

Compliance plan for Contact Energy Reconciliation Participant – 2020

Participants to give access		
Non-compliance	Description	
Audit Ref: 1.11 With: Clause 16A.4 From: 01-May-20 To: 15-Jul-20	CTCS and CTCX Information not provided within 15 business days of the request. 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 rated as moderate as most information was generally provided as requested but it there is a resource constraint at Simply hence overall control rating. The audit risk rating is low as the information was eventually provided but this impacted analysis time.	
Actions taken to resolve the issue		Completion date
There is no current action to this issue as it has already passed.		01/09/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Process documentation has been updated to clearly show the business days required to provide information in future audits.		01/09/2020
Remedial action status		
Identified		

Relevant information	
Non-compliance	Description
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 03-Jun-19	CTCT, CTCS and CTCX Some inaccurate data is recorded and was not updated as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak

To: 22-Jul-20	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak. Controls are moderate for the CTCT operation. Validation processes are in place for CTCS and CTCX, but their manual nature and increased workloads resulted in some errors not being detected and resolved as soon as practicable.</p> <p>The audit risk rating is low, because the impact on submission information will wash out through the revision process, and the impact on other participants is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>Active date variance with Initial Electrical Connection Date</u></p> <p>Contact has made process changes and revamped its reporting to identify any discrepancies. We have made system logic changes to pick up the variances much earlier in the process.</p> <p>We continuously work with Distributors, MEPs and our field contractors to resolve date variance between Active status event, IED, and certification dates.</p> <p>Active ICPs with ANZSIC “T994”</p> <p>Contact has robust reporting in place to identify any ‘T9’ series ANZSIC codes applied in the registry and corrections are made via a manual correction process on regular basis.</p> <p>The one ICP with ‘T9’ ANZSIC code identified was gained incorrectly from alternate retailer. ICP has been vacant since our gain date and recently corrected to vacant-disconnected. As Contact has no customer to confirm end use of the property, ANZSIC code is correct as ‘unknown’.</p> <p>UNM non-compliances</p> <p>Contact has made steady improvements in UNM monitoring since the last audit. We are actively working with our customers and distributors to determine current UNM load details to resolve these non-compliances and expect this piece of work to be completed by November 2020. Contact will ensure any future non-compliances will be actioned as part of our monthly reconciliation process.</p> <p>Incorrect generation profiles recorded on the Registry</p> <p>Contact has robust reporting in place to pick up any discrepancies. Ten ICPs were found to have incorrect profiles recorded in the Registry. All ICPs were corrected except ICP 0004301000CA520 and we are actively working with MEP to resolve this individual case, which we anticipate to be resolved by October 2020. Contact will ensure any future non-compliances will be actioned as part of our monthly reconciliation process.</p>			Identified

Incorrect status recorded on the registry

One ICP, which was identified to have incorrect registry status, was a field contractor error. Registry status has been corrected now. Contact will continue to investigate errors from the field. These instances are regularly addressed via the contractor performance provisions within the respective agreements.

Submission against the RPS profile where the registry has a controlled profile

We continue our efforts to work with the MEPs as the cost to traders, such as Contact, of having to submit controlled load as RPS is significant and we believe also has the ability to distort the accurate application of UFE to all traders. Our focus is now moving to expired certified ICPs now that the population of the 'controlled device certified' flag on the registry is largely accurate.

Read and volume data accuracy

Contact continues to work on improving the timeframe for applying corrections to our volume data where an issue has occurred such as a stopped or bypassed meter of consumption on inactive ICPs. We continue to work with the MEP to further reduce the frequency of bridging meters and have also implemented a system improvement to apply a permanent estimate read when an actual read is not provided as part of a disconnection / reconnection.

Incorrect read dates were recorded

This issue only occurs for a small number of AMI meters where the communication performance is intermittent therefore no read was delivered for the scheduled meter read date. Unfortunately SAP is not able to amend the scheduled meter read date as it is associated with a corresponding billing order. We have identified an enhancement to SAP that would resolve this issue and awaiting prioritisation of this solution

CTCS

The switch and also then validation of a large generation ICP impacted the ability to run estimation process on TOU ICPs in July. We have now moved the estimations process to BD3 to allow more time and believe this resolves this particular issue.

CTCX

The incorrect recording of readings on 0000022997EA768 has been corrected.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact acknowledges the non-compliances identified by the auditors, and the underlying factors causing the late notifications to the Registry. We have extended our existing registry reconciliation reporting and will ensure any new exception categories are monitored and resolved on a monthly basis.		

Data transmission			
Non-compliance	Description		
<p>Audit Ref: 2.3</p> <p>With: Clause 20 Schedule 15.2</p> <p>From: 01-Jun-20 To: 30-Jun-20</p>	<p>CTCS</p> <p>June 2020 volume data for ICP 0000018218HRB13 was provided by email.</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 recorded as strong, this was a one off issue relating to a switch which was later withdrawn.</p> <p>There is no impact on settlement, Simply Energy and Contact worked together to ensure that the volumes applied for submission matched Contact's source file. The switch was later withdrawn and revisions will be provided in CTCT's submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The data provided to Simply Energy by Contact was marked as an estimate as the data was provided in a spreadsheet.		1/09/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We believe this is a one off incident.		01/09/2020	

Audit trails			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 21 Schedule 15.2 From: 01-Sep-19 To: 22-Jul-20	CTCS and CTCX Salesforce user IDs are shared, and the audit trails do not record the individual user who made the change. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong and the impact as low. Audit trails are available and contain the required information, but the person who processed the change is not identifiable within the audit trail because there is only one operator identifier. A small number of users have access. For the sample of audit trails reviewed, the person responsible for processing the change was identified through supporting information.		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy is currently reviewing the costs of increasing numbers of individual users in accessing Sales Force.		01/09/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
There is no further action here.		01/09/2020	

Electrical Connection of Point of Connection			
Non-compliance	Description		
Audit Ref: 2.11 With: Clause 10.33A From: 22-May-19 To: 25-Mar-20	CTCT 18 ICPs' meters were not recertified on unbridging. Six HHR new connections not certified within five days. 209 ICPs reconnected without having metering certified within 5 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		

Low	<p>The controls are rated as moderate. Uncertified meters are now identified but there is room for improvement to complete these in a timely manner.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We acknowledge that reconnections of ICPs have occurred without recertifying metering, particularly with legacy metering assets not owned by CTCT. A report is run to identify ICPs reconnected where the metering certification has expired, however the frequency of this report was not providing enough time for parties to meet the required 5 day timeframe. This process has since been amended to run daily to ensure that any parties involved have enough time to recertify the installation. With AMI assets: Service Orders (SOs) are issued to MEPs with an expectation that their asset is to be recertified for any unbridging cases. While reviewing historic SOs, it was identified that not all SOs specifically included an instruction to 'recertify'. The wording on the SO requests has now been amended to ensure that all unbridging requests include the request to recertify.</p>		01/09/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Updates to the processes have been outlined in the above actions taken to resolve.</p>		01/09/20	

Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-May-19</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>Registry information not provided within 5 business days of change.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are rated as moderate as Contact has good controls to manage registry accuracy but there is room for improvement.</p> <p>Overall the level of compliance is high with the majority of updates being completed within five business days of the event therefore the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Status and Trader updates</p> <p>All ICPs which were found to have incorrect status events applied in the registry were corrected during the audit. Additional training has been provided to ensure users are aware and follow the correct process.</p> <p>Contact will continue to investigate paperwork-related delays and errors from the field. These instances are regularly addressed via the contractor performance provisions within the respective agreements.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Contact acknowledges the non-compliances identified and the underlying factors causing the incorrect and late notifications to the registry. Ongoing training will be provided to staff as required.</p> <p>We will continue to investigate paperwork related delays and errors from the field. These instances are regularly addressed via the contractor performance provisions within the respective agreements.</p>	Ongoing	

Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 13-Sep-19</p> <p>To: 20-Apr-20</p>	<p>CTCT</p> <p>Three incorrect MEP nominations (ICPs 0000326268TPB75, 0000234047MPE57 and 0000543111TU747) not actioned to ensure that an MEP is recorded on 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	<p>The controls are rated as moderate as the nomination of the correct MEP in ORB process needs review.</p> <p>The volumes for the affected ICPs are being billed and submitted therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact is reviewing the MEP nomination rejection process in SAP system. We are actively working with field contractors to ensure correct MEP is recoded on the field paperwork.	Ongoing	Identified

We are in process of providing further training to users to ensure exceptions are handled efficiently and in timely manner.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Process review underway along with further user training as required.	Ongoing	

Provision of registry information			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 01-May-19</p> <p>To: 09-Apr-20</p>	<p>CTCT</p> <p>1,083 late changes to Active.</p> <p>328 late ANZSIC code updates.</p> <p>Contact was not recorded as the responsible participant in the registry on the active date for 1,083 ICPs.</p> <p>Incorrect active dates for some ICPs due to processing errors.</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 they have been improved during the audit period but there are opportunities for improvement.</p> <p>The audit risk rating is low, because the number of ICPs affected overall is small. Late changes to Active can mean submission information is not provided at the earliest opportunity. Billing will also be delayed for some ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>New Connections – NHH</u></p> <p>Contact has made process changes and revamped its reporting to identify any discrepancies. We have made system logic changes to pick up the variances much earlier in the process. We are continuously working with Distributors, MEPs and our field contractors to resolve date variance between Active status event, IED, and certification dates.</p> <p><u>Timeliness of status updates – NHH</u></p> <p>Contact has developed new reporting as well as changed its existing process since the last audit. We continue to monitor the accuracy and timeliness of status event data loaded in the Electricity Registry on daily basis through our robust reporting processes.</p>		Ongoing	Identified

Audit compliance reporting for period Jan 2020 (when process change was made) – Aug 2020 is showing big improvements:				
Timeliness	Audit 2019	Jan 2020 - Aug 2020		
Percentage Compliance	77%	89.94%		
Average Business Days between Status Active Event Date and Status Event input date	8	3.98		
<u>MEP nomination</u>				
Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.				
Preventative actions taken to ensure no further issues will occur			Completion date	
Ongoing reporting is in place to improve the compliance.			Ongoing	

ANZSIC codes			
Non-compliance	Description		
Audit Ref: 3.6 With: Clause 9 (1(k) of Schedule 11.1 From: 03-Jun-19 To: 31-May-20	CTCT, CTCS & CTCX Some incorrect ANZSIC codes. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate. Controls are being strengthened and this audit identified further opportunities to improve controls. There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity Authority's reporting accuracy, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
CTCT The one ICP with 'T9' ANZSIC code identified was gained incorrectly from alternate retailer. ICP has been vacant since our gain date and recently corrected to vacant-disconnected. As Contact has no customer to confirm end use of the property, ANZSIC code is correct as 'unknown'. All other ICPs, which were		Ongoing	Identified

<p>identified to have incorrect ANZSIC code, were corrected during the audit.</p> <p>CTCS/CTCX</p> <p>Simply plans to implement an enhancement to customer systems that will permit to add ANZSIC codes as a required field on sign up.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCT</p> <p>Contact has robust reporting in place to identify any 'T9' series ANZSIC codes applied in registry.</p> <p>We have extended our existing registry reconciliation reporting to ensure any new exception categories are monitored and resolved on a monthly basis.</p> <p>CTCS/CTCX</p> <p>The enhancement will ensure correct ANZSIC codes are applied at switch request as opposed to receiving incorrect codes from other Traders.</p>	Ongoing	

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 03-Jun-19</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>Daily unmetered kWh values are incorrect for 37 ICPs on the registry and five ICPs with the incorrect unmetered load description recorded.</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 the processes to monitor changes identify changes and historic unmetered loads are now being verified.</p> <p>The audit risk rating is low, because reconciliation is occurring correctly.</p>	
Actions taken to resolve the issue		Remedial action status
We have updated the ICPs that we believe are correct, and continue to make enquires with site owners where an owner is identified. We have since made 24 enquires confirming a site's		Identified

<p>current unmetered load values and/or if the unmetered site is required across a variety of unmetered sites and uses.</p> <p>Contact applies the same process for both standard and shared unmetered load where we undertake monthly and weekly validations of distributor details with our unmetered load values used for submission. In addition, our SAP system generates an exception (BPEM) whenever a new ICP switches to Contact with the distributor's UNM details field populated or where, for an existing ICP, SAP detects a change in the distributors UNM details via a registry event update.</p> <p>All unmetered load corrections now align with the date of the actual change as reported by network and or discovered as a result of other work.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Contact have identified historical validation issues in relation to historic sites and are undertaking a cleanup work programme to correct historical unmetered loads both on its own database and on the registry.</p> <p>The key objectives of the cleanup work programme will be to try to gather new information about any changes that may have occurred for historical unmetered loads and establish if they are to remain active or should be identified as not working / inactive, and or decommissioned and unmetered load removed.</p> <p>A future work programme will include the requirement that better and more detailed information must be provided (on proposed loads) by the customer or their agent.</p>	Ongoing	

Management of "active" status	
Non-compliance	Description
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 27-Dec-18 To: 17-Apr-19</p>	<p>CTCT</p> <p>Some incorrect Active dates.</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 the discrepancy reporting has been reinstated but some errors still occur.</p> <p>The audit risk rating is low, as the number of ICPs affected is small.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact has made process changes and revamped its reporting to identify any discrepancies. We have made system logic changes to pick up the variances much earlier in the process.</p> <p>We are continuously working with Distributors, MEPs and our field contractors to resolve date variances between Active status event, IED and certification dates.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing reporting is in place to resolve discrepancies.	Ongoing	

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 28-Aug-19</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>ICP 0000366150MP46C incorrectly recorded as disconnected on the registry but is active.</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>Strong controls are in place for the identification and management of discrepancies and the historic issues regarding consumption on inactive ICPs are being worked through.</p> <p>The number of ICPs affected is small, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>Consumption detected on inactive ICPs</u></p> <p>Contact continues to improve its controls around the management of inactive consumption which can be seen by the reduced volume of consumption identified. This improved monitoring is also enabling refresher training to users where human error was involved.</p> <p>We continue to engage with other traders where we detect an ICP being reconnected prior to the switch date in order improve the behaviour around this process between participants. For the period this audit covers we identified 225 instances where this scenario has occurred.</p>	1/10/2021	Identified

<p>Investigation confirmed that incorrect streetlights were disconnected by CTCT in error due to incorrect address information on the Registry.</p> <p>A new request was raised to MPOW to reconnect Bradley Road lights for Waimakiriri District Council.</p> <p>CTCT has reactivated ICP 0000366150MP46C in SAP and Registry, ensuring the load is correctly included in energy submission data.</p> <p>We have ensured that SAP has been updated to include all 22 HPS 70W lights which have been identified as connected to this street lighting circuit.</p> <p>CTCT's 14 Month washup for the September 2019 period to include all of CTCT's under submitted volume from 22/8/2017 to 31/7/2019. Correct monthly volumes will be submitted going forward from 1/8/2020.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>MPOW has corrected the Registry address information for Ohoka Downs streetlights ICP using their GIS information available.</p> <p>Establishment of a QA process to review correct instructions are issued for any future Service Order to disconnect DUML streetlights. This should include streetlight address and pole number references.</p>	31/12/2020	

Losing trader response to switch request and event dates - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.2</p> <p>With: Clause 3(a)(ii) of schedule 11.3</p> <p>From: 03-Jun-19</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>"MU" AN code incorrectly being sent when metering is not loaded at the time of the AN being sent.</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	<p>The controls are rated as moderate as SAP assigns the AN code based on a hierarchy but if metering is not loaded at the time of the loss SAP will incorrectly apply the MU code.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
CTCT Contact believes that there is a robust structure in place for the AN codes in SAP. The issue found for a couple of ICPs with 'MU' code being sent to registry were due to timeliness as metering data was not setup yet from recent switch gain. Contact will review SAP logic for sending ANs. Depending upon the outcome of this investigation, a potential fix may be deployed.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact will review SAP logic for sending ANs. Depending upon the outcome of this investigation, a potential fix may be deployed.	Ongoing	

Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 01-Jun-19 To: 31-May-20	CTCT One late CS file. The average daily consumption calculation was not calculated from the validated read to read period until March 2020. Some incorrect last read dates provided. One instance of the an actual read for the event date sent as an estimate read. CTCS The average daily consumption calculation was not calculated from the validated read to read period. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating
Low	The controls are recorded as moderate overall, but I note that Simply Energy's current average daily consumption calculation will not achieve compliance for short periods of supply. 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
<p>CTCT</p> <p><u>One late CS file</u></p> <p>This was identified as a one-off operator error. Further training has been provided to prevent this issue in the future.</p> <p><u>Average daily consumption</u></p> <p>As noted, system enhancement was deployed in March 2020 to resolve this non-compliance. We are continuously working with our IT team to further improve our system logic to account for different scenarios.</p> <p><u>Some incorrect last read dates provided</u></p> <p>Fix for ICP 0321943651LC541 was deployed in late August 2019, not March 2020. No further re-occurrence of this error has been identified.</p> <p>Error on ICP 0000217183MPA9B was a user error and further training has been provided to the operator to prevent this issue from re-occurring in the future.</p> <p><u>One instance of an actual read for the event date sent as an estimate read</u></p> <p>Contact has raised relevant IT ticket to investigate this issue. Depending upon the outcome of this investigation, we anticipate a fix will be deployed.</p> <p>CTCS/CTCX</p> <p>We have identified the issue now and have added a different process to enable compliance.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCT</p> <p>Contact has provided further training to operators and continuously working alongside our IT team to further enhance system logics which will resolve these non-compliances.</p> <p>CTCS/CTCX</p> <p>A new process has been developed and tested and is now ready for deployment, from 3 September 2020 we will be compliant.</p>	Ongoing	

Retailers must use same reading - standard switch			
Non-compliance	Description		
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 03-Jun-19 To: 31-May-20	CTCT 45 late RR files. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong with good visibility of ICPs requiring RRs. The impact on settlement is minor because the number of ICPs is low; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact has good process in place for ICPs requiring RRs however some delays are unavoidable (i.e. access issues to read the meters). We are continuously making improvements to reduce these non-compliances.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above.		Ongoing	

Non-half hour switch event meter reading - standard switch			
Non-compliance	Description		
Audit Ref: 4.5 With: Clause 6(2) and (3) Schedule 11.3 From: 15-Aug-19 To: 29-Aug-19	CTCT 2 RR requests incorrectly rejected resulting in the gaining trader submitting 3,063 kWh more than their gain reads. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as Contact's expectation that an email accompany all RR requests is outside of the code requirements and therefore RRs may be rejected incorrectly.		

	The audit risk rating is assessed to be low but I note that this has the potential to be a medium impact if the volumes were larger and the impact on smaller traders is that they have to buy volume that can't be billed on their customer, and the volumes will be submitted for the wrong period.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact has reviewed its processes to improve management of ACs. Further training has been provided to the users to ensure this does not re-occur.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact provides ongoing coaching as required.		Ongoing	

Gaining trader informs registry of switch request - switch move			
Non-compliance	Description		
Audit Ref: 4.7 With: Clause 9 of Schedule 11.3 From: 01-Jun-20 To: 01-Jun-20	CTCS Incorrect switch type used for 3 DUMML ICPs switching in. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as the controls to determine the correct switch type are robust. The MI switch type is used so that Contact gains the customer for the correct contract start date. The audit risk rating is low as this has no impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
The 3 ICPs were part of the mass switch over on 1 June 2020. If the ICPs had been switched using the correct type the switch date may have been different.		01/09/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Working with other traders when doing mass switch overs to confirm that they will release on the correct date.		01/09/2020	

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) of Schedule 11.3</p> <p>From: 05-Jun-19</p> <p>To: 01-Apr-20</p>	<p>CTCT</p> <p>A small number of late CS files sent.</p> <p>CTCS</p> <p>No AN sent for one ICP.</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 as whilst Contact's processes are automated, Simply Energy's process is manual.</p> <p>The audit risk rating is low as the small number of late files were only a few days late and this will have no material impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT</p> <p>Contact is reviewing the process to reduce these non-compliances. As the auditor has noted, late CS files were due to data fix required. Contact strives to overcome this through further training and will investigate additional exception reporting.</p> <p>CTCS</p> <p>Processes have already been updated so that AN files are sent for all NT move ins.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>CTCT</p> <p>Ongoing coaching and reporting as required.</p>		Ongoing	

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>CTCT</p> <p>The average daily consumption calculation was not calculated from the read to read period until March 2020.</p> <p>Incorrect last read date provided for at least one ICP.</p>

<p>From: 03-Jun-19</p> <p>To: 31-May-20</p>	<p>CTCS</p> <p>The average daily consumption calculation was not calculated from the validated read to read period.</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	<p>The controls are recorded as moderate overall, but I note that Simply Energy's current average daily consumption calculation will not achieve compliance for short periods of supply.</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>CTCT</p> <p>Average daily consumption. As noted, a system enhancement was deployed in March 2020 to resolve this non-compliance. We are continuously working with our IT team to further improve our system logic to account for different scenarios.</p> <p>Incorrect last read date provided for at least one ICP. Error on ICP 0000033716WE54B was a user error and further training has been provided to the operator to prevent this issue from re-occurring in the future.</p> <p>CTCS/CTCX</p> <p>We have identified the issue now and have added a different process to enable compliance.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Contact has provided further training to operators and continuously works alongside our IT team to further enhance system logics which will resolve these non-compliances.</p> <p>CTCS/CTCX</p> <p>A new process has been developed and tested and is now ready for deployment, from 3 September 2020 we will be compliant.</p>		Ongoing	

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
Audit Ref: 4.11 With: Clause 12 of Schedule 11.3 From: 03-Jun-19 To: 01-May-20	CTCT 99 late RR files. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong with good visibility of ICPs requiring RRs. The impact on settlement is minor because the number of ICPs is low; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact has good process in place for ICPs requiring RRs however some delays are unavoidable (i.e. access issues to read the meters). We are continuously making improvements to reduce these non-compliances.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Losing trader provision of information - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.13 With: Clause 15 of Schedule 11.3 From: 03-Jun-19 To: 31-May-20	CTCT "CO" AN code sent incorrectly. Potential impact: None Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as SAP assigns the AN code based on a hierarchy. The audit risk rating is low as this has no direct impact on reconciliation.		

Actions taken to resolve the issue	Completion date	Remedial action status
Our Commercial Sales team supply a fortnightly report of C&I HHR ICP's with expiring energy agreements to assist with the proactive management of HHR Switch Losses by the Operations team. Due to the current energy market and Covid-19 conditions there have been delays in customers determining their new Retailer going forward which impacts the our ability to manage switch losses in the most effective manner. An Existing SAP system restriction results in the customer's accounts not being able to be closed to enable the correct AN code to be automatically sent to new Retailer. Our current approach by the business eliminates risk of impacting CTCT's Reconciliation Submission Data if Customer Account/ICP was end dated and the ICP does not switch away in a timely manner and CTCT is still current Retailer on Registry.	30/9/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT is transitioning C&I TOU ICP's to a new system which provides a more effective platform to manage HHR Customer contracts/products and ensure the correct AN code is sent.	30/4/2021	

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: 03-Jun-19</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>Six switch withdrawals not resolved within ten business days of the withdrawal being initiated.</p> <p>At least one incorrect NW code sent.</p> <p>215 late NW files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are strong for the management of withdrawals. These are worked on a case by case basis except for transfer requests received on vacant properties where a wrong switch withdrawal is issued by SAP.</p> <p>There was a minor impact on settlement due to the correction of consumption information. There was also a minor impact on the customer; therefore, the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact has robust process in place. As noted, most of the withdrawals are related to wrong premises which can involve lengthy and complex investigations with different participants hence some delays are unavoidable.</p> <p>The one instance where incorrect an NW code was sent due to user error. Further coaching has been provided to mitigate this issue.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing coaching as required.	Ongoing	

Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 23-May-19</p> <p>To: 23-May-19</p>	<p>CTCT</p> <p>One CS file did not reflect the actual reading or best estimate of an actual reading on the event date.</p> <p>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>The controls are recorded as strong, as the processes in place are largely automated and the correct read or estimate is sent. This was an exception.</p> <p>The impact on settlement and participants is minor; the kWh difference in readings was small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact has raised an IT ticket to investigate this issue. Depending upon the outcome of this investigation, we anticipate a fix will be deployed.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
IT ticket has been raised to investigate and implement a fix.	Ongoing	

Maintaining shared unmetered load			
Non-compliance	Description		
Audit Ref: 5.1 With: Clause 11.14 From: 03-Jun-19 To: 31-May-20	CTCT One ICP with missing shared unmetered load due the BTS supply being removed. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong because they mitigate risk to an acceptable level. The impact on settlement is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The affected ICP has now been corrected from unmetered BTS to now show the shared PROW street light values. Network reporting and improved unmetered BTS to Perm process to ensure end dating / removal of the unmetered load values following meter installation will detect and reduce these kinds of issues.		20 May 2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
As required, through continued monitoring		Ongoing	

Unmetered threshold			
Non-compliance	Description		
Audit Ref: 5.2 With: Clause 10.14 (2)(b) From: 02-Apr-18 To: 31-May-20	CTCT One standard unmetered ICP has an estimated annual consumption over 6,000 kWh per annum. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are strong with regard to identifying and attempting to resolve the any ICPs with loads that exceed the allowable threshold.		

	There is no suggestion that settlement is inaccurate, therefore the impact is considered minor and the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
No further action required (see 5.3)	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Improved load type data gathering will assist in the identification of sites with excess loads and reporting will assist in detection.	Ongoing	

Unmetered threshold exceeded		
Non-compliance	Description	
<p>Audit Ref: 5.3</p> <p>With: Clause 10.14 (5)</p> <p>From: 14-Jun-18</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>One standard unmetered ICP has estimated annual consumption over 6,000 kWh per annum and has not been resolved within 20 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong as there are robust processes in place to monitor unmetered loads. In this instance it has taken longer than expected to get this load metered.</p> <p>There is no suggestion that settlement is inaccurate, therefore the impact is considered minor and the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The ICP in question is to be metered across three new ICPs. At this stage Contact is exploring options with the customer to get the required on site work completed. It is a retirement village and we are currently waiting on approval to begin required site work and alterations.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Improved load type gathering will assist identification of sites with excessive loads	Ongoing	

Distributed unmetered load

Non-compliance	Description		
<p>Audit Ref: 5.4</p> <p>With: Clause 11 of schedule 15.3</p> <p>From: 03-Jun-19</p> <p>To: 31-May-20</p>	<p>CTCT</p> <p>The monthly database extracts used to derive submission from are provided as a snapshot and do not track changes at a daily basis as required by the code.</p> <p>Inaccurate submission information for several databases.</p> <p>Four streetlight audits not submitted by the due date.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<p>High</p>	<p>The controls in place mitigate risk most of the time, therefore the control rating is moderate.</p> <p>There is a major impact on settlement outcomes because there are examples of over submission and under submission; therefore, the audit risk rating is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>Monthly Snapshot vs Daily.</u></p> <p>Contact believes the difference between daily updated streetlight counts compared to a monthly snapshot is within a similar accuracy tolerance a physical metering installation of equivalent size has under the code however unmetered installations are not provided any accuracy tolerance in the calculation of consumption information.</p> <p>The additional effort and cost to comply with these clarified code requirements will ultimately result in increased costs and administration for the end consumer with minimal if any submission accuracy benefit.</p> <p>Contact Energy are investigating how we can be compliant with the new clarification of this rule – received on 28 June 2019. And we will update our DUML customers of this additional database accuracy requirement.</p> <p>We are looking at how we can ensure our customers have accurate databases that can provide report of this data complete with a daily breakdown and if the database providers have any existing reports that will help with this.</p> <p>We also need to look at how this can be done on a daily basis in our system. This will not be a quick change.</p> <p><u>Database Accuracy – All Councils</u></p>			<p>Identified</p>

We continue to work with our customers on their databases to ensure they are the most accurate and compliant that they can be.

All HHR DUML ICP's will be switching to CTCS by the 31/12/2020 and the business needs to establish new processes between both CTCT/CTCS to ensure DUML compliance is still maintained/improved upon and all outstanding issues resolved.

This includes trying to identify further opportunities to leverage off CTCS's systems and technologies to improve processes and ultimately CTCT's overall DUML accuracy and compliance.

Auckland Transport: Over submission because dimming is not accounted for.

This issue was raised during the DUML audit meeting between Auckland Transport, Veritek and CTCT, with update from David Dick from Auckland Transport confirming they are still following up with the Electricity Authority to gain compliance for their CMS system to be utilised.

Once approval has been obtained, CTCT will work with the customer to establish the new processes that will be required for the calculation the streetlight consumption for these ICP's each month.

Christchurch City Council: Smart lights (operated by light sensor) incorrectly recorded as reconciled elsewhere and the load controlled by the SCADA resulting in the incorrect burn hours being used.

Contact is actively trying to arrange for a data logger to be installed that will record the actual hours of operation for these lights. While the smart lights are not part of the Orion ripple controlled circuit but operated via a light sensor – we have confirmed with Orion that their ripple control circuit is also triggered by a light sensor meaning both circuits are materially aligned in terms of on/off times.

Ohoka Downs Community lights

Please see full details in Audit Ref: 3.9 With: Clause 19 of schedule 11.1

SAP Installation Fact has been updated to include all 22 HPS 70W lights which should be connected to this street lighting circuit.

CTCT's 14 Month washup for the September 2020 period to include all of CTCT's under submitted volume from 22/8/2017 to 31/7/2019. Correct monthly volume to be submitted going forward from 1/8/2020.

Overdue DUML Audit Reports

CTCT acknowledges not all draft audit reports have been responded to within the required timeframes. Delays here have

<p>been caused by the restructuring that has occurred in the Operations team, Covid-19 impacts and inadequate structures being in place now that the Operations team is responsible for DUML compliance activities.</p> <p>The four overdue reports will be finalised by 30/9/2020 and more effective processes and controls implemented to ensure ALL DUML workflows are actioned fully and in a timely manner.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We are working on a process, system enhancements and customer understanding</p> <p>Quarterly database checks are being conducted on each of our customers databases. We work closely with the customers to ensure they are as compliant as they can be.</p>	Ongoing	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 20-May-19</p> <p>To: 24-Mar-20</p>	<p>CTCT</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 164 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they are sufficient to reduce the risk most of the time.</p> <p>The audit risk rating is low. Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons. Corrections are processed as discussed in section 8.1.</p>	
Actions taken to resolve the issue		Completion date
<p><u>Bridged meters</u></p> <p>Contact has been working with our MEPs to reduce the incidence of bridging as can be seen by the reduction in the number of corrections undertaken over the last 12 months. Additionally 3 of our AMI MEPS are undertaking either mass modem upgrades to 4G or mass upgrades of AMI metering equipment which is</p>		Ongoing
		Identified

expected to improve remote reconnection service performance and further reduce incidences of meter bridging.		
Preventative actions taken to ensure no further issues will occur	Completion date	
See above	Date	

Reporting of defective metering installations		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 10.43(2) and (3)</p> <p>From: 01-Aug-19</p> <p>To: 25-Mar-20</p>	<p>CTCT</p> <p>The MEP was not advised of six bridged meters.</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 recorded as moderate, the MEP is advised of defects except where legacy meters are unbridged by Delta without being replaced.</p> <p>The audit risk rating is low based on the number of ICPs affected.</p>	
Actions taken to resolve the issue		Completion date
<p>On review of why our service provider (Delta) did not replace the legacy meter whilst resolving the bypass, we have found a gap in our process which has since been resolved.</p> <p>From the six reviewed:</p> <ul style="list-style-type: none"> One related to a contact Prepower meter (Currently there are less than 20 active Prepower ICPs left as we continue to replace this old product). The wrong process was used by the contractor (required an activation code, not a meter bypass). The other five related to AMI Meters that had been incorrectly assigned to our legacy service provider (Delta). All five related to a particular type of service order involving customer switching which unfortunately lead to AMI meters being bypassed. The unbridged meter should have been assigned directly to the MEP, however due to a timing issue and the device information not being present in our system it defaulted to the legacy service order process. 		01/09/20
Preventative actions taken to ensure no further issues will occur		Completion date

A new internal control has now been added. Instead of the 'unbridge meter' service order being directly assigned to a third party contractor (Delta) the Field Services team validate the metering equipment MEP and manually assign (same day) to either the MEP (AMI assets) or if it is a legacy meter, to Delta.	01/09/20	
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NHH reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 18-Jul-19</p> <p>To: 22-Jul-20</p>	<p>CTCT</p> <p>Incorrect switch event meter reads sent.</p> <p>NHH meter readings not applied at 2400 on the day of the meter reading for NHH to HHR upgrades and downgrades.</p> <p>Where a reading is not received for all registers on the meter read order date SAP retrieves the nearest actual reading within the last three days for AMS, Smartco, Metrix and FCLM and the nearest actual reading within the last two days for all other providers, and records it as an actual reading against the meter read order date. This resulted in readings for two registers for ICP 0000017802EAAC8 being recorded with incorrect read dates.</p> <p>CTCS</p> <p>Simply Energy supplied NHH end readings to EMS for ICP 0000022997EA768, which did not correspond to the end of the last NHH day for the ICP.</p> <p>Potential impact: None</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate overall because they will not consistently ensure that reads are recorded with the correct read date in situations where a read is not available on the meter read order date. Where reads are available on the meter read order date, or are not available on the meter read order date or the previous three days, reads will have the correct read date recorded.</p> <p>The controls over upgrades and downgrades are strong, and the controls over upgrade and downgrade meter readings provided to EMS are moderate due to the manual process.</p> <p>There is expected to be a minor impact on submission because some reads will be attributed to an incorrect date. There may be a minor impact on other participants if an ICP switches on an affected reading.</p>	
Actions taken to resolve the issue		Remedial action status
CTCX		Identified

The end readings for ICP 0000022997EA768 have been amended and the correct values are now reconciled.		
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCX No further action here.		

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-May-19</p> <p>To: 02-May-20</p>	<p>CTCT</p> <p>For at least ten ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak as they are not sufficient to ensure the best endeavours requirement is met where the period of supply is less than nine months.</p> <p>The audit risk rating is low, as most of the ICPs without a read during the period of supply appear to have been supplied for a short period.</p>	
Actions taken to resolve the issue		Remedial action status
<p>Contact acknowledges that the transitional stage of moving to a new meter reading provider (AD Riley) has taken significantly longer than anticipated. Up until recently our service provider has struggled to find the right resource model after onboarding a couple of decent sized customers (retailers). It's fair to say that the underlying resource issues and resulting volumes of 'attempted readings' are in far better shape (ICPs not attempted generally sitting around 1% on any week – excluding Covid) and this enables us to shift the focus towards attainment of successful readings.</p> <p>The impact of Covid 19 had also compounded our results in recent times with Contact and ADR having to suspend legacy meter reading during alert level 4 and more recently, for internal meters under level 3.</p> <p>Legacy meter reading challenges have been front of mind for us over the past 12 months and both Contact and ADR have implemented a number of notable items to ensure we're heading</p>		<p>Ongoing</p> <p>Identified</p>

<p>in the right direction. Some key improvements or controls are listed below:</p> <ul style="list-style-type: none"> • Contact has enhanced our NHH meter reading reports (both the 12 month and 4 month views) so that we are able to identify and target exception cases proactively. We have taken this to the next level and used the data to proactively engage with customers through a variety of channels (email/SMS) to attempt to gather meter readings, admittedly for billing accuracy purposes, however also enables us to capture important location and access information. We have also introduced smarter ways for customers to submit their own reads via the Contact App (although it is still an estimate read we are eliminating potential bill shock issues). Contact recently carried out targeted special reads on over 4,000 ICPs at customer properties to fulfil our 365 compliance obligations. • With resourcing issues now under control, Contact has initiated a specific programme of work to improve successful read attainment where we are seeing a higher number of 'no read cases' returned from our service provider. <p>ADR have also implemented new technology on the hand held RDA equipment such as;</p> <ul style="list-style-type: none"> • Priority scheduled read process; highlights to the reader if previous actual was not completed (therefore eliminated sequential read issue (other than true no access problems). • GPS coordinates (showing the meter reader a locational aid if the meter reader cannot find the meter) • Obtaining photographs when completing an actual reads – these are provided to Contact via a data base portal which helps with our internal validation processes. <p>While ADR has had some significant operational and resource tests they have risen to the challenge and reinforced our decision to utilise their ability to implement system solutions and use technology to improve the legacy meter reading function.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
Outlined above.	Ongoing	

NHH meters interrogated annually	
Non-compliance	Description
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p>	<p>CTCT</p> <p>For at least seven ICPs supplied for over 12 months, exceptional circumstances did not exist, and the best endeavours requirements were not met.</p> <p>There are some meter read frequency report accuracy issues.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p>

From: Oct-19 To: Jul-20	Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate because the MRC process is usually sufficient to ensure that the best endeavours requirement is met within 12 months, but parts of the process were temporarily suspended during the audit period.</p> <p>The audit risk rating is low, because 12 month read attainment is around 99%, and the report accuracy issues are expected to have a minor impact.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We acknowledge that the past 12 month NHH Mater annual interrogation process has not been to the standard as previous years.</p> <p>Actions taken as discussed in section 6.8 above.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Preventative actions taken as discussed in 6.8 above.</p> <p>We have also added a weekly update meeting with ADR (MRS) management team to ensure both parties are working together to bring the process back up the agreed SLAs.</p>		Ongoing	

NHH meters 90% read rate	
Non-compliance	Description
<p>Audit Ref: 6.10</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: Oct-19</p> <p>To: May-20</p>	<p>CTCT</p> <p>For at least eight ICPs supplied for over four months, exceptional circumstances did not exist, and the best endeavours requirements were not met.</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>Controls are rated as weak because the MRC process is not sufficient to ensure that the best endeavours requirement is met within four months.</p> <p>The audit risk rating is low, because four month read attainment is around 93% and is expected to improve.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
As per section 6.8 and 6.9 above, we acknowledge that NHH meters 90% read rate has dropped this year and COVID19 impacted the process during the earlier quarter of 2020. We are actively working with our meter reading provider (ADR/MRS) to ensure that the four month read attainment process improves as quickly as possible.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> New internal controls added such as better reports showing sequential estimated reads (as well non read codes used) ADR sends a monthly Stats report which is reviewed in our management meeting (with ADR) Weekly meetings with ADR team (which include an action register) to ensure both parties are working on valued betterment processes. <p>Current quarter: Our stats show that attainment levels have been improving steadily through the past quarter – the only negative will relate to Auckland Covid19 level 3 lockdown, which stopped the meter readers from reading meter that were located inside properties.</p>	Ongoing	

Identification of readings	
Non-compliance	Description
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3) Schedule 15.2</p> <p>From: 18-Jul-19</p> <p>To: 22-Jul-20</p>	<p>CTCT</p> <p>Where a reading is not received for all registers on the meter read order date SAP retrieves the nearest actual reading within the last three days for AMS, Smartco, Metrix and FCLM and the nearest actual reading within the last two days for all other providers, and records it as an actual reading against the meter read order date. This resulted in readings for two registers for ICP 0000017802EAAC8 being recorded with incorrect read dates and types.</p> <p>One incorrect actual read labelled as an estimate in a CS file.</p> <p>CTCX</p> <p>Simply Energy supplied NHH end readings to EMS for ICP 0000022997EA768, which did not correspond to the end of the last NHH day for the ICP.</p> <p>Potential impact: None</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate overall because they will not consistently ensure that reads are recorded with the correct read date and type in situations where a read is not available on the meter read order date. Where reads are available on the meter read order date, or are not available on the meter read order date or the previous three days, reads will have the correct read date recorded.</p> <p>The controls over upgrade and downgrade meter readings provided to EMS are moderate due to the manual process.</p> <p>There is expected to be a minor impact on submission because some reads will be attributed to an incorrect date. There may be a minor impact on other participants if an ICP switches on an affected reading.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This issue only occurs for a small number of AMI meters where the communication performance is intermittent therefore no read was delivered for the scheduled meter read date. Unfortunately SAP is not able to amend the scheduled meter read date as it is associated with a corresponding billing order. We have identified an enhancement to SAP that would resolve this issue and we are awaiting prioritisation of this solution</p> <p>CTCX</p> <p>The NHH end readings for ICP 0000022997EA768 have been resolved and are now reconciled accurately.</p>		TBC	Investigating

Meter data used to derive volume information	
Non-compliance	Description
<p>Audit Ref: 9.3</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Sep-19</p> <p>To: 22-Jul-20</p>	<p>CTCS and CTCX</p> <p>EDMI provides HHR interval data for some ICPs rounded to two decimal places.</p> <p>NHH raw meter data received from all MEPs and agents except FCLM and WASN is rounded upon receipt into Datahub and not when volume information is created if it is provided with decimal places.</p> <p>Customer readings are not consistently entered into Datahub with decimal places where this information is provided by the customer.</p> <p>Any NHH data recorded with decimal places in Datahub is rounded to the nearest whole number when exported to EMS' MADRAS for reconciliation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: 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 considered weak, because all NHH meter information is rounded before it is entered into MADRAS where reconciliation submissions are calculated.</p> <p>The audit risk rating is low, because only NHH meter readings provided with decimal places are affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact will engage with EDM I to address the precision issue relating to the interval data files provided by EDM I to the respective Contact settlement systems.		Dec 2020	Identified
Changes to all read files has already been actioned to allow consistency through the Simply Energy systems. This data also flows to MADRAS so this is also updated as part of the change.		01/09/2020	
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action is required.		01/09/2020	

Half hour estimates	
Non-compliance	Description
<p>Audit Ref: 9.4</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Sep-19</p> <p>To: 22-Jul-20</p>	<p>CTCS and CTCX</p> <p>HHR estimates were not consistently created where HHR trading period data was missing. Estimates were created for revision submissions.</p> <p>CTCS</p> <p>Some HHR volumes estimates for CTCS did not meet the reasonable endeavours requirements for June 2020. The estimated data was replaced by revision 1.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>The controls are rated as moderate because there is a process in place, but some improvement is required to ensure compliance.</p> <p>The audit risk rating is medium, the CTCS customer base is expected to grow which will increase the risk of future non-compliance because the estimation process is partly manual.</p>

	<ul style="list-style-type: none">For CTCS 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 low because corrected data will be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT HHR</p> <p><u>Some ICPs were missing from submissions.</u></p> <p>We have established a more robust reconciliation process utilising the GR090 ICP Missing file to identify underlying set up issue within our settlement system and also interval data delivery issues.</p> <p>We have undertaken a reconciliation of historical GR090 reports and existing identified all ICP exceptions and we will resolve these issues in time for the next scheduled wash up.</p> <p>We are also automating this reconciliation to enable more timely monitoring of any issues impacting our HHR submissions.</p> <p>CTCX</p> <p>EMS has admitted to the error and data will be included in future revisions.</p> <p>CTCS</p> <p>Moving the temporary estimate process to BD3 has allowed more time to resolve any issues and we don't expect any further non-compliance in this area.</p>	Resolved	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT - HHR</u></p> <p>Create monthly reporting of number of exceptions on future GR090 reports to track progress of identification and resolving ICP Missing issues in HHR AGG or Registry.</p> <p>CTCS</p> <p>Process timings have been updated.</p>	Dec 2020	

Electricity supplied information provision to the reconciliation manager	
Non-compliance	Description
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7</p>	<p>CTCT</p> <p>Alleged breach 2005CTCT1 recorded that CTCT submitted volume for a GD NSP (BDE0111-SOLE) in their AV-120 202004 initial submissions on BD4.</p>

<p>From: 01-Mar-20</p> <p>To: 30-Jun-20</p>	<p>CTCX</p> <p>The Mar-20 to Jun-20 billed volumes are inconsistent with the Mar-20 to Jun-20 submission volumes.</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 overall.</p> <ul style="list-style-type: none"> For CTCT controls are strong, and sufficient to ensure submission is accurate almost all the time. For CTCX controls are rated as moderate, as the reasons for the difference could not be determined. The files are generated from AXOS, and there are monitoring controls in place. <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. The incorrect line was removed by the RM for CTCT.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT</p> <p>Contact acknowledges that we included a record in our AV-120 file for a GD connection when the RM functional spec requires that GD reconciliation types are to be excluded. Our SAP system automatically includes electricity supplied records for all electricity bills and we have a manual process to remove this record from our file prior to submission. A defect ticket has been raised to allow SAP to filter out GD records for this submission file. We are awaiting prioritisation of this fix.</p> <p>It is important to note that this AV-120 file was run through the RM file checker process and this did not detect this issue – it is unfortunate that the file checker rules were not designed to align with the functional specification requirements.</p> <p>Additionally, as this erroneous line related to a GD NSP there is no impact as GD NSPs are not part of be billed vs submitted comparison performed by the RM.</p> <p>CTCX</p> <p>The differences have been investigated and the two issues found are in the process of being corrected. By Revision 7 these discrepancies will be resolved.</p>		TBC	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

CTCT A defect ticket has been raised to allow SAP to filter out GD records for this submission file. We are awaiting prioritisation of this fix. CTCS/CTCX Improved validation reporting to ICP has been implemented.	TBC	
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HHR aggregates file	
Non-compliance	Description
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: Jul-19</p> <p>To: Jul-20</p>	<p>CTCT</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>Some ICPs were missing from submissions due to incorrect settlement unit data or delays in creating profiles to store HHR data. Revised data will be provided through the revision process.</p> <p>CTCX</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>EMS omitted ICP 0158947339LC9D1 from all revision submissions after Simply Energy commenced producing HHR aggregates and volumes from June 2020. EMS reinstated the ICP on 06/07/20 and will ensure it is included in future revision submissions for periods up to May 2020.</p> <p>One ICP was missing from the May 2020 initial submission because of a Datahub profile discrepancy, which was corrected prior to revision 1.</p> <p>CTCS</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>HHR submissions were understated for the May and June 2020 initial submissions because some ICPs were not set up in time, and temporary estimates were not created where data was missing. Revised data will be provided through the revision process.</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: 4</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>The issue relating to content of the aggregates file is an error in the code, Contact is providing submission information as expected.</p> <p>The controls are rated as moderate overall:</p> <ul style="list-style-type: none"> For CTCT system changes have been made, and further changes are underway to address the settlement unit issues. Issues that had not been

	<p>addressed by the system fix were being detected, but correction was not occurring as intended due to a training/process issue which has now been resolved.</p> <ul style="list-style-type: none"> For CTCX the missing revision data appears to be caused by an isolated administrative error. For CTCS 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 medium based on the volume differences identified, and corrected data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT</p> <p><u>HHR aggregates file does not contain electricity supplied information</u></p> <p>We believe that due to conflicts between the Code and the RM functional specification we are not able to comply with both sets of requirements.</p> <p><u>Some ICPs were missing from submissions.</u></p> <p>We have established a more robust reconciliation process utilising the GR090 ICP Missing file to identify underlying set up issue within our settlement system and also interval data delivery issues.</p> <p>We have undertaken a reconciliation of historical GR090 reports and existing identified all ICP exceptions and we will resolve these issues in time for the next scheduled wash up.</p> <p>We are also automating this reconciliation to enable more timely monitoring of any issues impacting our HHR submissions.</p> <p>CTCS</p> <p>The mass switch over as reported previously and the ICPs switching in on 31 May 2020 contributed to this issue.</p>		<p>Ongoing</p> <p>Implemented</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>CTCT</p> <p><u>HHR aggregates file does not contain electricity supplied information</u></p> <p>We were under the impression that the Authority was going to investigate and resolve the conflict as part of the 2019 Code Review omnibus.</p> <p><u>Some ICPs were missing from submissions</u></p> <p>We are automating this reconciliation to enable more timely monitoring of any issues impacting our HHR submissions.</p> <p>CTCS</p>		<p>Ongoing</p> <p>31 Dec 2020</p>	

The mass switch over as reported previously and the ICPs switching in on 31 May 2020 contributed to this issue.		
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCS/CTCX Running temporary estimates on BD3 now will assist in resolving these issues.		

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.6</p> <p>With: Clause 15.11</p> <p>From: 01-Mar-20</p> <p>To: 31-Mar-20</p>	<p>CTCT</p> <p>Alleged breach 2004CTCT1 recorded that CTCT submitted some incorrect NSP volumes information to the RM for the March 2020 initial allocation.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate, as they are sufficient to ensure submission is accurate most of the time.</p> <p>The impact on settlement is high, based on the kWh difference, but washed out with revision 1.</p>	
Actions taken to resolve the issue		Remedial action status
<p>Contact has implemented the additional checks to compare volumes received by our Generation metering system (MV90) with our SAP submission system.</p> <p>We have also escalated this issue to the Vendors of our SAP submission system as two attempted system fixes have failed to resolve this issue.</p>		June 2020 Identified
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Contact has implemented the additional checks to compare volumes received by our Generation metering system (MV90) with our SAP submission system.</p> <p>We have also escalated this issue to the Vendors of our SAP submission system as two attempted system fixes have failed to resolve this issue.</p>		June 2020

Accuracy of submission information			
Non-compliance	Description		
Audit Ref: 12.7 With: Clause 15.12 From: 01-Jul-18 To: 27-Jun-19	CTCT, CTCX and CTCS Some submission data was inaccurate and was not corrected at the next available opportunity. Potential impact: Medium Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate overall: <ul style="list-style-type: none"> For CTCT system changes have been made, and further changes are underway to address remaining issues. For CTCX the missing HHR revision data appears to be caused by an isolated administrative error, and the incorrect end date was a manual data processing error. For CTCS 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. The impact is medium based on the volume differences identified, and corrected data will be provided through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
CTCS/CTCX Omission of previously submitted data has been identified and will be resolved going forward for any future revisions.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
CTCS/CTCX Running temporary estimates on BD3 now will assist in resolving these issues.		Date	

Permanence of meter readings	
Non-compliance	Description
Audit Ref: 12.8 With: Clause 4 Schedule 15.2	CTCT Some estimates were not replaced by revision 14. Potential impact: Medium

<p>From: Nov-18 r14</p> <p>To: Jan-19 r14</p>	<p>Actual impact: Unknown</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate, because there are processes in place to attain readings by revision 14 and enter permanent estimate readings. Contact has made good progress on resolving the issues relating to phantom meters and consumption record defects and is working on the other issues which are causing permanent estimates.</p> <p>The potential impact is rated as low. There was 808,327.4 kWh of forward estimate over three months and the impact is dependent on the accuracy of these estimates. There are sound estimation processes, therefore I have recorded the audit risk rating as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We continue to identify and resolve these system and process issues with a dedicated team involving developers, system testers and users.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We continue to resolve these system and process issues with a dedicated team involving developers, system testers and users.</p> <p>Contact is actively working with our meter reader provider who operates their own long term no access / high priority read process in parallel to retailer's efforts. We will start to utilise this additional provider process to increase our attainment levels.</p>		Ongoing	

Historical estimates and forward estimates	
Non-compliance	Description
<p>Audit Ref: 12.10</p> <p>With: Clause 3</p> <p>Schedule 15.3</p> <p>From: 01-Sep-19</p> <p>To: 22-Jul-20</p>	<p>CTCS and CTCX</p> <p>Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate.</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 recorded as moderate because historic and forward estimate is correctly identified most of the time.</p> <p>There is no impact on settlement because the calculation is correct; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The systems issue that causes this is being addressed, we are looking to have this issue resolved by 30 November 2020.		30/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per above.			

Forward estimate accuracy			
Non-compliance	Description		
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: Feb-Apr 19 and Nov-Dec 19</p>	<p>CTCT</p> <p>Inaccurate FE caused the thresholds not to be met in some instances.</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	Controls are rated as strong, as they are sufficient to ensure compliance to an acceptable level. Initial data is replaced with revised data and washed up.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Contact has implemented an improvement to its initial estimation process for newly acquired ICPs by using the daily average KWH value provided in the CS file as the basis of our estimation until there are sufficient reads obtained by Contact to provide as sufficient source of information to use for estimation.</p> <p>We are continuing to work with our non AMI meter reading provider to improve read attainment and to also targeting the long term no access properties</p>		Ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We are continuing to work with our non AMI meter reading provider to improve read attainment and to also targeting the long term no access properties	Ongoing	

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: Nov 18-Jan 19 (r14), Jun-Aug 19 (r7) and Oct-Dec 19 (r3)</p>	<p>CTCT</p> <p>Historic estimate thresholds were not met for some revisions.</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 because in most cases the thresholds were met, and processes have improved during the audit.</p> <p>The audit risk rating is low, because Contact were reasonably close to the target in all cases.</p>	
Actions taken to resolve the issue		Remedial action status
<p>Contact's overall submission accuracy is very good and where we have not been able to meet the accuracy thresholds the market impact is very low based on the consumption volumes involved. It is pleasing to see that our efforts to improve our HE performance has now been assessed as strong controls.</p> <p>We recognise that the change in meter reading provider has impacted our Historic Estimate performance, however we have continued to progress other improvements in order to achieve compliance:</p> <ul style="list-style-type: none"> • Taking AMI reading services from 2 additional MEPS meaning we now consume AMI reads from 7 MEPS • Applying a Permanent Estimate read type as part of status change where no actual read was obtained as part of a disconnection / reconnection. • Moving business customers with communicating AMI meters to month end read or near month end reading cycles. <p>We continue to work with our non AMI meter reading provider to improve read attainment and to also targeting the long term no access properties</p>		<p>Ongoing</p> <p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Contact is moving business customers that have communicating AMI meters to a target read date as close to month end as possible. Business load is quite sensitive to public holidays and in terms of irrigation – seasonal conditions, and our estimation routines struggle to recognise these periods. We expect this change will result in an improvement in our submission accuracy of between 0.5 and 1%.</p>	Ongoing	