

Compliance plan for For Our Good – 2020

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 01-May-19 To: 30-Apr-20	Some late status updates. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Corrected as soon as discovered, Process updated to ensure additional checks are completed with sites switching in that are in-active, and that reconnection notification is provided in a timely manner		20/05/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Process has been updated, plus a Report has been put in place that identifies any ICP's that have consumption to capture in-active with consumption.		20/05/2020
		Identified

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 24-Oct-19</p> <p>To: 28-Mar-20</p>	<p>Incorrect response code in 11 AN files.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they have recently been improved to ensure correct codes are used.</p> <p>There is no impact on other parties because this field in the AN file is seldom used. The registry data is more relevant and is used by most traders. The audit risk rating is recorded as low.</p>	
Actions taken to resolve the issue		Completion date
Additional Training given and process documentation for manual AN files has been updated to ensure rules for Response codes is clear		21/05/2020
Preventative actions taken to ensure no further issues will occur		Completion date
AN files automated where possible, plus improved process for manual AN's when these are required		21/05/2020
		Identified

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 17-Mar-20 To: 17-Mar-20	One CS file where actual reads were recorded as estimates. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because CS content is now automated. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Reads were Actual, only flagged as Estimated, Process updated for Manual CS (on Registry) to ensure additional checks are performed prior to committing CS, including the read type and utilizing the same calculation method for average consumption as the system uses (Read to Read)		20/05/2020
Preventative actions taken to ensure no further issues will occur		Completion date
System generated CS files is the primary form of CS file, only Manual in complicated switches. Process Changes ensures additional checks to ensure correct read type, average is calculated as per system rules and other values are correct before committing		21/05/2020
		Identified

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 02-Oct-19</p> <p>To: 18-May-20</p>	<p>FOGY as the gaining trader did not use the losing trader's switch event meter reading.</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 because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>As a HHR retailer FOGY goes to considerable effort to ensure the correct read is used for the switch, therefore requiring a larger number of RR's than would be expected for a non HHR retailer.</p> <p>FOGY Continue to dispute any reads that are rejected by losing traders</p> <p>RR's normally occur within a day or two (as soon as first HHR read arrives), this can be longer in cases of poor comms on meter that delays the delivery of data)</p>		21/05/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Working with MEP to endeavour to get a read within the 5 days and put follow-up processes in place if not received in time.</p> <p>Delayed Read delivery (poor comms with AMI meter) will mean that late reads will continue, and FOGY will continue to dispute any rejections that are legitimate</p>		30/06/2020
		Identified

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: 10(1) Schedule 11.3</p> <p>From: 24-Feb-20</p> <p>To: 04-Mar-20</p>	<p>Early event date determined for one ICP.</p> <p>11 incorrect response codes</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 because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Additional Training given and process documentation for manual AN files has been updated to ensure rules for Response codes is clear. Agreement of different dates than original Request has also resulted in a change in process to Withdraw and request for corrected agreed date		30/05/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AN files automated where possible, plus improved process for manual AN's when these are required, date issues will now be resolved with NW and re-requests for corrected agreed date		30/05/2020	

Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 24-Jan-20</p> <p>To: 24-Jan-20</p>	<p>Incorrect daily kWh 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Was result of a Manual CS file - Process updated for Manual CS (on Registry) to ensure additional checks are performed prior to committing CS, including the read type and utilizing the same calculation method for average consumption as the system uses (Read to Read)		20/05/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Process updated for Manual CS (on Registry) to ensure additional checks are performed prior to committing CS, including the read type and utilizing the same calculation method for average consumption as the system uses (Read to Read)		20/05/2020
		Cleared