

# Compliance plan for Powershop RP – 2020

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>A small number of registry discrepancies were identified.</p> <p>HHR ICPs do not have the HHR profile recorded.</p> <p>Four unmetered ICPs do not have registry details populated.</p> <p>Three ICPs with fuel type of “other” have the PV1 profile.</p> <p>HHR data from ARC meters is not compliant.</p> <p>Potential impact: Medium</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	
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time.</p> <p>The impact on settlement and participants is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Unmetered ICPs - Corrections have been processed for the 4 ICP identified. Further information is noted in sections 3.7 and 5.1.</p> <p>HHR Profile – ICPs being submitted as HHR will be reverted back to NHH submission and RPS profile from 1<sup>st</sup> September 2020.</p> <p>Fuel type “other” with PV1 profile – these ICPs are solar DG with back up storage battery. We understand PV1 is the correct profile for these ICPs.</p> <p>Arc HH meters - we are following up with Arc regarding this issue and impact on the HH certification of these meters. ICPs being submitted as HHR will be reverted back to NHH from 1<sup>st</sup> September 2020.</p>		<p>Complete</p> <p>1 Sept 2020</p> <p>N/A</p> <p>1 Sept 2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Prior to HH settlement of ICPs in the future we will;</p> <ol style="list-style-type: none"> <li>1) ensure process/systems are in place to update the Registry with the HHR profile.</li> <li>2) Confirm HH certification status for any Arc meters</li> </ol>		1 May 2021

Electrical Connection of Point of Connection			
Non-compliance	Description		
Audit Ref: 2.11 With: Clause 10.32  From: 01-Aug-19 To: 25-Jul-20	64 reconnections were not certified within five business days. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are strong because there are processes in place to request meter certification for both new connections and reconnections. The MEPs do not always complete certification on request.  Uncertified metering installations are likely to be less accurate than certified metering installations, so there could be a minor impact on settlement. The audit risk rating is recorded as low because the number and proportion of connections affected is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Powershop is not able to resolve the certification of the reconnected ICPs.		N/A	Unknown
Preventative actions taken to ensure no further issues will occur		Completion date	
Powershop will continue with its controls in this area		Ongoing	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 01-Aug-19 To: 25-Jul-20	Registry not updated within five business days of the event for status and trader updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate, timeliness has improved during the audit period and a large proportion of the late updates occurred early in the period or delays were contributed to by other parties.  There was a minor effect on settlement; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All incorrect event dates identified have been corrected.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
With regard to processing errors where a step was missed to update the Registry – these were as a result of a process change that some agents had not been made aware of. All agents have been trained on the additional process step required.  Work to automate job processing including update of the Registry is scheduled to begin in October 2020. This will eliminate the requirement for a manual process step and potential for human error in this process.		Complete  April 2021	

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 01-Aug-19</p> <p>To: 25-Jul-20</p>	<p>61 late updates to active status.</p> <p>ICP 1002055962LC7E7 had active status applied from 12/11/18 on the registry, instead of 20/02/19.</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	
<b>Low</b>	<p>This area has strong controls and the late updates identified were generally caused by late receipt of information.</p> <p>The audit risk rating is low, because the impact on settlement is minor.</p>	
Actions taken to resolve the issue		Completion date
The incorrect event dates have been corrected for the 2 ICPs identified this audit. We are working through correction of ICP 1002055962LC7E7.		31 Aug 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Powershop is satisfied with controls in this area.		N/A
		Identified

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Aug-19</p> <p>To: 25-Jul-20</p>	<p>Four ICPs with unmetered load do not have the UNM flag set to Y, and trader unmetered load details and daily unmetered kWh populated on the registry.</p> <p>One ICP has the incorrect daily kWh</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time.</p> <p>There is a minor impact, because some trader unmetered load details are incorrectly recorded on the registry, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Corrections have been processed for all ICPs identified.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
The failed Registry updates were identified as a result of human error when attempting to process the corrections for the ICPs and was not systemic. This has now been resolved.		Complete
Review of UML discrepancies is now included in monthly compliance monitoring processes.		Ongoing

Management of “active” status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 01-Aug-19</p> <p>To: 25-Jul-20</p>	<p>Two ICPs have incorrect active dates applied in Flux and on the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>This area has strong controls and the late updates identified relate to isolated circumstances.</p> <p>The audit risk rating is low, because the impact on settlement is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
ICP 0000530696TU89C is corrected and we are working through correction of ICP 1002055962LC7E7		31 Aug 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Review of active date discrepancies is included in monthly compliance monitoring processes.</p> <p>Work to automate job processing including update of the Registry is scheduled to begin in October 2020. This will eliminate the requirement for a manual process step and potential for human error in this process.</p>		<p>Ongoing</p> <p>April 2021</p>	

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Aug-19</p> <p>To: 25-Jul-20</p>	<p>Four ICPs had incorrect inactive status dates applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls have been strengthened during the audit period to ensure all status changes are appropriate so that submission occurs. Some manually updated status changes had incorrect event dates and controls require improvement in this area.</p> <p>The impact is low, because the impact on settlement and participants is minor and a small number of ICPs are affected.</p>	
Actions taken to resolve the issue		Completion date
Corrections have been processed for the 4 ICPs with incorrect inactive dates identified.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Work to automate job processing including update of the Registry is scheduled to begin in October 2020. This will eliminate the requirement for a manual process step and potential for human error in this process.		April 2021

Inform registry of switch request for ICPs - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 2</p> <p>Schedule 11.3</p> <p>From: 26-Aug-19</p> <p>To: 23-Apr-20</p>	<p>Two NTs were issued as transfer switches, when a switch move should have been applied.</p> <p>One NT had the incorrect switch date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as strong, because the process is compliant, and three exceptions occurred due to a data processing error.</p> <p>The impact is assessed to be low. The switch was completed as requested, and there would be a very minor impact on the Authority's reporting on switch types.</p>	
Actions taken to resolve the issue		Completion date
The incorrect switch types are unable to be resolved now without withdrawing the switches which would impact the customer.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Incorrect switch type is generally a result of human error when a pre-selected variable is not updated during the sign-up process. Currently this variable is pre-selected to one which triggers a TR switch by default.</p> <p>A system change has been requested to change this so there is no default selection on this variable prompting agents to have to confirm and select which variable applies rather than skip the step.</p>		April 2021
		Identified



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: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>One transfer CS contained an incorrect read type.</p> <p>One transfer CS had the incorrect reading, one day too early.</p> <p>Average daily kWh in the CS is not calculated in accordance with the Registry Functional Specification.</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		
<b>Low</b>	<p>The controls are rated as moderate because they mitigate risk most of the time, but some improvements are required.</p> <p>There is no impact on settlement and a minor impact on other participants. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Powershop is unable to resolve the issues identified without withdrawing the switches which would have a material impact on other parties and the customer.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A change to time stamping for AMS/SMCO reads has resolved the previously identified issue regarding use of reads one day prior to the switch being used as the switch event meter read.</p> <p>We will review the functionality in Flux to enable correction of the read type when amending a switch read.</p> <p>While differing in some instances from the functional specification we consider calculation of average daily kWh in our CS files is materially accurate. Given this and the recommendation from the switching reform technical group to remove this field from switching files we intend to hold off reviewing this calculation for the time being.</p>		<p>26 April 2020</p> <p>April 2021</p> <p>N/A</p>	

Retailers must use same reading - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>Two late RR files for transfer switches.</p> <p>Three RR files had estimates labelled as actuals.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate overall. Most RRs were on time.</p> <p>The impact on settlement and other participants is minor, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Powershop has strengthened controls in relation to the RR process through monthly monitoring of all RR's sent and follow up training where needed.</p> <p>The RR process in Flux will be reviewed with respect to the recording of the read type</p>		<p>Ongoing</p> <p>April 2021</p>	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3  From: 01-Aug-19 To: 03-Jun-20	At least one late NT file. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
The NT file was sent as soon as the processing issue was identified.		
Preventative actions taken to ensure no further issues will occur		Completion date
Powershop is satisfied with controls in this area		
		Identified

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1)</p> <p>Schedule 11.3</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>Five ANs had proposed event dates more than ten business days after the NT receipt date and did not match the gaining trader's requested date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are strong.</p> <p>For the five ICPs with event dates more than ten business days after NT receipt, Powershop believed that the date requested by the gaining trader was incorrect, and also issued a withdrawal.</p> <p>The impact is assessed to be low, because all affected switches were withdrawn.</p>	
Actions taken to resolve the issue		Completion date
Withdrawals were issued for all ICPs following the AN		
Preventative actions taken to ensure no further issues will occur		Completion date
Powershop is satisfied with existing controls in this area		
		Identified

Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 01-Aug-19 To: 21-Jul-20</p>	<p>Five late switch move CS files.</p> <p>One switch move CS contained an incorrect read type.</p> <p>One switch move CS contained an incorrect read type, and an incorrect date of last reading.</p> <p>Average daily kWh in the CS is not calculated in accordance with 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		
<b>Low</b>	<p>The controls are rated as moderate because they mitigate risk most of the time. The average daily kWh appeared reasonable.</p> <p>There is no impact on settlement and a minor impact on other participants. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Powershop is unable to resolve these issues without reversing the switches which would have a material impact on other parties and the customer.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A change to time stamping for AMS/SMCO reads has resolved the issue re use of reads one day prior to the switch being used as the switch event meter read.</p> <p>We will review the functionality in Flux to be able to correct the read type if required when amending a switch read.</p> <p>While differing in some instances from the functional specification we consider calculation of average daily kWh in our CS files is materially accurate. Given this and the recommendation from the switching reform technical group to remove this field from switching files we intend to hold off reviewing this calculation for the time being.</p>		<p>April 2020</p> <p>April 2021</p> <p>N/A</p>	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>17 late RR files for switch moves.</p> <p>Three RR files had estimates labelled as actuals.</p> <p>Four RR files from HHR only traders were incorrectly rejected.</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 because there is room for improvement with the labelling of readings and ensuring that valid RRs are not rejected.</p> <p>The impact is low because the incorrect kWhs for the incorrectly rejected RRs was only 47 kWh. There is a minor impact on customers and other traders.</p>	
Actions taken to resolve the issue		Completion date
<p>Late RR's were issued with valid reason and for the benefit of our customer to ensure they were correctly billed.</p> <p>The cause of the incorrectly rejected RR's was identified as a training issue in relation to a single agent and this was addressed with the agent at the time when identifies through monthly monitoring.</p>		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Powershop has strengthened controls in relation to the RR process though monthly monitoring of all RR's sent and follow up training provided where needed.</p> <p>The RR process in Flux will be reviewed with respect to the recording of the read type</p>		<p>Ongoing</p> <p>April 2021</p>
		Identified

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-Aug-19</p> <p>To: 21-Jul-20</p>	<p>49 NWs were issued more than two calendar months after the switch date.</p> <p>Two incorrect NW codes used.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as strong. The sample of late NWs checked found that in most cases the delay was due to an investigation being completed prior to issuing the withdrawal request or other traders rejecting valid withdrawals.</p> <p>The audit risk rating is low. There was a minor impact on settlement due to the correction of consumption information. There was also only a minor impact on the customer.</p>	
Actions taken to resolve the issue		Completion date
The late NW's were issued with valid reason		
Preventative actions taken to ensure no further issues will occur		Completion date
Powershop is satisfied with its existing controls in this area.		
		Identified

Metering information			
Non-compliance	Description		
Audit Ref: 4.16 With: Clause 21 Schedule 11.3  From: 01-Aug-19 To: 21-Jul-20	Two CS files had an incorrect switch readings. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as strong, because they ensure errors are at an acceptable level.  There was a small impact on the customer and other participants. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer comment in sections 4.3 and 4.10 re actions taken to address accuracy of switch reads in the CS file.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	



Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 11.14</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>Four ICPs with unmetered load do not have the UNM flag set to Y, and trader unmetered load details and daily unmetered kWh populated on the registry.</p> <p>One ICP with incorrect daily kWh.</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 recorded as moderate because they mitigate risk most of the time but did not identify the missing unmetered load details on the registry.</p> <p>There is a minor impact, because some trader unmetered load details are incorrectly recorded on the registry, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Corrections have been processed for all ICPs identified.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
The failed Registry updates were identified as a result of human error when attempting to process the corrections for the ICPs and was not systemic. This has now been resolved.		Complete
Review of UML discrepancies is now included in monthly compliance monitoring processes.		Ongoing

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>While meters were bridged, energy was not metered and quantified according to the code for 19 ICPs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>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. All bridged meters reviewed had corrections processed to capture consumption during the bridged period.</p>	
Actions taken to resolve the issue		Completion date
All meters have been unbridged.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Bridging of metering to restore a customer's power will continue to occur where this is necessary. Processes in place to ensure meters are unbridged and account for consumption used during any bridged period will continue.		Ongoing
		Identified

Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clause 3(2) of Schedule 15.2</p> <p>From: 09-Apr-20</p> <p>To: 09-Apr-20</p>	<p>Customer readings supplied by Wells labelled as “Verified, Actual”.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as strong. This was a one-off issue during exceptional circumstances.</p> <p>The audit risk rating is low. Validation occurred in the Wells hand-held devices and in Flux.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As reported, customer reads obtained by Wells were validated prior to use through both Wells systems and Flux including against any other actual reads previously obtained. Powershop does not intend to re classify these readings given the low risk and one-off nature of the event.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Powershop will ensure that if customer reads are obtained using a similar process in the future for any reason that these are reported as customer reads rather than actual reads.			

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>For at least 12 ICPs unread during the period of supply, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>A process is not in place for ICPs supplied by Powershop for a short period. If the period is longer the controls are moderate.</p> <p>The impact on settlement from an estimate for a short period is minor, therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>As ICPs have switched away no action is able to be taken.</p> <p>We have re-instated the manual processes for following up instances of continued no reads which had lapsed for a period.</p>		<p>N/A</p> <p>July 2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Powershop is working with Meridian and Flux to implement "no read" processes within the Flux system that meet best endeavours requirements.</p>		<p>April 2021</p>

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Aug-19</p> <p>To: 21-Jul-20</p>	<p>For at least six ICPs unread in the previous 12 months, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p>January 2020 meter read frequency report sent late.</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	
<b>Low</b>	<p>The controls are assessed to be moderate. A process is in place, but customer contact is manually initiated, and is not consistently applied for each affected ICP.</p> <p>The impact is assessed to be low. The use of estimates may have a minor impact on settlement, and overall read attainment is high.</p>	
Actions taken to resolve the issue		Completion date
<p>We have re-instated the manual processes for following up instances of continued no reads which had lapsed for a period.</p> <p>The sending of the Jan 2020 meter reading report was missed due to human error and was provided as soon as the issue was identified.</p>		<p>July 2020</p> <p>18 March 2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Powershop is working with Meridian and Flux to implement "no read" processes within the Flux system that meet best endeavours requirements.</p>		<p>April 2021</p>
		Identified

NHH meters 90% read rate			
Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 01-Apr-20</p> <p>To: 30-Apr-20</p>	<p>For at least six ICPs unread in the previous four months, the best endeavours requirements were not met, and exceptional circumstances did not exist.</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		
<b>Low</b>	<p>The controls are assessed to be moderate. A process is in place, but the best endeavours requirements are not usually met within four months.</p> <p>The impact is assessed to be low. The use of estimates may have a minor impact on settlement. Only NSPs with very small numbers of customers do not achieve 90% read attainment, and overall read attainment is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have re-instated the manual processes for following up instances of continued no reads which had lapsed for a period.		July 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Powershop is working with Meridian and Flux to implement "no read" processes within the Flux system that meet best endeavours requirements.		April 2021	

Identification of readings			
Non-compliance	Description		
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2  From: 01-Aug-19 To: 21-Jul-20	Actual readings labelled as estimates for three ICPs. Estimated readings labelled as actuals for Six ICPs. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate because it appears there are many examples of incorrect labelling of readings in the RR process.  The risk as low, because the readings were correct but there is a small impact on other traders.		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer comments in sections <b>4.3, 4.4, 4.10</b> and <b>4.11</b> .			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Powershop will review the functionality in Flux to be able to correct the read type if required when amending reads in the switching process.		April 2021	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 of part 15 From: 01-Aug-19 To: 21-Jul-20	HHR aggregates file does not contain electricity supplied information. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The issue relating to content of the aggregates file is an error in the code, Powershop is providing submission information as expected.	
Actions taken to resolve the issue		Completion date
Powershop will not be taking any action in relation to this technical non-compliance. We understand a Code change is progressing to resolve this.		
Preventative actions taken to ensure no further issues will occur		Completion date
		Remedial action status
		Unknown



Allocation of submission information		
Non-compliance	Description	
Audit Ref: 12.3 With: Clause 15.5  From: 01-Jul-19 To: 31-Aug-19	ICP 0006886795RN35A had submission against the incorrect NSP for July and August 2019. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
The NSP for ICP 0006886795RN35A will be corrected on submission of the R14 for Jul and Aug 19.		Oct 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Powershop is satisfied with existing controls in this area.		
		Identified

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12  From: 01-Jun-18 To: 21-Jul-20	Unmetered load incorrectly submitted for ICP 0007188620RN4C7 Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time. I found that most corrections had been processed as required. The impact on settlement and participants is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Removal of UML for this ICP, which was present on switch in, will be confirmed with the distributor and corrected.		30 Sept 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Powershop is satisfied with existing controls in this area.		

Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: Clause 4 of Schedule 15.2</p> <p>From: 01-Dec-18</p> <p>To: 31-Jan-19</p>	<p>Some estimates are not replaced at R14.</p> <p>Some incorrect labelling of historic estimate as forward estimate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are considered moderate because meter reading processes are strong leading to a very small proportion of FE still existing at 14 months.</p> <p>The audit risk rating is low because the use of estimates may have a minor impact on settlement.</p>	
Actions taken to resolve the issue		Completion date
<p>Powershop will investigate solutions for use of permanent estimates where reads can have not been obtained within 14 months.</p> <p>Powershop will investigate the other instances of FE still existing at 14 months identified and determine if any further changes feasible.</p>		<p>July 2021</p> <p>July 2021</p>
Preventative actions taken to ensure no further issues will occur		Completion date
		Investigating

Historical estimate reporting to RM			
Non-compliance	Description		
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: 01-Dec-18 To: 31-Dec-19	Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Strong controls are in place to get actual or customer readings to derive submission information. The impact on settlement is minor, therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Powershop has strong controls in place that will continue. See also comments outlined in sections <b>6.9</b> and <b>12.8</b> that relate to the proportion of HE remaining at 14 mths.			