

Compliance plan for Simply Energy – 2021

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2 & 15.2</p> <p>From: 1-Jul-20</p> <p>To: 30-Apr-21</p>	<p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as weak because they have not been minimising risk to an acceptable level.</p> <p>The audit risk rating is assessed to be high based on the impact on submission accuracy and other participants.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/21
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such, and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/21
		Identified

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 22-Jul-20</p> <p>To: 30-Apr-21</p>	<p><i>SIMP</i></p> <p>Two new connections were not certified within five business days of the initial electrical connection.</p> <p>One reconnection was not certified within five business days of the initial electrical connection.</p> <p><i>SELS</i></p> <p>One new connection was not certified within five business days of the initial electrical connection.</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 will ensure compliance most of the time, but I note that the process to request meter certification or meter replacement for reconnections was not followed as expected in one instance.</p> <p>The audit risk is low as the volume of ICPs affected was small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/21	

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: 28-May-21</p>	<p>Compass Communications does not include information on Utilities Disputes on its website or its invoices.</p> <p>Mainpower does not include information on Utilities Disputes on its website.</p> <p>Simply Energy does not include information on Utilities Disputes when responding to customer queries, but intends to resolve this.</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	The controls are rated as weak as there is not a consistent approach. The audit risk rating is low because all brands achieved partial compliance.		
Actions taken to resolve the issue		Completion date	Remedial action status
See Preventative Actions		N/a	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Information regarding Utilities Disputes will be added to the automated signature for any communication sent via Simply Energy email channels.</p> <p>The various Retail brands supplied by Simply Energy have all been provided the information they require to be compliant and Simply Energy will ensure this information is provided on their primary communication channels, website and invoices.</p>		30/6/2021	

Provision of information on electricity plan comparison site		
Non-compliance	Description	
<p>Audit Ref: 2.20</p> <p>With: Clause 11.30B</p> <p>From: 01-Apr-21</p> <p>To: 28-May-21</p>	<p>Compass Communications does not include information on Powerswitch on its website, its invoices, or in outbound communications regarding price changes or billing.</p> <p>Simply Energy does not include information on Powerswitch in outbound communications regarding pricing and service changes for customers with residential ANZSIC codes, but intends to resolve this.</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	The controls are rated as weak as there is not a consistent approach. The audit risk rating is low because all brands achieved partial compliance.	
Actions taken to resolve the issue		Completion date
See Preventative Actions		N/a
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Information regarding Powerswitch will be added to the automated signature for any communication sent via Simply Energy email channels.</p> <p>The various Retail brands we manage have all been provided the information they require to be compliant and Simply Energy will ensure this information is provided on their primary communication channels, website and invoices.</p>		30/6/2021
		Identified

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 12-Oct-20 To: 24-Feb-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> 46 late updates to inactive status. 18 late trader updates. 57 late ANZSIC code updates, at least three of which were not genuine and related to correction of other attributes. <p><i>SELS</i></p> <ul style="list-style-type: none"> Three late updates to active status for reconnections. Nine late updates to inactive status. 15 late trader updates. Ten late ANZSIC code update, at least three of which were not genuine and related to correction of other attributes. <p><i>SELX</i></p> <ul style="list-style-type: none"> Two late updates to active status for reconnections. Two late updates to inactive status. One late trader update. 18 late ANZSIC code updates, at least five of which were not genuine and related to correction of other attributes. <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, the processes are manual and as volume increases the risk of errors being made increases.</p> <p>The audit risk rating is assessed to be low as the overall volume of backdated events was small.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>	30/9/2021	
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Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 14-Jan-21</p> <p>To: 10-Mar-21</p>	<p><i>SIMP</i></p> <p>There was no active ICP for the point of connection at Kiosk 1, 180 Lambton Quay between 28/12/12 and 20/01/21.</p> <p><i>SELS</i></p> <p>The MEP nomination for 0000013601TC4D6 was not accepted within 14 business days of the event date.</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 currently rated as weak because regular monitoring of new connections and ICPs at new and ready status is not occurring.</p> <p>The impact of the late MEP nomination is low because the MEP nomination was accepted by the MEP.</p> <p>The impact of having no active ICP at Kiosk 1, 180 Lambton Quay between 28/12/12 and 20/01/21 is unknown.</p>	
Actions taken to resolve the issue		Completion date
<p>The ICP at Kiosk 1, 180 Lambton Quay was energised by the Network without Simply Energy being advised. Upon being advised that the site was energised and a client wanted to sign in, Simply Energy made the site Active and held this for one day before ICP switched to Nova.</p> <p>The increase of additional resource in the Operations Team should mitigate these timeliness issues in future.</p>		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		Identified

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 06-Aug-20 To: 03-Mar-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> 40 late updates for new connections. ICP 0000003106TCEFF has a status date of 03/09/20 but should have 01/09/20. ICP 0000034114EA3CE has a status date of 30/06/20 but should have 29/06/20. ICP 0000572059NR221 has a status date of 25/09/20 but should have 21/09/20. A further three ICPs had incorrect active dates and were corrected during the audit. <p><i>SELS</i></p> <ul style="list-style-type: none"> 27 late updates for new connections. Three ICPs had incorrect active dates and were corrected during the audit. <p><i>SELX</i></p> <ul style="list-style-type: none"> 18 late updates for new connections, which were switched to SELX and had the initial status update re-processed. <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, the processes are manual and as volume increases the risk of errors being made increases.</p> <p>The audit risk rating is low as the bulk of new connection updates are being made within five business days and the volume of incorrect active statuses/dates was small.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>	30/9/2021	
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ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k)) of Schedule 11.1</p> <p>From: 26-Jan-21</p> <p>To: 28-May-21</p>	<p><i>SIMP</i></p> <p>Two ICPs have incorrect ANZSIC codes assigned.</p> <p><i>SELS</i></p> <p>Three ICPs had incorrect ANZSIC codes assigned. One was corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong, because they are sufficient to ensure that most ANZSIC codes are recorded correctly.</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
All ICPs noted during the audit have now been resolved.		10/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
ANZSIC code will become a required field during ICP sign up and will become part of our customer conversations during RFP processes		31/1/2022

Management of “active” status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Apr-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> ICP 0000003106TCEFF has a status date of 03/09/20 but should have 01/09/20. ICP 0000034114EA3CE has a status date of 30/06/20 but should have 29/06/20. ICP 0000572059NR221 has a status date of 25/09/20 but should have 21/09/20. A further three ICPs had incorrect active dates and were corrected during the audit. There was no active ICP for the point of connection at Kiosk 1, 180 Lambton Quay between 28/12/12 and 20/01/21. <p><i>SELS</i></p> <ul style="list-style-type: none"> Six SELS ICPs have more than one active customer. Two ICPs had incorrect active dates and were corrected during the audit. ICP 0000013012KP27B (active from 01/10/20) was not updated effective from the correct status date. <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, the processes are manual and as volume increases the risk of errors being made increases. Regular monitoring of new connections and ICPs at new and ready status is not occurring.</p> <p>The audit risk rating is low as the volume of ICPs with incorrect active statuses/dates is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Following the audit a Project will be created to resolve all historical issues that are resolvable. This is related to the 4x ICPs with wrong statuses still.</p> <p>The ICPs with multiple customers will be reviewed and resolved if possible.</p>		30/11/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>	<p>30/9/2021</p>	
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Management of “inactive” status			
Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 02-Nov-20 To: 03-Mar-21</p>	<p><i>SIMP</i></p> <p>Six inactive status updates had incorrect status reason codes applied.</p> <p>Four inactive status updates had incorrect event dates applied.</p> <p><i>SELS</i></p> <p>One inactive status update had an incorrect event date applied.</p> <p><i>SELX</i></p> <p>One inactive status update had an incorrect event date applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate, the processes are manual and as volume increases the risk of errors being made increases.</p> <p>The audit risk rating is assessed to be low based on the small differences in event dates, and that the “status” code was correct although the “status reason” code was not.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following the audit a Project will be created to resolve all historical issues that are resolvable. This includes the ICPs with wrong statuses.		30/9/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021	

Inform registry of switch request for ICPs - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 2 of Schedule 11.3</p> <p>From: 14-Dec-20</p> <p>To: 05-Jan-21</p>	<p><i>SELS</i></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: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong, because 1/15 files checked was sent late, and the late update occurred during a period of reduced staffing over the Christmas to New Year period.</p> <p>The impact is low because the file was issued within one business day of the proposed event date.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		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: 12-Jun-20</p> <p>To: 06-Mar-21</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><i>SIMP</i></p> <ul style="list-style-type: none"> • Three transfer CS files contained incorrect last actual read dates. • Three transfer CS files contained event reads which did not reflect the actual or estimated reading on the last day of supply. • One transfer CS file contained an incorrect read type. • One transfer CS file contained a CSPREMISES row only. • Five transfer CS files contained incorrect average daily kWh. <p><i>SELS</i></p> <ul style="list-style-type: none"> • One transfer CS files contained an incorrect last actual read date. • Four transfer CS files contained event reads which did not reflect the actual or estimated reading on the last day of supply. • Four transfer CS files contained an incorrect read type. • One transfer CS files contained an incorrect average daily kWh. <p><i>SELX</i></p> <ul style="list-style-type: none"> • One T2 breach. • One transfer CS file contained an incorrect last actual read date. • Five transfer CS files contained event reads which did not reflect the actual or estimated reading on the last day of supply. • Five transfer CS files contained an incorrect read type. • Five transfer CS files contained incorrect average daily kWh. <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>The controls are assessed to be weak due to the number of exceptions found. Procedures are in place to determine the correct switch event read, read type, and last actual read date, but are not consistently and correctly followed by staff creating CS files.</p> <p>The impact is assessed to be medium based on the number of exceptions identified, although the actual impact of the exceptions is low.</p> <ul style="list-style-type: none"> • The difference between the applied and correct readings was small and in some cases the gaining trader issued an RR which was accepted. • There were only two genuinely late CS files across all switches conducted by Simply Energy. The files were four business days late. • The incorrect read types can impact on the gaining trader's ability to issue read renegotiations under Clause 6(2) and (3) Schedule 11.3.

Actions taken to resolve the issue	Completion date	Remedial action status
N/a - unable to "resolve" now that its switched	N/a	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of the switch request process is currently in development and will be deployed in the near future.	31/10/21	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 9 Schedule 11.3</p> <p>From: 07-Jul-20</p> <p>To: 20-Jan-21</p>	<p><i>SIMP</i></p> <p>Three RR files were not supported by at least two validated actual readings.</p> <p>ICP 0005107200WM4AB (event date 27/11/20) had an incorrect event read recorded in Datahub. 13142 was recorded instead of 13154.</p> <p>ICPs 0000772550TE557 (event date 07/07/20) and 1000002127BP4E4 (event date 20/01/21) did not have the agreed switch event readings recorded in MADRAS.</p> <p><i>SELS</i></p> <p>0000033275EA718 (event date 19/10/20) did not have the agreed switch event readings recorded in MADRAS.</p> <p><i>SELX</i></p> <p>0001270860PC7A5 (event date 07/08/20), 0000922534TUA6A (event date 04/11/20), 1000590726PC900 (event date 20/01/21), 0000906091TU572 (event date 24/02/21) and ICP 0001800470PC814 (event date 29/07/20) did not have the agreed switch event readings recorded in MADRAS.</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:</p> <ul style="list-style-type: none"> Simply Energy's policies are compliant but processes to ensure that RR requests are supported by two actual readings are not always followed. Missing start reads are not being promptly identified and resolved. <p>The impact is low because forward estimate will be created for reconciliation until the start readings are loaded, and then revised data will be provided through the wash up process.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Following the audit a Project will be created to resolve all historical issues, those that can be resolved will be.		30/09/2021
Preventative actions taken to ensure no further issues will occur		Completion date

<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>	<p>30/09/2021</p>	
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Non-half hour switch event meter reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.5</p> <p>With: Clause 6(2) and (3) Schedule 11.3</p> <p>From: 26-Jan-21</p> <p>To: 26-Jan-21</p>	<p><i>SIMP</i></p> <p>One RR issued under clause 6(2) and (3) Schedule 11.3 was rejected because an accompanying email was not sent, and was accepted on reissue.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because compliant processes are in place, and one exception was identified. The impact is low because the RR was accepted on reissue once correspondence was received.	
Actions taken to resolve the issue		Completion date
This issue was resolved upon acceptance of the reissue.		15/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		Identified

Gaining trader informs registry of switch request - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.7</p> <p>With: Clause 9 Schedule 11.3</p> <p>From: 26-Jun-20</p> <p>To: 01-Mar-21</p>	<p><i>SIMP</i></p> <p>Two NT files were issued more than two business days after pre-conditions were cleared.</p> <p><i>SELS</i></p> <p>One NT file was issued more than two business days after pre-conditions were cleared.</p> <p><i>SELX</i></p> <p>One NT file was issued more than two business days after pre-conditions were cleared.</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, because 4/15 files checked were sent late, and the late updates occurred throughout the audit period.</p> <p>The impact is low because the file was issued within ten business days of the proposed event date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
N/a - late responses, unable to "resolve"		N/a	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Automation of the switch request process is currently in development and will be deployed in the near future.		31/10/2021	

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 02-Nov-20</p> <p>To: 19-Nov-20</p>	<p><i>SIMP</i></p> <p>The AN for 0000144501KP26B (event date 14/11/20) had a proposed event date of 14/11/20, which was the day before the gaining trader's requested date.</p> <p>One T2 breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong and the impact as low. Processes are in place but were not correctly followed in two instances.</p> <p>The audit risk rating is low there were only two genuinely late CS files across all switches conducted by Simply Energy. The file was six business days late.</p>	
Actions taken to resolve the issue		Completion date
N/a - unable to "resolve" now that its switched		N/a
Preventative actions taken to ensure no further issues will occur		Completion date
Automation of the switch request process is currently in development and will be deployed in the near future.		31/10/2021

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: 12-Jun-20</p> <p>To: 06-Mar-21</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><i>SIMP</i></p> <ul style="list-style-type: none"> Seven switch move CS files contained incorrect last actual read dates. Four switch move CS files contained event reads which did not reflect the actual or estimated reading on the last day of supply. Three switch move CS files contained an incorrect read type. 12 switch move CS files contained a CSPREMISES row only. Six switch move CS files contained an incorrect average daily kWh. <p><i>SELS</i></p> <ul style="list-style-type: none"> Six switch move CS files contained incorrect last actual read dates. One switch move CS file contained event reads which did not reflect the actual or estimated readings on the last day of supply. Five switch move CS files contained an incorrect read type. Four switch move CS files contained an incorrect average daily kWh. <p><i>SELX</i></p> <ul style="list-style-type: none"> Three switch move CS files contained event reads which did not reflect the actual or estimated reading on the last day of supply. Three switch move CS files contained an incorrect read type. One switch move CS file contained an incorrect average daily kWh. <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are assessed to be weak due to the number of exceptions found. Procedures are in place to determine the correct switch event read, read type, and last actual read date, but are not consistently and correctly followed by staff creating CS files.</p> <p>The impact is assessed to be medium based on the number of exceptions identified, although the actual impact of the exceptions is low.</p> <ul style="list-style-type: none"> The difference between the applied and correct readings was small and in some cases the gaining trader issued an RR which was accepted. There were only two genuinely late CS files across all switches conducted by Simply Energy. The file was four business days late. 	
Actions taken to resolve the issue		Remedial action status
N/a - unable to "resolve" now that its switched		Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of the switch request process is currently in development and will be deployed in the near future.	31/10/2021	

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: 11-Dec-20</p> <p>To: 11-Feb-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> One RR breach. One RR was not supported by two validated actual readings. ICP 0000204747DE2DC (event date 10/01/21) did not have the agreed switch event readings recorded in MADRAS. ICP 0000002043SF788 (event date 30/09/20) did not have the agreed switch event readings recorded in Datahub or MADRAS. <p><i>SELS</i></p> <ul style="list-style-type: none"> One RR breach. Two RRs were not supported by two validated actual readings. ICP 0110117012AP421 (event date 01/10/20) does not have the correct event reading recorded in Datahub. The correct reading is recorded in MADRAS for settlement. ICP 0003727196WF6B8 (event date 01/12/20) does not have a start read recorded in Datahub or MADRAS because the reading failed validation. ICPs 0369229681LCC24 (event date 01/01/21), 0032300312DF387 (event date 27/01/21) did not have the agreed switch event readings recorded in MADRAS. ICP 1001127640LC366 (event date 11/12/20) is not recorded in MADRAS. <p><i>SELX</i></p> <ul style="list-style-type: none"> ICP 0001332060PCB11 (event date 23/01/21) did not have the agreed switch event readings recorded in MADRAS. <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak:</p> <ul style="list-style-type: none"> Simply Energy's policies are compliant but processes to ensure that RR requests are supported by two actual readings are not always followed. Missing start reads are not being promptly identified and resolved. <p>The impact is low because forward estimate will be created for reconciliation until the start readings are loaded, and then revised data will be provided through the wash up process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>Following the audit a Project will be created to resolve all historical issues that are resolvable.</p> <p>Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.</p>	30/9/2021	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p> <p>Automation of the switch request process is currently in development and will be deployed in the near future.</p>	31/10/2021	

Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.12</p> <p>With: Clause 14 Schedule 11.3</p> <p>From: 23-Jun-20</p> <p>To: 14-Dec-20</p>	<p><i>SIMP</i></p> <p>One late HH NT.</p> <p><i>SELS</i></p> <p>One late HH NT.</p> <p>Two PT breaches.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate, as the delays were caused by late initiation of the switches or the wrong trader code being selected in error.</p> <p>The impact is low because a small number of switches were affected.</p>	
Actions taken to resolve the issue		Completion date
N/a - late responses, unable to "resolve"		N/a
Preventative actions taken to ensure no further issues will occur		Completion date
Automation of the switch request process is currently in development and will be deployed in the near future.		31/10/2021
		Investigating

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: 02-Nov-20</p> <p>To: 02-Mar-21</p>	<p><i>SIMP</i></p> <p>One NA breach.</p> <p>One SR breach.</p> <p>Two incorrect NW withdrawal reason codes.</p> <p><i>SELS</i></p> <p>Four NA breaches.</p> <p>One SR breach.</p> <p>Three incorrect NW withdrawal reason codes.</p> <p><i>SELX</i></p> <p>Two NA breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong. Almost all NWs were delayed by investigation to confirm whether the NW was required, and most NW content was accurate.</p> <p>The impact is assessed to be low because a small proportion of NWs were issued late, or with incorrect codes.</p>	
Actions taken to resolve the issue		Completion date
<p>N/a - unable to retrospectively "resolve"</p> <p>Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.</p>		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p>		30/9/2021
		Identified

Metering information			
Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 03-Sep-20 To: 03-Mar-21</p>	<p><i>SIMP</i></p> <p>At least seven switch event readings did not reflect the actual or best estimate of the switch event reading.</p> <p><i>SELX</i></p> <p>At least eight switch event readings did not reflect the actual or best estimate of the switch event reading.</p> <p><i>SELS</i></p> <p>At least five switch event readings did not reflect the actual or best estimate of the switch event reading.</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 assessed to be weak due to the number of exceptions found. Procedures are in place to determine the correct switch event read and read type, but are not consistently and correctly followed by staff creating CS files.</p> <p>The impact is assessed to be low, the difference between the applied and correct readings was small and in some cases the gaining trader issued an RR which was accepted.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
N/a - unable to "resolve" now that its switched		N/a	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Automation of the switch request process is currently in development and will be deployed in the near future.		31/10/2021	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 14-Jan-21</p> <p>To: 10-Mar-21</p>	<p><i>SELS</i></p> <p>The MEP nomination for 0000013601TC4D6 was not accepted within 14 business days of the event date.</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 MEP nomination was delayed because the ICP was claimed late, primarily due to a decrease in monitoring of new connections from January 2021. The current controls are weak because regular monitoring of new connections is not occurring.</p> <p>The impact is low because the MEP nomination was accepted by the MEP.</p>	
Actions taken to resolve the issue		Completion date
<p>N/a - late responses, unable to "resolve"</p> <p>Following the Contact Energy audit two additional people with previous electricity industry knowledge have been employed. A further role has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.</p>		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p>		30/9/2021

Derivation of meter readings		
Non-compliance	Description	
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Jun-20</p> <p>To: 30-Apr-21</p>	<p>Meter condition information is not routinely reviewed to identify issues with seals, tampering, phase failure or safety.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak because they are unlikely to mitigate risk most of the time.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
See preventative actions		N/a
Preventative actions taken to ensure no further issues will occur		Completion date
<p>WELLS currently provide Simply Energy with Meter Condition details in a standardised format.</p> <p>Simply Energy will introduce reporting (and supporting automated data exchange processes) into our core operational workflow to identify ICPs on SIMP/SELS/SELX where the Meter Condition is flagged as an issue and requires investigation.</p> <p>Additionally, a workflow will be created to run analysis of volumes consumed on any ICPs before and after any event identified.</p>		31/12/2021
		Investigating

NHH meter reading application			
Non-compliance	Description		
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Jun-20</p> <p>To: 07-Mar-21</p>	<p><i>SIMP</i></p> <p>12 ICPs with incorrect application of readings.</p> <p><i>SELS</i></p> <p>Ten ICPs with incorrect application of readings.</p> <p><i>SELX</i></p> <p>14 ICPs with incorrect application of readings.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak because they are not sufficient to ensure discrepancies are identified and corrected.</p> <p>The impact is assessed to be medium due to the high number of discrepancies identified from the sample, and the impact on settlement and other participants.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.		30/9/2021	
Automation of the switch request process is currently in development and will be deployed in the near future.		31/10/2021	

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-Jun-20</p> <p>To: 07-Mar-21</p>	<p><i>SIMP</i></p> <p>For four ICPs unread during the period of supply, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p><i>SELX</i></p> <p>For one ICP 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: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. There is a process in place, but compliance is not consistently achieved if the period of supply is short, or actual reads fail validation because they are lower than previous estimates.</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
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		Identified

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>Froom: 01-Jun-20</p> <p>To: 07-Mar-21</p>	<p><i>SIMP</i></p> <p>For at least ten ICPs unread in the previous 12 months, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p><i>SELX</i></p> <p>For at least two ICPs unread in the previous 12 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	
Low	<p>The controls are assessed to be moderate. It appears the normal process is not always followed due to resourcing constraints.</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 100% read attainment, and overall read attainment is high.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		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-Nov-20</p> <p>To: 30-Nov-20</p>	<p><i>SIMP</i></p> <p>For at least two ICPs unread in the previous four months, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p><i>SELS</i></p> <p>For at least one ICP unread in the previous four months, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p><i>SELX</i></p> <p>For at least two 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: 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 assessed to be moderate. There is a process in place, but compliance is not consistently achieved 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
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		Identified

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3)</p> <p>Schedule 15.2</p> <p>From: 03-Sep-20</p> <p>To: 03-Mar-21</p>	<p><i>SIMP</i></p> <p>At least four switch event readings were incorrectly classified as actual.</p> <p><i>SELX</i></p> <p>At least eight switch event readings were incorrectly classified as actual.</p> <p><i>SELS</i></p> <p>At least five switch event readings were incorrectly classified as actual.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are assessed to be weak because they do not reduce risk to an acceptable level.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> the difference between the applied and correct readings is low in most cases, and the incorrect read types can impact on the gaining trader's ability to issue read renegotiations under Clause 6(2) and (3) Schedule 11.3. 	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		Identified

Half hour estimates			
Non-compliance	Description		
<p>Audit Ref: 9.4</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>om: 01-Jun-20</p> <p>To: 07-Mar-21</p>	<p><i>SELS</i></p> <p>HHR estimated data is not replaced with actual data if the actual trading period volumes are lower than the estimated volumes.</p> <p>Inaccurate estimations where the time periods used as a basis for estimations contains stat holidays.</p> <p>Estimates not replaced with actuals if the replacement file does not contain a register read.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as weak because they do not ensure the accuracy of estimates and don't ensure estimates are replaced with actuals.</p> <p>The audit risk rating is high because one estimate was inaccurate by 1,384,052 kWh and 1,514 ICPs still contain estimates, and many will have actual data available.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
1) We were unable to find this issue occurring after the last audit, now we have a concrete example we will analyse the reason for the failure and make all necessary adjustments to the data and the upload/validation process		31/10/2021	Investigating
2) Simply Energy estimation logic will be updated to meet code requirements		31/7/2021	
3) Where we can identify actuals that can be uploaded to replace estimates we will do so - NB: This requires a system change noted in the preventative actions.		31/12/2021	
Preventative actions taken to ensure no further issues will occur		Completion date	

1) The Upload/Validation process will be updated to ensure all actual readings are imported	31/10/2021	
2) The system estimate logic will be reviewed and updated to reflect a more appropriate methodology.	31/7/2021	
3) Our system is currently rejecting data files for AMI connections that have HHR data supplied but no midnight read (register reads). We will adjust this workflow so these files are accepted.	31/12/2021	

Electronic meter readings and estimated readings			
Non-compliance	Description		
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Jun-20 To: 07-Mar-21	<i>SIMP, SELS, SELX</i> AMI event logs are not routinely reviewed. Potential impact: Low Actual impact: Low 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 they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Focus is on preventative actions		N/a	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Simply Energy will look to enhance our Third Party Platform (Datahub) to import AMI Event Logs into each Datastream. Reporting will then be created based on the requirements and validation flags can be added for ICP specific information.		31/1/2022	

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: 07-Mar-21</p>	<p><i>SIMP, SELS and SELX</i></p> <p>Some ICP days were not reported correctly for some NSPs.</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. Processes are in place to identify start and end date discrepancies, but their manual nature, workloads and other priorities resulted in them not being completed and errors not being detected prior to submission.</p> <p>The impact is assessed to be low because corrected data will be washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following the audit a Project will be created to resolve all historical issues of this nature.		30/6/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Additional resourcing has been allocated to the Submission process as part of the creation of 3 new roles into the Operations team since the inception of the Contact Audit.</p> <p>Additionally, new technology has been developed to support the identification of issues in a more timely manner, including management of all time periods for revision submissions at one time.</p>		31/7/2021	

Electricity supplied information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7</p> <p>From: 01-Jun-20</p> <p>To: 07-Mar-21</p>	<p><i>SELS</i></p> <p>Incorrect electricity supplied information from March to June 2020.</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. The files are generated from AXOS, and there are monitoring controls in place.</p> <p>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.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This Issue will not be resolved,</p> <p>For context: our understanding is that the submissions are accurate, the billing was accurate, however our ability to provide accurate reporting to Veritek for validation of this is not. The issue was caused by someone with system administrator rights deleting the billing data within the system. We have decided not to try to replicate this data through manual uploads from our back-ups given the wider risks that we identified.</p>		N/a	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>System administrator access has been reviewed and removed from all but a select few users.</p>		31/7/2021	

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Jun-20</p> <p>To: 07-Mar-21</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p><i>SIMP and SELS</i></p> <p>Some HHR aggregates errors due to late processing of events, late data or issues not identified during validation.</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 issue relating to content of the aggregates file is an error in the code, Simply Energy is providing submission information as expected.</p> <p>The controls are rated as moderate overall. Processes are in place to validate submission data, but their manual nature, workloads and other priorities resulted in them not being completed and errors not being detected prior to submission.</p> <p>The impact is low based on the volume differences identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We believe that the code is written in such a way that it is not possible to be compliant. This has been noted previously and if we change our processes there will be more material non-compliances caused.</p> <p>Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.</p>		<p>N/a</p> <p>30/6/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We would like to see the EA refine the wording of this particular clause to allow compliance.</p> <p>Additional resourcing has been allocated to the Submission process as part of the creation of 3 new roles into the Operations team since the inception of the Contact Audit.</p> <p>New technology has been developed to support the identification of issues in a timelier manner, including management of all time periods for revision submissions at one time.</p>		<p>?</p> <p>31/7/2021</p>	

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: 07-Mar-21</p>	<p><i>SIMP</i></p> <p>Unmetered submission did not occur for February 2021 for ICP 0000514131NR159.</p> <p>Incorrect submission for HHR ICPs 0000009033NT7F6 and 0000033374NT4F6.</p> <p>There was no active ICP for the point of connection at Kiosk 1, 180 Lambton Quay between 28/12/20 and 20/01/21. No submission occurred during this period.</p> <p><i>SELS</i></p> <p>ICP 0000024997EA2A8 did not have submission information for February 2021.</p> <p>Late HHR vols file for September 2020.</p> <p>75 ICPs missing from submission for December 2020.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as moderate. Processes to ensure submissions are complete and accurate are in place, but their manual nature, workloads and other priorities resulted in them not being completed and errors not being detected prior to submission.</p> <p>The impact is high based on the incorrect submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
HHR ICPs 0000009033NT7F6 and 0000033374NT4F6 have been resolved in June 2021 for the R14, R7 and R3 reconciliation washups.		30/6/2021	Identified
The ICP at Kiosk 1, 180 Lambton Quay was energised by the Network without Simply Energy being advised. Upon being advised that the site was energised and a client wanted to sign in, Simply made the site Active and held this for one day before ICP switched to Nova.		N/a	
Both ICP 0000514131NR159 and 0000024997EA2A8 will be raised in the Project following Audit Report provision to be resolved.		30/9/2021	
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Additional resourcing has been allocated to the Submission process as part of the creation of 3 new roles into the Operations team since the inception of the Contact Audit.</p> <p>Additionally new technology has been developed to support the identification of issues in a more timely manner, including management of all time periods for revision submissions at one time.</p>	<p>30/6/2021</p>	
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Allocation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.3</p> <p>With: Clause 15.5</p> <p>From: 01-Jul-19</p> <p>To: 31-Aug-20</p>	<p><i>SIMP</i> CSC0012 3,720 kWh was not zeroed for July 2019 R7.</p> <p><i>SELX</i> KMO0331, 216 kWh was not zeroed for July 2019 R14. MTN0331, 23 kWh was not zeroed for July 2020 R3, 253 kWh was not zeroed for August 2020 R3.</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 because there is no zeroing process for the AV080, only the AV110.</p> <p>The impact is low based on the kWh over submitted.</p>	
Actions taken to resolve the issue		Completion date
Following the audit a Project will be created to resolve all historical issues of this nature.		30/9/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Additional resourcing has been allocated to the Submission process as part of the creation of 3 new roles into the Operations team since the inception of the Contact Audit.</p> <p>Additionally, new technology has been developed to support the identification of issues in a more timely manner, including management of all time periods for revision submissions at one time.</p>		30/6/2021
		Identified

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: 07-Mar-21</p>	<p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>September 2020 HHR vols file for SELS sent late.</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: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as moderate:</p> <ul style="list-style-type: none"> • historic and forward estimate is correctly identified most of the time, and • submission validation processes are in place, but their manual nature, workloads and other priorities resulted in them not being completed and errors not being detected prior to submission. <p>The impact is assessed to be high based on the impact on submission accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Additional resourcing has been allocated to the Submission process as part of the creation of 3 new roles into the Operations team since the inception of the Contact Audit.</p> <p>Additionally, new technology has been developed to support the identification of issues in a more timely manner, including management of all time periods for revision submissions at one time.</p>		30/6/2021	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: Clause 4 Schedule 15.2</p> <p>From: 01-Jul-19</p> <p>To: 30-Sep-19</p>	<p><i>SIMP and SELX</i></p> <p>Some estimates are not replaced at R14.</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 considered moderate because:</p> <ul style="list-style-type: none"> meter reading read attainment is high, most of the forward estimate checked was historic estimate, which was mislabelled as forward estimate because shape files were unavailable for the ICP's profile, and there is a permanent estimate process in place, but permanent estimates are not routinely entered prior to r14. <p>The impact of the non-compliance is dependent on the accuracy of the estimates applied. Where the SFI profile is used for SELX, the shape files are not used, therefore the consumption for each month will be incorrect.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021

Historical estimates and forward estimates			
Non-compliance	Description		
Audit Ref: 12.10 With: Clause 3 Schedule 15.3 From: 01-Jun-20 To: 07-Mar-21	Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because historic and forward estimate is correctly identified most of the time. There is a medium impact on settlement because shape files are not used for the SFI and SBL profiles.		
Actions taken to resolve the issue		Completion date	Remedial action status
Unfortunately we 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).		N/a	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Simply Energy plans to move NHH Data Admin to Datahub, this will allow Simply Energy the ability to adjust the system to allow for compliance.		31/1/2022	

Forward estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: 01-Jun-20 To: 07-Mar-21</p>	<p><i>SIMP and SELX</i></p> <p>The accuracy threshold was not met for some revisions.</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	
Low	<p>Controls are rated as moderate. They are sufficient to ensure data is within the accuracy threshold most of the time, but do not always provide a realistic estimate of consumption because a default daily forward estimate is applied.</p> <p>The impact is low, revised data is washed up.</p>	
Actions taken to resolve the issue		Completion date
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021
		Identified

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-20</p> <p>To: 07-Mar-21</p>	<p><i>SIMP, SELX and SELS</i></p> <p>Historic estimate targets were not met for all months and revisions.</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 considered moderate because:</p> <ul style="list-style-type: none"> meter reading read attainment is high, and most of the forward estimate checked was historic estimate, which was mislabelled as forward estimate because shape files were unavailable for the ICP's profile. <p>The impact of the non-compliance is dependent on the accuracy of the estimates applied. There are sound estimation processes, therefore I have recorded the audit risk rating as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following the Contact Energy audit two experienced additional people have been employed into newly created roles. A third new role supporting our Operations team has been created which is due to be filled in the coming month. This will add urgent focus to the Operations key processes.		30/6/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Along with additional experienced staff being added to the team, a project focussed on the Operations team which will include refresher and regular training has been created to improve the overall compliance.</p> <p>This project will also review all existing controls, responsibility and accountability of such and the addition of new / improved controls added to the project roadmap where/if required. Reporting and communication of these controls and their status will be fed into the existing forums with an additional report to the Leadership Team.</p>		30/9/2021	