actual date: <u>CTCS</u> 1. Ongoing 2. 30/06/2021	

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 01-May-20</p> <p>To: 30-Apr-21</p>	<p>CTCT</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 95 ICPs.</p> <p>Generation not quantified for 25 ICPs.</p> <p>CTCS</p> <p>One meter was bridged during the audit period.</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>Contact has progressively been reducing the volume of meter bridging by working closely with our AMI MEPS.</p> <p>We recognise that from Feb 2021 the function of meter bridging is recognised within the code under specific circumstances and while this may now mean that Contact is no longer in breach of the code, we will continue to try and reduce the need to bridge a meter in any scenario.</p> <p><u>CTCS</u></p> <p>Revised data has been calculated based on new usage and volumes will be reconciled in future R7 files, starting with May 2021 for October 2020 and ongoing thereafter.</p>		<p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>16/05/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<u>CTCS</u> Simply Energy have standing instructions to their MEPs and contractors to not bridge any meter without express instructions from Simply Energy's Senior Market Specialist. Simply Energy have reiterated this position with all parties.	Proposed or actual date <u>CTCS</u> 16/05/2021	
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Responsibility for metering at GIP			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 10.26 (6), (7) and (8) From: 02-Nov-20 To: 30-Nov-20	Late certification expiry updates for two points of connection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk to an acceptable level 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
Contact and our MEP (Accucal) have strong controls around monitoring GIP meter installation certification. This technical noncompliance is around the time taken to update the RM portal with new expiry dates and we will work with our MEP to improve the process to make these updates in a timely fashion		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will work with our MEP to improve the process to make these updates in a timely fashion		Ongoing	

Reporting of defective metering installations		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 10.43(2) and (3) From: 15-Jun-20 To: 30-Apr-21	CTCT The MEP was not advised of one bridged meter. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate, the MEP is advised of defects except where legacy meters are unbridged by Delta without being replaced. The audit risk rating is low because only one example was identified.	
Actions taken to resolve the issue		Completion date
CTCT Field Services investigation found that the Tech did not follow the correct administration process when they went to site twice in 24hrs, also, they did not note further work required was needed to recertify the meter by the MEP. We have reiterated to our field services providers of the correct process to follow in future.		Proposed or actual date: <u>CTCT</u> 14.04.2021
Preventative actions taken to ensure no further issues will occur		Completion date
<u>CTCT</u> The Despatch Manager for Delta has been notified of the above issue and will remind the field tech the correct process.		Proposed or actual date: <u>CTCT</u> 14.04.2021
Identified		

Reporting of defective metering installations	
Non-compliance	Description
Audit Ref: 6.6 With: Clause 3(1), 3(2) and 5 Schedule 15.2 From: 01-Jun-20 To: 30-Apr-21	CTCS Meter condition information is not routinely reviewed to identify issues with seals, tampering, phase failure or safety. Potential impact: Medium Actual impact: Low Audit history: None

	Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak because they are unlikely to mitigate risk most of the time. 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>CTCS</u> Please refer to preventative actions.			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCS</u> ADR currently provide Simply Energy with Meter Condition details in a standardised format. Simply Energy will introduce reporting (and supporting ETL processes) into their core operational workflow to identify ICP's on CTCS/X where the Meter Condition is flagged as an issue and requires investigation. Additionally, a workflow will be created to run analysis on any ICP's identified in reporting.		Proposed or actual date: <u>CTCS</u> 31/12/2021	

NHH reading application	
Non-compliance	Description
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 15-Jun-20 To: 05-Jan-21	CTCT Incorrect labelling of switch event meter readings. CTCS Incorrect labelling of switch event meter readings. Some readings not reflective of the readings agreed through the RR process. Potential impact: None Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 4
Audit risk rating	Rationale for audit risk rating
Medium	The controls are rated as moderate overall: <ul style="list-style-type: none"> CTCT's controls are strong and additional monitoring controls have been implemented for CTCT; users responsible for RR and AC files use the switch breach report as well as relying in BPEMs, and

	<ul style="list-style-type: none">CTCS controls are moderate, as there is room for improvement. <p>The impact is medium because the incorrectly recorded event reading in MADRAS has resulted in over submission of 26,829 kWh. The difference will wash out through the revision process once the error is corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> Contact's ICT team is investigating the system issue identified. Depending on the investigation, we anticipate having a system fix deployed by the end of August 2021 to resolve this non-compliance. <u>CTCS</u> Review of all RR files will take place to ensure that the correct information is held within both Datahub and Madras.		Date: <u>CTCT</u> 21/08/2021 <u>CTCS</u> 28/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> Contact's ICT team is investigating the system issue identified. Depending on the investigation, we are anticipating having a system fix deployed by the end of August 2021 to resolve this non-compliance. <u>CTCS</u> The RR process is to be fully automated and with NHH DA to be developed in Datahub this should remove these errors.		Date: <u>CTCT</u> 21/08/2021 <u>CTCS</u> 31/12/2021	

Interrogate meters once	
Non-compliance	Description
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Jun-20 To: 30-Apr-21	<p>CTCT</p> <p>For at least nine 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 four 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>

	Breach risk rating: 3		
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 nine months.</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
<u>CTCT</u> 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 harder to control, so we have raised a change initiative to look at viable options available through our new automation processes to start discussions earlier in the process with customers to provide access for us to gain an actual read and to provide regular access to site to improve future read attainment.		Proposed or actual date: <u>CTCT</u> Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> We have raised an internal change initiative to look at viable options in utilising an estimate included within the switching files to trigger a conversations piece with customers earlier on, to discuss with our customers providing access to obtain an actual read, and the need for providing regular access to improve the attainment of reads moving forward.		Proposed or actual date: <u>CTCT</u> Ongoing	

Identification of readings	
Non-compliance	Description
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 13-Jun-20 To: 20-Jan-21	<p>CTCT 7 incorrectly labelled switch event meter readings.</p> <p>CTCS 2 incorrectly labelled switch event meter readings.</p> <p>Potential impact: None Actual impact: Low Audit history: Three times Controls: Moderate 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 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 ICT team is investigating the system issue. Depending on the investigation, we are anticipating having a system fix deployed by end of August 2021 to resolve this non-compliance.</p> <p><u>CTCS</u></p> <p>Simply Energy do not believe they can resolve these identified non compliances, so a focus is being put on implementing systems to minimise the possibility of this non-compliance re-occurring in the future. Please refer to the preventative actions.</p>		<p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>21/08/2021</p> <p><u>CTCS</u></p> <p>N/A</p>	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>ICT team is investigating the system defect and we will implement a fix once the root cause is determined.</p> <p><u>CTCS</u></p> <p>Simply Energy will run through refresher training with staff.</p> <p>Automation of the Switch Loss process will be investigated: Simply Energy will look to introduce an automated workflow generated off the back of the switch loss record received from Registry. They will use this information to trigger Datahub to generate a final read (estimate or actual, depending on last actual read) which will be validated and sent back to CRM system. Further automation will be introduced to automatically generate the correct avg daily kWh based on the last two actual reads in accordance with the code. Simply Energy believes to resolve the inaccuracies we need to completely automate the switching process.</p>		<p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>21/08/2021</p> <p><u>CTCS</u></p> <p>31/01/2022</p>	

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-Jun-20</p> <p>To: 30-Apr-21</p>	<p>CTCS and CTCX</p> <p>EDMI provides HHR interval data for some ICPs rounded to two decimal places.</p> <p>NHH raw meter data received from all MEPs and agents except FCLM and WASN is rounded upon receipt into Datahub and not when volume information is created if it is provided with decimal places.</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: 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 considered weak, because all NHH meter information is rounded before it is entered into MADRAS where reconciliation submissions are calculated.</p> <p>The audit risk rating is low, because only NHH meter readings provided with decimal places are affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCS & CTCX</u></p> <p>No truncation is occurring at the Simply Energy end.</p> <p>The EDMT interval data is rounded only where there is a multiplier. The MEP's files for AMS, SMCO, Arc and IHUB were reviewed and all NHH files received contained 2 dp. HHR data is being submitted with 3 dp.</p> <p>The only reads truncated for Madras is switch reads and this is to match what goes to the Registry which they believe to be compliant.</p>		<p>Proposed or actual date:</p> <p><u>CTCS & CTCX</u></p> <p>18/05/2021</p>	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCS</u></p> <p>Simply Energy will request Arc, AMS, SMCO and Ihub to send NHH data in 3 dp to be consistent with their HHR data.</p>		<p>Proposed or actual date:</p> <p><u>CTCS & CTCX</u></p> <p>30/6/2021</p>	

Half hour estimates			
Non-compliance		Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Jun-20</p> <p>To: 30-Apr-21</p>		<p>CTCS</p> <p>Some HHR volumes estimates for CTCS did not meet the reasonable endeavours requirements.</p> <p>Some estimates are not replaced with actual data when it arrives.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</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 because there is a process in place, but some improvement is required to ensure compliance.</p> <p>The audit risk rating is medium, mainly due to the issue with actual data not replacing estimated data.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCS</u></p> <p>Where Simply Energy can identify actuals that can be uploaded to replace estimates they will do so - NB: This requires a tech change noted in the preventative actions.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCS</u></p> <p>1. The system estimate logic will be reviewed and updated to reflect a more appropriate methodology.</p> <p>Simply Energy’s system is currently rejecting data files for AMI connections that have HHR data supplied but no midnight read (register reads). They will adjust this workflow so these files are accepted.</p>		<p>Proposed or actual date:</p> <p><u>CTCS</u></p> <p>1. 31.07.2021</p> <p>2. 31.12.2021</p>	

Electronic meter readings and estimated readings			
Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: Clause 17(4)(f)&(g) of schedule 15.2</p> <p>From: 01-Jun-20</p> <p>To: 30-Apr-21</p>	<p>CTCS & CTCX</p> <p>AMI event logs are not routinely reviewed.</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 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>CTCS & CTCX</u></p> <p>Simply Energy will be putting a focus on the preventative actions.</p>			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCS & CTCX</u></p> <p>Simply Energy will look to enhance our Third Party Platform (Datahub) to import AMI Event Logs into each DataStream.</p> <p>Reporting will then be created based on the requirements and validation flags can be added for ICP specific information.</p>		<p>Proposed or actual date:</p> <p><u>CTCS and CTCX</u></p> <p>31.01.2022</p>	

Calculation of ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Jun-20</p> <p>To: 30-Apr-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>DUML ICPs do not have ICP days submitted.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>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 all non DST profile controls are sound.</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
<p><u>CTCT</u></p> <p>ICP days were not reported correctly where settlement unit assignment configuration was incorrect in SAP, or a system defect resulted in an incorrect submission type being applied. We are still trying to identify the root cause of this issue so a full system fix can be implemented.</p> <p>Contact has been working to resolve these issues before revision 14, and the ICP days differences are generally small.</p> <p><u>CTCS</u></p> <p>Once the material change process is approved, Simply Energy will back date the implementation to ensure revision files have accurate ICPDays, including the respective ICPDays for DST Profiled connections.</p> <p>They will review washup recon submissions from June 2021 to ensure ICP Days are correct.</p>		<p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>TBA</p> <p><u>CTCS</u></p> <p>31.07.2021</p>
		Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> We are still trying to identify the root cause of this issue so a full system fix can be implemented.	Proposed or actual date: <u>CTCT</u> Ongoing	
<u>CTCS</u> Simply will submit a material change process to Veritek related to our management of unmetered load within our current NHH submission process - this will include the submission of ICPDays for DST profiled DUML connections.	<u>CTCS</u> 30.06.2021	

Electricity supplied information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.3 With: Clause 15.7 From: 01-Mar-20 To: 30-Nov-20	CTCX The Mar-20 to Nov-20 billed volumes are inconsistent with the Mar-20 to Nov-20 submission volumes. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate overall. For CTCX controls are rated as moderate, as the reasons for the difference could not be determined. The files are generated from AXOS, and there are monitoring controls in place. The impact is low, because the AV120 submission is used to check the reasonableness of NHH and HHR volumes submissions and has no impact on reconciliation results.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCX</u> Detailed analysis will be completed to determine source the of the discrepancy noted (Submission or billing). Actions for resolution will be decided upon once the above is completed.		Proposed or actual date: <u>CTCX</u> 28/5/2021	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCX</u> Simply will upgrade our RM Submission analysis tool to cover the AV120 files	Proposed or actual date: <u>CTCX</u> 30/9/2021	

HHR aggregates file			
Non-compliance	Description		
Audit Ref: 11.4 With: Clause 15.8 From: 01-Jun-20 To: 30-Apr-21	<p>CTCT</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>Some ICPs were missing from submissions due to incorrect settlement unit data or delays in creating profiles to store HHR data. Revised data will be provided through the revision process.</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: 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 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
<u>CTCT</u> HHR aggregates file does not contain electricity supplied information. 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.		Proposed or actual date: <u>CTCT</u> 1/06/2021 <u>CTCS & CTCX</u>	Identified

<p>Some ICPs missing:</p> <p>HHR and NHH settlement functions were split across to teams which has lead to some duplication of effort and also some corrections not being processed in a timely manner even with reporting exception improvements we have implemented since the last audit.</p> <p>We are now transitioning all CTCT submission tasks into a single team during May and June 2021 to ensure there is an enhanced level of governance and oversight of the exception corrections process.</p> <p><u>CTCS & CTCX</u></p> <p>Simply Energy 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 there will be the opportunity for further discrepancies to arise.</p>	18.05.2021	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>We are now transitioning all CTCT submission tasks into a single team during May and June 2021 to ensure there is an enhanced level of governance and oversight of the exception corrections process.</p> <p>ICP - 0000014413HB0E4</p> <p>This ICP was impacted by 2 separate issues that our system does not handle well. The first issue relates to the withdrawal of a switch loss where Contact was settling the ICP as HHR. In this scenario our system was not reinstating the settlement unit assignment on completion of the switch loss withdrawal. We have now resolved this system defect and we do not see this issue occurring in more recent submissions.</p> <p>The second issue relates to back dated network events for a change of NSP where our SAP system has already billed past the back dated network event. Our SAP system applies billing locks to core data that may have been used in the billing process and the NSP field is one such field. The result is this network event did not get processed and we are then required to manually correct the set up in SAP. This manual correction was only applied 3 months after the failed network event.</p>	<p>Proposed or actual date:</p> <p>CTCT</p> <p>June 2021</p> <p><u>CTCS & CTCX</u></p> <p>19/05/2021</p>	

<p>We have submitted a system change request to resolve this issue and we are awaiting funding approval from our project council before development can begin. In the interim we have increased the frequency of our exception monitoring and manual correction to reduce the likelihood of this issue occurring again.</p> <p>Given both NSPs were part of the same balancing area we believe there was no market impact in terms of settlement and ICP days comparison.</p> <p><u>CTCS & CTCX</u></p> <p>No further action is required on this issue.</p>		
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Creation of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-Jun-20</p> <p>To: 30-Apr-21</p>	<p>CTCT</p> <p>Some ICPs were missing from submissions due to incorrect settlement unit data or delays in creating profiles to store HHR data.</p> <p>CTCS</p> <p>Submission did not occur for both ICPs at KAI1101 for the DST profile for the Day-4 submission for October 2020.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</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:</p> <ul style="list-style-type: none"> for CTCT system changes have been made, and further changes are underway to address remaining issues, and for CTCS, more robust controls are now in place. <p>The impact is medium based on the volume differences identified, and corrected 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>HHR and NHH settlement functions were split across to teams which has led to some duplication of effort and some corrections</p>		<p>Proposed or actual date:</p> <p>CTCT</p>	Identified

<p>not being processed in a timely manner even with reporting exception improvements we have implemented since the last audit.</p> <p>We are now transitioning all CTCT submission tasks into a single team during May and June 2021 to ensure there is an enhanced level of governance and oversight of the exception corrections process.</p> <p><u>CTCS</u></p> <p>The NHH volumes were submitted however the Profile shape file was not submitted. We expected in this circumstance that with the absence of the DST shape that the RM would have defaulted to RPS shape and still reconciled the volumes.</p> <p>Upon identification of the non-compliance we provided the RM with a shape file.</p>	<p>June 2021</p> <p><u>CTCS</u></p> <p>02.10.2021</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>We are now transitioning all CTCT submission tasks into a single team during May and June 2021 to ensure there is an enhanced level of governance and oversight of the exception corrections process.</p> <p><u>CTCS</u></p> <p>Simply Energy have updated our RM Submission process so that checks are now in place to ensure a profile shape file is submitted for each NSP Volume submission</p>	<p>Proposed or actual date</p> <p><u>CTCS</u></p> <p>03.04.2021</p>	

Allocation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.3</p> <p>With: Clause 15.5</p> <p>From: 01-Apr-20</p> <p>To: 31-Oct-20</p>	<p>CTCT</p> <p>ICP 0000014413HB0E4 was missing from the April 2020 aggregates file until the 3-month revision in July 2020, then it was submitted against the incorrect NSP.</p> <p>CTCS</p> <p>Zeroing did not occur for July and October 2020 for 19,317 kWh in total.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p>

	Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	<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 on settlement and participants is moderate; therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> <p>This ICP was impacted by 2 separate issues that our system does not handle well. The first issue relates to the withdrawal of a switch loss where Contact was settling the ICP as HHR. In this scenario our system was not reinstating the settlement unit assignment on completion of the switch loss withdrawal. We have now resolved this system defect and we do not see this issue occurring in more recent submissions.</p> <p>The second issue relates to back dated network events for a change of NSP where our SAP system has already billed past the back dated network event. Our SAP system applies billing locks to core data that may have been used in the billing process and the NSP field is one such field. The result is this network event did not get processed and we are then required to manually correct the set up in SAP. This manual correction was only applied 3 months after the failed network event.</p> <p>We have submitted a system change request to resolve this issue and we are awaiting funding approval from our project council before development can begin. In the interim we have increased the frequency of our exception monitoring and manual correction to reduce the likelihood of this issue occurring again.</p> <p>Given both NSPs were part of the same balancing area we believe there was no market impact in terms of settlement and ICP days comparison.</p>		Proposed or actual date: CTCT June 2021 <u>CTCS</u> 20.12.2021	Investigating
<u>CTCS</u> <p>These will be resolved at the next possible occurrence (R14 for both months)</p>			
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u>		Proposed or actual date:	

<p>We are now transitioning all CTCT submission tasks into a single team during May and June 2021 to ensure there is an enhanced level of governance and oversight of the exception corrections process.</p> <p><u>CTCS</u></p> <ol style="list-style-type: none"> 1. While Simply Energy continue to use MADRAS for NHH DA, they have added in a step to the process in the file review to identify and report back on any NSPs that are required to be zeroed out in revision files. 2. The zeroing of volumes is an automated process within the Datahub system Our plan is to move NHH DA to Datahub which will stop this being a non-compliance once this change takes place. 	<p>CTCT</p> <p>June 2021</p> <p><u>CTCS</u></p> <p>31.07.2021</p> <p>31.01.2022</p>	
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Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Jun-20</p> <p>To: 30-Apr-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: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<p>High</p>	<p>The CTCT controls are strong, but the CTCS controls are still weak in many areas. Some high level controls have led to improvements but improvements are still required. 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 many instances.</p>	
Actions taken to resolve the issue		Remedial action status
<p><u>CTCT</u></p> <p>NHH volumes:</p> <p>Consumption on disconnected ICPs:</p> <p>Contact has reporting in place to identify any instance of this occurring and is resolving these at the earliest opportunity.</p>		<p>Investigating</p> <p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>Ongoing</p>

<p>Corrections:</p> <p>These are now being investigated and resolved.</p> <p>Profiles:</p> <p>Contact is continuing to work with the MEP to ensure LCD flags are correctly reflecting that actual certification status of this equipment. We are now focusing on expired certified ICPs with the relevant MEP.</p> <p>HHR Volumes and Aggregates:</p> <p>HHR and NHH settlement functions were split across to teams which has led to some duplication of effort and some corrections not being processed in a timely manner even with reporting exception improvements we have implemented since the last audit.</p> <p>We are now transitioning all CTCT submission tasks into a single team during May and June 2021 to ensure there is an enhanced level of governance and oversight of the exception corrections process.</p> <p>ICP Days:</p> <p>Our SAP support team are investigating the issues around settlement unit assignments that are causing ICP days / settlement volume inaccuracies.</p> <p><u>CTCS/CTCX</u></p> <p>Simply Energy will be able to identify and resolve these inaccuracies on Future revision files due to the preventative actions already put in place.</p>	<p><u>CTCS/CTCX</u></p> <p>30.06.2021</p>	
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Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCS/CTCX</u> Simply have implemented a new analysis tool for the purpose of RM Submission that allows us to quickly and accurately identify any inaccurate volume or ICPDays submissions.	Proposed or actual date: <u>CTCS/CTCX</u> 15/06/2021	

Permanence of meter readings			
Non-compliance	Description		
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Jul-19 To: 30-Sep-19	CTCT 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. The impact is rated as low. There was 905,828 kWh of forward estimate over three months and the impact is dependent on the accuracy of these estimates. The July 19 issue was a one-off. There are sound estimation processes, therefore I have recorded the audit risk rating as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> The July 2019 volume was a one off over reporting issue relating to phantom meters not being removed for our submission data - a full system fix has now been applied so this issue does not now occur since July 2019 as can be seen in the table below identifying FE at 14 months since July 2019. Contact is continuing to focus on long term no access properties process in order to improve our submission completeness. FE at 14 months 201907 622,666 201908 162,611 201909 120,511 201910 103,824		Proposed or actual date: <u>CTCT</u> Ongoing	Identified

201911 101,358 201912 107,843 202001 72,067 202002 62,758 202003 58,756		
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> Contact is continuing to focus on long term the no access properties process in order to improve our submission completeness.	Proposed or actual date: <u>CTCT</u> Ongoing.	

Reconciliation participants to prepare information			
Non-compliance	Description		
Audit Ref: 12.9 With: Clause 2(1)(c) of schedule 12.3 From: 01-Oct-20 To: 30-Apr-21	CTCS Unmetered load consumption is not calculated from the daily kWh figure in the registry multiplied by the number of days. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are moderate to strong in general for this section, but there are no systems, processes or controls in place for CTCS unmetered load submissions, therefore I have recorded the controls as weak overall. The impact on settlement is over submission of over 1.4 GWh for standard and shared unmetered load and under submission of over 800,000 kWh for DUML; therefore, the audit risk rating is high.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCS</u> Once the material change process is approved, Simply Energy will back date the implementation to ensure revision files have accurate ICPDays, including the respective ICPDays for DST Profiled connections.		Proposed or actual date: <u>CTCS</u> 31.07.2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

<u>CTCS</u> Simply will submit a material change process to Veritek related to our management of unmetered load within our current NHH submission process - this will include the submission of ICPDays for DST profiled DUML connections.	Proposed or actual date" <u>CTCS</u> 30.06.2021	
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Historical estimates and forward estimates			
Non-compliance	Description		
Audit Ref: 12.10 With: Clause 3 Schedule 15.3 From 1/6/20 To: 30-Apr-21	CTCS and CTCX Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate. Potential impact: None Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because historic and forward estimate is correctly identified most of the time. There is no impact on settlement because the calculation is correct; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCS & CTCX</u> Unfortunately, Simply Energy cannot resolve this while using MADRAS as our NHH DA. This issue will continue to be a non-compliance until such time as we move to Datahub as our NHH DA (see preventative actions).		Proposed or actual date: <u>CTCS & CTCX</u> N/A	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCS & CTCX</u> Simply Energy plans to move NHH Data Admin to Datahub, this will resolve this issue.		Proposed or actual date: <u>CTCS & CTCX</u> 31.01.2022	

Forward estimate accuracy

Non-compliance	Description		
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: 01-Oct-19</p> <p>To: 30-Jun-20</p>	<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 several revisions due to the large number of estimates during early revisions and that most estimates were based on 55 kWh per day which is too high for residential and too low for commercial. When the tranches were switched in, there was no history from CTCT to base the estimates on.</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 strong for CTCT but are weak for CTCS because 55 units per day for residential and commercial is not a suitable estimate. Over all the controls are rated as moderate.</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>Contact has now implemented a process to use the month end midnight AMI reads as a source to calculate FE volumes from the last validated meter read to the end of the consumption month. As this read has not undergone all validations required for it to be considered a validated meter read Contact labels this consumption up to month end as FE.</p> <p>We have noticed an improvement in our initial submission accuracy as a consequence which will materially reduce the likelihood of Contact not meeting this accuracy requirement.</p> <p><u>CTCS</u></p> <p>The 55kwh estimate default is a system limitation within Madras that gets applied to sites where Simply Energy have not yet received an actual read. This issue unfortunately will continue to be a risk until such time as they move to Datahub as their NHH DA (see preventative actions).</p>		<p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>N/A</p>	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

<p><u>CTCS</u></p> <p>The 55kwh estimate default is a system limitation within Madras that gets applied to sites where we have not yet received an actual read. Simply Energy will be able to be more specific on our forward estimate values so that they are aligned to the expected volumes when we transition to using Datahub as our NHH DA system</p> <p>They are also working with ADR to tighten their processes around no read events so that they resolve issues in a timelier manner.</p>	<p>Proposed or actual date:</p> <p><u>CTCS</u></p> <p>31.01.2022</p>	
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Historical estimate reporting to RM			
Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: 01-Jun-19</p> <p>To: 30-Apr-21</p>	<p>CTCT</p> <p>Historic estimate thresholds were not met for some revisions.</p> <p>CTCS</p> <p>Low proportion of HE for many months.</p> <p>CTCX</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: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>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.</p> <p>The audit risk rating is medium, because the lack of actual data for CTCS leads to inaccurate submissions, as recorded in section 12.7.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We continue to work with our non-AMI meter reading provider to improve read attainment and to also targeting the long term no access properties.</p> <p><u>CTCS</u></p> <p>Simply Energy are working with meter read provider AD Riley to regularly review and resolve all ICPs that have had no actual read greater than 120 days</p>		<p>Proposed or actual date:</p> <p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>Ongoing</p>	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCS</u> Simply Energy's processes with ADR are under review and actions to tighten our process with them will fall out of that review.	Proposed or actual date: <u>CTCS</u> 31.08.2021	