

Compliance plan for Bosco 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-May-18</p> <p>To: 31-Mar-19</p>	<p>Some corrections not conducted as soon as practicable.</p> <p>Correction for ICP 0167074458LC2DC incorrectly processed resulting in under submission of 153 kWh.</p> <p>Corrections from the two previous audits not carried out resulting in under submission of 6,791 kWh from the 2018 audit and 2,605 kWh from the 2019 audit.</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>The controls overall are rated as moderate but are weak in relation to the processing of corrections.</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>We have implemented some system changes where users are now required to enter a reconnection date. The registry status will be updated to reflect this date and will not require manual correction for backdated events.</p> <p>ICP 0167074458LC2DC has been corrected and will be reflected through washup submissions.</p>		May 2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We have implemented some system changes where users are now required to enter a reconnection date. The registry status will be updated to reflect this date and will not require manual correction for backdated events.</p> <p>Process to be reviewed to determine why the ICPs with consumption while inactive were not picked up through BAU processing.</p>		<p>May 2020</p> <p>Sep 2020</p>
		Identified

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 of schedule 11.1</p> <p>From: 01-Feb-19</p> <p>To: 31-Dec-19</p>	<p>Registry not updated within 5 business days of the event.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as controls will mitigate risk most of the time, but there is room for errors to occur.</p> <p>The audit risk rating is low as the number of ICPs affected is small.</p>	
Actions taken to resolve the issue		Completion date
<p>The registry update process has been changed to send status updates every 2 day instead five days.</p> <p>We have implemented some system changes where users are now required to enter a reconnection date. The registry status will be updated to reflect this date.</p> <p>The status for 0000591590TE5FD has now been corrected.</p>		May 2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The registry update process has been changed to send status updates every 2 day instead five days.</p> <p>We have implemented some system changes where users are now required to enter a reconnection date. The registry status will be updated to reflect this date.</p>		May 2020
		Identified

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 01-Feb-19</p> <p>To: 26-Mar-20</p>	<p>At least four ICPs had incorrect ANZSIC codes assigned.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as they are sufficient to ensure that most ANZSIC codes are recorded correctly.</p> <p>The impact is low. Most ANZSIC codes were found to be correct and there is no impact on settlement.</p>	
Actions taken to resolve the issue		Completion date
Three of the Four ICPs have been corrected. The remaining one is under investigation as customer classification is different to street view.		July 2020
Preventative actions taken to ensure no further issues will occur		Completion date
We believe our current process is working well to keep errors to a minimum.		N/A
		Identified

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Feb-19</p> <p>To: 31-Dec-19</p>	<p>Incorrect “inactive” status for 20 ICPs.</p> <p>Potential impact: Medium</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 recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The statuses have been corrected for all 20 ICPs.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Process to be reviewed to determine why the ICPs with consumption while inactive were not picked up through BAU processing.		Sept 2020
		Identified

Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 of schedule 11.3</p> <p>From: 01-Feb-19</p> <p>To: 31-Dec-19</p>	<p>One incorrect average daily consumption.</p> <p>Readings from “smart reads” tab not used as switch event meter readings.</p> <p>One ICP had an actual read recorded as an estimate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>One incorrect average daily consumption. We are looking into what caused the incorrect daily consumption to ensure this does not happen again.</p> <p>Readings from “smart reads” tab not used as switch event meter readings. Switch Analysts now use the read available in the smart read tab.</p> <p>One ICP had an actual read recorded as an estimate. This was caused by a system error which we are looking into.</p>		<p>Dec 2020</p> <p>Completed</p> <p>Dec 2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Switch Analysts now use the read available in the smart read tab.</p> <p>We are working on a fix to ensure switch reads have the correct read type recorded.</p>		<p>Completed</p> <p>Dec 2020</p>
		Identified

Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 of schedule 11.3</p> <p>From: 01-Feb-19</p> <p>To: 31-Dec-19</p>	<p>Some incorrect CS file content.</p> <p>29 late switch move CS files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Some incorrect CS file content.</p> <p>We are looking into what caused the incorrect daily consumption to ensure this does not happen again. Switch Analysts now use the reads available in the smart read tab.</p> <p>We are working on a system fix to ensure switch reads have the correct read type recorded.</p>		Dec 2020	Identified
<p>29 late switch move CS files.</p> <p>The switch breach report was reviewed in July19 and since this time, there has been only 1 late file.</p>		Jul19	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Some incorrect CS file content.</p> <p>We are looking into what caused the incorrect daily consumption to ensure this does not happen again. Switch Analysts now use the reads available in the smart read tab.</p> <p>We are working on a system fix to ensure switch reads have the correct read type recorded.</p>		Dec 2020	
<p>29 late switch move CS files.</p> <p>The new process to manage CS timeliness has been reviewed and has proven successful with only 1 late file since implementation.</p>		Jul19	

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>From: 01-Feb-19</p> <p>To: 31-Dec-19</p>	<p>Two RRs without confirmation of how the reads were calculated.</p> <p>One RR file was rejected and should not have been.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate, because Bosco is aware of the requirement for RRs to be supported by at least two validated readings.</p> <p>The impact is assessed to be low, because a small number of ICPs are affected and there is only a minor impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
These have occurred due to human error. We have since reviewed our processes and have provided further training to staff.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
These have occurred due to human error. We have since reviewed our processes and have provided further training to staff.		Completed	

Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 & 18 of schedule 11.3</p> <p>From: 01-Feb-19</p> <p>To: 31-Dec-19</p>	<p>One switch withdrawal sent later than two months of the event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as strong because they mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as the volume of backdated switch withdrawals is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This late switch withdrawal was for “Wrong Premise” and was necessary for correct customer billing. Full compliance is difficult to achieve when dealing with wrong premises as these are often not identified within 2 months of the switch and also require investigation.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue with our strong controls for switch withdrawals.		N/A	

Metering information			
Non-compliance	Description		
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 01-Feb-19 To: 31-Dec-19	Some incorrect CS file switch event readings. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as weak as they are not sufficient to ensure that all CS content is consistently correct. The impact is assessed to be low, a small number of CS files with incorrect readings were identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Switch Analysts now use the reads available in the smart read tab to ensure for the most accurate switch reading.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switch Analysts now use the reads available in the smart read tab to ensure for the most accurate switch reading.		Complete	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 01-Feb-19 To: 31-Dec-19	For three CS files issued by Bosco, switch event reads did not reflect the actual reading or best estimate of an actual reading on the event date. Potential impact: Low Actual impact: Low Audit history: None 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
Switch Analysts now use the reads available in the smart read tab to ensure for the most accurate switch reading.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Switch Analysts now use the reads available in the smart read tab to ensure for the most accurate switch reading.		Complete
		Identified

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Mar-19</p> <p>To: 31-Dec-19</p>	<p>Best endeavours not demonstrated for 38 ICPs with a short period of supply.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate, because they are sufficient to ensure that the majority of ICPs will receive at least one actual read during the period of supply.</p> <p>The impact is assessed as low because four and 12 month read attainment rates are high.</p>	
Actions taken to resolve the issue		Completion date
We note that read attainment can be very difficult when period of supply is short. We will look at reducing our 4 months no read reporting, to 3 months to pick up more ICPs that may have a short supply period.		Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
We note that read attainment can be very difficult when period of supply is short. We will look at reducing our 4 months no read reporting, to 3 months to pick up more ICPs that may have a short supply period.		Dec 2020
		Identified

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Feb-19 To: 31-Dec-19	5 ICPs not read and exceptional circumstances were not present. Potential impact: Low Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is low as this affects only five ICPs of which only three have an active status.	
Actions taken to resolve the issue		Completion date
Further training and comms will be provided to our contact centre staff to be used when contacting 'No reads' customers to ensure best endeavours are met.		Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Further training and comms will be provided to our contact centre staff to be used when contacting 'No reads' customers to ensure best endeavours are met.		Dec 2020
		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-Mar-19</p> <p>To: 31-Dec-19</p>	<p>The best endeavours requirement was not met for three ICPs unread for four months.</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, because they are sufficient to ensure that most ICPs supplied for four months will receive at least one actual read.</p> <p>The risk is rated as low, a small number of ICPs were affected, and overall read attainment rates are high with close to 100% of ICPs read every four months.</p>	
Actions taken to resolve the issue		Completion date
Further training and comms will be provided to our contact centre staff to be used when contacting 'No reads' customers to ensure best endeavours are met.		Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Further training and comms will be provided to our contact centre staff to be used when contacting 'No reads' customers to ensure best endeavours are met.		Dec 2020
		Identified

Identification of readings			
Non-compliance	Description		
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 01-Mar-19 To: 31-Dec-19	Two readings incorrectly labelled. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are 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
This is caused by a system error. We are working on a fix to ensure switch reads have the correct read type recorded.		Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are working on a system fix to ensure switch reads have the correct read type recorded.		Dec 2020	

Meter data used to derive volume information		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Feb-19 To: 31-Dec-19	Raw meter data is rounded upon receipt and not when volume information is created. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There are no controls to prevent rounding of raw meter data, the system is designed to round as soon as the data arrives. There is very little impact because no metered consumption information is “missing”, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The breach risk rating & controls seem extreme considering there is virtually no impact on the market and up until now we have been deemed compliant in this area. We will investigate how we can become compliant in this area though it may not be feasible as significant system changes will be required.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We will investigate how we can become compliant in this area though it may not be feasible.		Ongoing
		Investigating

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: April 2019</p> <p>To: March 2020</p>	<p>HHR aggregates file does not contain electricity supplied information.</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>	
Actions taken to resolve the issue	Completion date	
Low	The issue relating to content of the aggregates file is an error in the code, Bosco is providing submission information as expected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Non-compliance disputed. Bosco is handling and presenting data as required by the Reconciliation Manager file specification.	N/A	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
This is an industry known issue which EA is aware off. Bosco will continue to prepare the aggregates file as required by the Reconciliation Manager file Specification.	N/A	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-Apr-19</p> <p>To: 31-Dec-19</p>	<p>One ICP with consumption while inactive did not have status corrections processed and submission did not occur.</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 overall, as they are sufficient to ensure that most data is correctly reported.</p> <p>The audit risk rating is assessed to be low as the points of connection missing from submission for the inactive period are small in number.</p>	
Actions taken to resolve the issue		Completion date
ICP status has since been corrected and will be reflected in washup submissions.		May 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Process to be reviewed to determine why the ICPs with consumption while inactive were not picked up through BAU processing.		Sept 2020
		Identified

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-May-18</p> <p>To: 31-Dec-19</p>	<p>Submission occurred for one HHR ICP after it switched away.</p> <p>16 corrections for consumption while inactive not carried out as BAU.</p> <p>Correction for ICP 0167074458LC2DC incorrectly processed resulting in under submission of 153 kWh</p> <p>Corrections from the two previous audits not carried out resulting in under submission of 6,791 kWh from the 2018 audit and 2,605 kWh from the 2019 audit.</p> <p>Potential impact: Medium</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 overall are rated as moderate but are weak in relation to the processing of corrections.</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>Submission occurred for one HHR ICP after it switched away: The ICP in question was switched to MEEN from EZYN 1/11/2019, this information was not passed on to EMS as they carry out the submission on behalf of EZYN. Mercury noticed it showing up in our ICPMISS reporting and informed EMS to get them to remove the offending ICP from their submission.</p> <p>16 corrections for consumption while inactive not carried out as BAU. ICP statuses have since been corrected and will be reflected in washup submissions.</p> <p>Correction for ICP 0167074458LC2DC incorrectly processed resulting in under submission of 153 kWh This has since been corrected and will be reflected in washup submissions.</p>		<p>Jan 2020</p> <p>Feb 2020</p> <p>May 2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date

<p>EZYN has only one HHR ICP which is submitted by EMS. We have changed our process to notify EMS as soon as a switch takes place.</p> <p>Process to be reviewed to determine why the ICPs with consumption while inactive were not picked up through BAU processing.</p>	Feb 2020	
	Sep 2020	

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: Sep-18 r14</p>	<p>Four forward estimates were not replaced by revision 14 for September 2018.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong as the reporting has since been modified to capture all ICPs with FE remaining.</p> <p>The impact is low. Total forward estimate for the three months reviewed was 980 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We will investigate why these were missed to ensure this issue does not occur again.		Sep 20	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We will investigate why these were missed to ensure this issue does not occur again.		Sep 20	