

# Compliance plan for Body Corporate Power 2020

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Incorrect information in 3 CS files and incorrect status for 50 ICPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they require some improvement. There was minor impact on settlement. Audit risk rating low		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>FCLM provides daily read files these files are dated next day to reading. Adjust reading date to previous day. All readings were correct.</p> <p>At the time of the Audit BCPL used the status installation in progress as there were two Traders at an ICP and submetering in place. BCPL was in the process of updating ICPs to reflect the correct energisation date. We considered this as the correct status as at the time audit for the 50 ICPs at Crest. Post Audit Vector backdated ICP in Registry to 1/08/2019. We have now updated status to Active (Energised). (See note Crest in summary).</p>		1 <sup>st</sup> April	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Regarding the three CS files. The Switching document has been updated to reflect the Date on Files from FCLM (one day after) reading.</p> <p>Regarding the 50 ICPs, we will introduce a process to audit a meter installation and check that it is configured correctly. This will include checking with the Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document.</p>		1 <sup>st</sup> April	

<p>Audit Ref: 2.2</p> <p>With: 15.35</p> <p>From: 01-Aug-19</p> <p>To: 29-Feb-20</p>	<p>No volumes submitted for 50 ICPs since 1/8/2019.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Medium</b>	The controls are rated as weak as volume were not submitted to the RM. BCPL was aware that meters were recording values. Audit risk rating medium.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
All Volumes will be submitted from Energisation date adjusted to 1 <sup>st</sup> August 2019		1 <sup>st</sup> April 2020	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document. (as identified in 2.1 above)		1 <sup>st</sup> April 2020	

Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 01-Aug-19</p> <p>To: 29-Feb-20</p>	<p>50 ICPs were electrically connected with no certified metering installation in place</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak. BCPL was aware that meters were recording volumes. Audit risk rating medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Meters were originally installed by Vircom as sub-meters during standard process with Vircom installations. Meters were then re-labelled and re-certified as revenue metering.</p> <p>Network Energisation date and MEP records updated in Registry</p> <p>Submitting all volume from energised ICPs from 1<sup>st</sup> August 2019</p>		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document. (as identified in 2.1 above)		1 <sup>st</sup> April 2020	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Backdated trader and status events in the registry</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	The controls are rated as moderate as they require some improvement. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
We have added monitoring and peer review to the Switching process which is when most updates take place. Additional Checks now in place for metering setup, CS file submission ICP status and profile.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have updated process documents and added one new process document. New processes are in place for meter installations in multi dwellings. Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties. New Process Document. (as identified in 2.1 above)		1 <sup>st</sup> April 2020	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 9 of Schedule 11.1</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Incorrect profile recorded for 4 ICPs</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	The controls are rated as moderate as they require some improvement. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
Internal process corrected, Profile PV1 was applied incorrectly to sites with EG (Solar) based on Network Certification). The Profile PV1 Should only be applied to import-export capable metering.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Correction on all 4 ICPs to RPS Profile and wait for meter upgrade to after installation of HHR or Import-Export Metering. We have amended our installation process for properties with new solar installations.		1 <sup>st</sup> April 2020	

Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: 19 of Schedule 11.1</p> <p>From: 01-Aug-19</p> <p>To: 29-Feb-20</p>	<p>"Inactive-new connection in progress" is assigned in correctly to 50 ICPs located in the Crest</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as none. BCPL was aware that meters were recoding volumes but no volumes were submitted. Audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Checks now in place for metering setup, ICP status and profile. Updated process documents and one new process document. At date of Audit there are two traders at 1 ICP. BCPL believes that it had used the correct status "Installation in Progress" in this scenario. Corrective action has been taken by BCPL to update registry and back date energisation date to 1 <sup>st</sup> August 2019. Status will be changed in Registry to "active" from that date and all volumes will be submitted from that date.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The Correct Status must apply to each ICP as per Status at that time. ICP Status will be backdated by Network to 1<sup>st</sup> August and Active Status applied from 1<sup>st</sup> August 2019 with all volumes submitted for all ICPs from that date.</p> <p>As above a new process in place for meter installations in multi dwellings. Meter Installation Configuration check with Network, MEP and Electrical Contractor for all BTS to Permanent Installations in multi-dwelling properties (as identified in 2.1 above). In this instance the Network was assumed to be a Customer Network with Nova Energy as Tier 1 Trader at Gate meter with BCPL trading as Tier Two.</p>		7 <sup>th</sup> April 2020	

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Incorrect last Read date in CS file for one ICP</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	The controls are rated strong. Switch event read was correct. No impact on settlement outcome. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
FLCM Submission files were labelled with the date following submission date. This was a simple human error. We now know that the date on the Submission files relate to the previous day.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Update process document "Switching Process"		1 <sup>st</sup> April 2020	



Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: 10(1) of Schedule 11.3</p> <p>From: 26-Nov-19</p> <p>To: 27-Nov-19</p>	<p>AN files not sent for all NTMI (3 ICPs)</p> <p>Potential impact: None</p> <p>Actual impact: None</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	The controls are rated as moderate as they require some improvement. Incorrect process. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching process document was correct, this was an oversight from BCPL. Switching process to be monitored and pair reviewed by J Candy.		Immediate and ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Peer review and monitoring of Switching Process, familiarisation of existing systems and processes		ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 11 of Schedule 11.3</p> <p>From: 26-Nov-19</p> <p>To: 27-Nov-19</p>	<p>Incorrect Last Read date in CS file for 3 ICPs</p> <p>Potential impact: None</p> <p>Actual impact: None</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 they require some improvement. Incorrect process. No impact on settlement outcomes because switch event reads were correct.. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
FLCM Submission files were labelled with the date following submission date. This was a simple human error. We now know that the date on the Submission files relate to the previous day.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Update process document "Switching Process"		1 <sup>st</sup> April 2020	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Mar-19 To: 29-Feb-20	HHRAGGR files do not contain electricity supplied information Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Body Corporate Power submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an industry wide problem which we are aware of. Our submissions are via our Agent, we will monitor industry workflows and responses form EA		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Update RM file Specification to Align with EA Code Requirement		ongoing	

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Historical estimates target not met for revision 3 for Aug'19 (WRD0331) and Nov'19 (ALB0331)</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	Controls are recorded as strong. There is a solid, robust process to monitor data and create reconciliation files. Audit rating is assigned as low because historical estimates column in NHHVOLS is not used for reconciliation purposes.		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL trades a very limited number of ICPs. If meter cannot be read due to location (not accessible by WELLS) then we may need to seek customer reads to avoid estimates.		1 <sup>st</sup> April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitor Read Files and seek Customer or Retailer Reads to avoid historical estimate targets.		1 <sup>st</sup> April 2020	