

Compliance plan for Flick Energy Limited 2020

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Nov-19</p> <p>To: 23-Oct-20</p>	<p>Some registry data is incorrect.</p> <p>Historic unmetered load is excluded from submissions.</p> <p>Inactive consumption is excluded from submissions where the status remains incorrect.</p> <p>Estimated volumes for some unread and HHY profile ICPs are excluded from submissions, until AMI readings, meter removal readings, or customer readings are received.</p> <p>Some ICPs which are assigned HHY profile have not met the terms of the profile, particularly the requirement to be upgraded within 16 weeks.</p> <p>IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date.</p> <p>Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly. The impact is assessed to be low, as updated data will be provided through the revision process.	
Actions taken to resolve the issue		Completion date
<p>Approval has now been gained from the Authority for an Engineered profile (HHU) to submit unmetered load. This will allow future submission of unmetered load to the reconciliation manager using a manual process through applying a flat load.</p> <p>The 8.6 units of historical unmetered load has been exempted from reconciliation by the authority as this does not meet the 14 months revision period.</p> <p>System enhancement to overcome a Telemetry constraint which does not allow estimation of data if no historical data is present has been added to our Tech prioritization list.</p> <p>We have put on hold on our smart upgrade process for new customers. This will significantly reduce the issue of not meeting the approved timeframe of 16 weeks for the HHY profile use. The</p>		Nov 2021
		Investigating

delays were mainly caused due to COVID-19 restrictions which meant contractors could not be sent to site to replace meters. IntelliHUB is looking into extending the timeframe for issuing their backdated data from 15 days to 30 days. They currently have a system constraint which does not allow this. AMS are in the process of displacing ARC meters, the issue of interval data being received as one decimal place should then be resolved. In the meantime, this issue has been raised with ARC.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All unmetered volumes are now going to be submitted through the HHU profile.</p> <p>A robust training has been completed on registry updates and HHY profile use.</p> <p>The registry update process and HHY profile use will be assessed and monitored through the monthly Field QA and quarterly internal audit.</p>	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10</p> <p>Schedule 11.1</p> <p>From: 20-Nov-19</p> <p>To: 28-Aug-20</p>	<p>38 late status updates to active status.</p> <p>Three late status updates to inactive status.</p> <p>36 late trader updates.</p> <p>38 late ANZSIC code updates for new connections or switch ins.</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 because they are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement.</p> <p>The risk is low as most updates were completed on time or soon after they were due unless they were backdated corrections.</p>	
Actions taken to resolve the issue		Remedial action status
The issue of late ANZSIC codes update through switch-ins cannot be resolved fully as this is dependent on customers advising of correct ANZSIC when signing up. The non-compliance is due to the backdated date used to correct registry records. If current		Identified

<p>date was used to update the ANZSIC code, then incorrect records will be reflected in the registry.</p> <p>Most of the late active status and trader updates were due to the inability to update registry status while an ICP was in Switch which needs to be resolved through the Switch Process review process by the authority.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A robust training has been completed on trader and status updates on 17/11/2020.</p> <p>The registry status and trader update process will be monitored and assessed through the monthly Field QA and quarterly internal audit.</p>	17/11/20	

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 02-Dec-19 To: 12-Mar-20</p>	<p>Two late status updates for new connections.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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, as the late updates were isolated and occurred early in the audit period. The risk is assessed to be low based on the number of late updates.</p>	
Actions taken to resolve the issue		Completion date
A robust training will be has completed on new connection updates on 17/11/20.		17/11/20
Preventative actions taken to ensure no further issues will occur		Completion date
The registry new connection status update is going to be monitored and assessed through the monthly Field QA and quarterly internal audits.		Ongoing
		Identified

ANZSIC codes			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 12-Aug-20</p> <p>To: 23-Oct-20</p>	<p>Five ICPs had incorrect ANZSIC codes applied and were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are strong because good validation is in place and a small number of exceptions were identified.</p> <p>There is no impact on other participants or settlement, but there is a minor impact on the Authority because this information is used for reporting.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Five ANZSIC code discrepancies identified through this audit has been resolved.		29/10/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We have expanded the ANZIC code validation as recommended above to include blank ANZSIC codes and metering category two or higher ICPs with residential ANZSIC codes. However, this will not fully resolve the ANZSIC code discrepancies as we are dependent on our customers advising us of the correct end use during sign up.</p> <p>ANZIC validation report will be run monthly to identify ANSZIC code discrepancies.</p>		Ongoing	

Management of "inactive" status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 26-Apr-20</p> <p>To: 18-Jul-20</p>	<p>ICP 0005203376RN946 had an incorrect disconnection date applied and was corrected during the audit.</p> <p>ICP 0005764238RNA97 has an incorrect disconnection date applied, but cannot be easily corrected because the ICP is now decommissioned.</p> <p>ICP 0007135066RN5C2 had an incorrect status reason applied and was corrected during the audit.</p> <p>ICP 0000017063TCB25 had an incorrect reconnection date applied and was corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p>

	Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed. There is a small impact because consumption during inactive periods is excluded from submissions.		
Actions taken to resolve the issue		Completion date	Remedial action status
All the issues raised above have been corrected except for 1 ICP (0005764238RNA97) which cannot be corrected as the ICP has been decommissioned.		22/10/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Refresher training has been provided to the team which included monitoring of the timeliness and accuracy of registry status updates. Registry updates process will be monitored through monthly Field QA and quarterly Field Internal Audits.		17/11/2020	

Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 05-Mar-20 To: 07-Aug-20	At least eight transfer CS files contained average daily kWh inconsistent with the requirements of the registry functional specification. At least one transfer CS file contained an incorrect last actual read date. At least three transfer CS files contained an incorrect switch event read type. 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	I saw evidence that accuracy has been improved by the automation of the switching process. Post automation only estimated daily consumption discrepancies were identified, and these were caused by Flick applying the average for the last 30 days instead of the last read to read period. The audit risk rating is low because the average daily kWh information provided is a usually a reasonable estimate of the ICP's consumption (apart from one ICP with a meter change where negative kWh was provided). The last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on

	submission. All switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact.	
Actions taken to resolve the issue	Completion date	Remedial action status
We apply the average for the last 30 days while calculating average consumption in the CS file instead of the last read to read period as we gain actual reads daily. We would not reflect the true estimated value for the average consumption if we followed the rules stated in the registry functional specification v22.21 A robust refresher training on the CS file submission data which included event dates, read types, read and average daily consumption has been completed on 17/11/2020.	17/11/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The submission of the CS file contents will be assessed and monitored through the scheduled monthly Switch QA and quarterly Switch internal audits.	Ongoing	

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: 16-Mar-20</p> <p>To: 08-Jul-20</p>	<p>One late RR file.</p> <p>Switch event readings for 0000018280CE85E (29/05/2020) and 0000608649HB27C (08/07/2020) were recorded as actual in Telemetry but should have been estimates.</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, because:</p> <ul style="list-style-type: none"> most RR and AC files were issued on time, and the delays were caused by waiting for metering information, and the manual process to update Telemetry where an RR is rejected normally ensures that the correct read type is applied. <p>The impact is low because the read type differences have no impact on submission, and the late files have a minor impact on other participants.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The read type for both ICP's mentioned above has been corrected in Telemetry.	18/11/2020	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Training has been provided to the team on the RR process. RR process will be monitored through monthly Field QA and quarterly Field Internal Audits.	17/11/2020	

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: 29-Jan-20 To: 29-Jan-20	An incorrect switch event reading was provided in the RR file for 0005045312RN131's (29/01/20). 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 have improved during the audit period with process automation. A calculation error was made when creating this manual RR file before the process was automated. There is no impact apart from the inconvenience of processing an unnecessary RR file for the other trader. The agreed switch event reading was applied in Telemetry.		
Actions taken to resolve the issue		Completion date	Remedial action status
No correction is required in this instance as the incorrect switch event reading in the RR file was rejected by the losing retailer.		26/10/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A robust training on the RR process was held on 17/11/2020. The RR process is going to be monitored through monthly Switch QA and quarterly Switch Internal audit.		Ongoing	

Losing trader provides information - switch move	
Non-compliance	Description
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 03-Jan-20 To: 13-Jan-20	One late switch move CS file. 65 AN files has non-compliant proposed event dates. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong

	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are strong:</p> <ul style="list-style-type: none"> one late file was identified, and it was processed one day late due to reduced staffing over the Christmas/New Year holiday period, and the non-compliant AN event dates were identified through Flick's internal audit and switching team quality assurance processes; the criteria were corrected the system and the issues have not recurred. <p>The impact is assessed to be low because the switches were completed as expected, and the late file was one business day late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Non-compliance related to the 65 AN files issued with incorrect proposed event dates were due to a system error. This was fixed immediately after this error was identified through a Switch Internal audit.		31/3/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The AN and switch event dates are going to be monitored through monthly Switch QA and quarterly Switch internal audits. Robust refresher training was held on 17/11/20 on the switch processes.		Ongoing	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11</p> <p>Schedule 11.3</p> <p>From: 22-Oct-19</p> <p>To: 24-Jul-20</p>	<p>At least two CS files contained average daily kWh inconsistent with the requirements of the registry functional specification.</p> <p>At least three switch move CS files contained an incorrect last actual read dates.</p> <p>At least four switch move CS files contained an incorrect switch event read type.</p> <p>At least one switch move CS file contained an incorrect switch event reading.</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	I saw evidence that accuracy has been improved by the automation of the switching process. Post automation only estimated daily consumption discrepancies were identified (within the transfer switch sample), and these were caused by Flick applying the average for the last 30 days instead of the last read to read period.

The audit risk rating is low because the average daily kWh information provided is a reasonable estimate of the ICP's consumption. The last actual read date field is used to help assess the accuracy of any estimates provide and has no impact on submission. All switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact.		
Actions taken to resolve the issue	Completion date	Remedial action status
Robust training was held on 17/11/2020 for the Switching which included switching timeframes, event dates and accuracy of CS file contents.	17/11/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The accuracy of CS file contents, switching timeframes and event dates is going to be monitored through monthly Switch QA and quarterly Switch Internal Audit.	Ongoing	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11 With: Clause 12 of Schedule 11.3</p> <p>From: 04-Mar-20 To: 31-Jul-20</p>	<p>Four late RR files for switch moves.</p> <p>Switch event readings for 0000509929CE98C (01/07/20) and 0001412478UN109 (07/03/20) were recorded as actual in Telemetry but should have been estimates.</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate, because:</p> <ul style="list-style-type: none"> most RR and AC files were issued on time, and the delays were caused by waiting for metering information, and the manual process to update Telemetry where an RR is rejected normally ensures that the correct read type is applied. <p>The impact is low because the read type differences have no impact on submission, and the late files have a minor impact on other participants.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The read type for Switch event readings for 0000509929CE98C (01/07/20) and 0001412478UN109 has been corrected in Telemetry.</p> <p>Robust training was held on the RR processes on 17/11/20.</p>	17/11/2020	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
The RR process is going to be monitored through monthly Switch QA and quarterly Switch internal audits.	Ongoing	

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: 06-Jan-20</p> <p>To: 16-Jul-20</p>	<p>Six switch withdrawal requests were issued more than two months from the event date.</p> <p>Two NW files contained incorrect withdrawal codes.</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 moderate because the files are processed manually. The incorrect withdrawal codes were manually selected, and the late files were delayed while Flick confirmed that the NWs were required.</p> <p>The audit risk rating is low because a small number of files were affected.</p>	
Actions taken to resolve the issue		Completion date
<p>The 2-month timeframe allowed for the switch withdrawals is not reasonable and does not meet customer requirements in some instances.</p> <p>We action withdrawal requests as soon as we are made aware of an incorrect sign up or a need for a switch withdrawal.</p>		17/11/20
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Refresher training was provided on 17/11/20 to the Switch team on the use of correct withdrawal codes.</p> <p>The use of correct withdrawal codes will be monitored and assessed through the monthly switch QA and quarterly Switch internal audits.</p>		Ongoing
		Identified

Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 29-Oct-20</p> <p>To: 29-Oct-20</p>	<p>For one transfer CS file issued by Flick, the switch event readings did not reflect the actual reading or estimated 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	Controls are rated as strong. CS processes have been automated during the audit period, and no issues were identified for CS files generated by the system. The audit risk rating is low, based on the kWh difference.	
Actions taken to resolve the issue		Completion date
Training was provided to the switch team on calculation of estimated reads for the submission of read in the CS file.		17/11/2020
Preventative actions taken to ensure no further issues will occur		Completion date
CS file read accuracy will be monitored through monthly Switch QA and quarterly Switch internal audits.		Ongoing
Remedial action status		
Identified		

Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 11.14</p> <p>From: 13-Mar-17</p> <p>To: 23-Oct-20</p>	<p>No unmetered volumes were reported for four ICPs with unmetered load for a short period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, as they prevent shared unmetered ICPs from switching in, and promptly identify added shared unmetered load so that appropriate action can be taken. The impact is low and resulted in under reporting by 8.65 kWh.	

Actions taken to resolve the issue	Completion date	Remedial action status
Approval has now been gained from the Authority for an Engineered profile (HHU) to submit unmetered load. This will allow future submission of unmetered load to the reconciliation manager using a manual process through applying a flat load. The 8.6 units of historical unmetered load has been exempted from reconciliation by the authority as this does not meet the 14 months revision period.	13/11/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will ensure that any future unmetered load identified through the Safety net is submitted to the reconciliation manager through the approved HHU profile.	Ongoing	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13 and clause 15.2</p> <p>From: 20-Nov-19</p> <p>To: 15-Jul-20</p>	<p>Eight bridged meters were identified during the audit period. Energy was not quantified in accordance with the code during the bridged periods.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time. 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 to estimate consumption during bridged periods.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Corrections were processed for all eight bridged meters and energy was quantified in accordance with the code during the bridged periods.	Nov 2019 – Nov 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bridging of meters cannot be prevented as this is usually done to provide customers urgent electricity after hours to avoid health and safety risk to them. We ensure that correction is done to quantify energy during the bridged period in accordance with the code.	Ongoing	

Derivation of meter readings			
Non-compliance	Description		
Audit Ref: 6.6 With: Clause 3(2) Schedule 15.2 From: 03-Dec-19 To: 12-Sep-20	Three customer photo readings were recorded as actual readings in CS files. 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 rated as strong. Customer photo readings taken on Flick's last day of supply have consistently been recorded as actual readings due to a misunderstanding. Customer readings taken on other days are used to estimate the switch event reading. The impact on settlement and participants is minor, because all switch event readings are treated as actual or permanent estimate by the reconciliation process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Refresher training on the classification of read type for photo reads was held on 17/11/2020.		17/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Classification of read type for photo reads will be monitored through monthly switch QA and quarterly internal audits.		Ongoing	

NHH meter reading application			
Non-compliance	Description		
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 22-Oct-19 To: 22-Oct-19	One CS file contained a switch event reading which did not relate to the end of Flick's last day of supply, and was not a reasonable estimate of consumption on the last day of supply. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I saw evidence that accuracy has been improved by the automation of the switching process. 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
Training was provided to switch team on estimation of reads for the CS file.	17/11/20	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Accuracy of the CS file read will be monitored through monthly Switch QA and quarterly Switch internal audits.	Ongoing	

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 8(1) and (2) of Schedule 15.2 From: 01-Jan-20 To: 23-Oct-20	Meter reading frequency reports have not been provided to the market administrator for NHH ICPs continuously supplied for four months or more. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are weak because no reports have been provided. The impact is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
An attempt will be made to provide meter reading frequency report for the impacted ICPs to the market administrator.	31/1/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The timeframes for the HHY profile will be monitored through the Field QA and Switch internal audit. If in an exceptional case an HHY profile exceeds the 4-month period a meter reading frequency report will be provided to the market administrator.	Ongoing	

Identification of readings	
Non-compliance	Description
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2	Unvalidated actual HHR data is classified as estimated. Seven CS files contained switch event readings which were incorrectly classified as actual readings. Telemetry classified estimated switch event readings for four ICPs as actual instead of estimate. Potential impact: Low

From: 01-Dec-19 To: 23-Oct-20	Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate overall because they mitigate risk most of the time but there is room for improvement.</p> <p>Controls over CS files have improved during the audit period, and I saw evidence that accuracy was improved by the automation of the switching process.</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
Training was provided to switch team on the estimation and accuracy of the read and read type in the CS and RR file.	17/11/20	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Accuracy of read and read type in the CS and RR file will be monitored through monthly Switch QA and quarterly Switch internal audits.	Ongoing	

Half hour estimates	
Non-compliance	Description
<p>Audit Ref: 9.4</p> <p>With: Clause 15</p> <p>Schedule 15.2</p> <p>From: 01-Mar-20</p> <p>To: 12-Aug-20</p>	<p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate.</p> <p>Flick did not meet the reasonable endeavours requirements for at least nine ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are moderate, estimates are created except where there is insufficient history for Telemetry to produce estimates.</p> <p>The impact is assessed to be low, as updated data will be provided through the revision process.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Due to a system constraint read estimates cannot be generated without a read history in Telemetry. A system enhancement has been recommended to overcome this issue.	2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
System enhancement to overcome the Telemetry constraint which does not allow estimation of data if no historical data is present has been added to our Tech prioritization list.	2021	

Calculation of ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2 With: Clause 15.6</p> <p>From: 01-Dec-18 To: 23-Oct-20</p>	<p>ICP days are not provided for trading periods which do not have estimated or actual data.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as they are sufficient to ensure that most data is correctly reported unless actual or estimated data is unavailable. Estimates are created except where there is insufficient history for Telemetry to produce estimates.</p> <p>The impact is assessed to be low, as updated data will be provided through the revision process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
This relates to the issue raised on page 106 and will be resolved once Telemetry Enhancement is completed which would allow estimates to be created without a read history. This will ensure timely reporting of ICP days.	2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
System enhancement to overcome the Telemetry constraint which does not allow estimation of data if no historical data is present has been added to our Tech prioritization list. This will ensure timely reporting of ICP days.	2021	

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Nov-19</p> <p>To: 23-Oct-20</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p>HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate.</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 moderate, estimates are created except where there is insufficient history for Telemetry to produce estimates. The impact is assessed to be low, as updated data will be provided through the revision process.</p> <p>The issue relating to content of the aggregates file is an error in the code, Flick is providing submission information as expected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This relates to the issue already raised through page 106 and 114 and will be resolved once Telemetry is enhanced to allow estimates to be created without a read history.		2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
System enhancement to overcome the Telemetry constraint which does not allow estimation of data if no historical data is present has been added to our Tech prioritization list.		2021	

Creation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p>	<p>Historic unmetered load is excluded from submissions.</p> <p>Inactive consumption is excluded from submissions where the status remains incorrect.</p> <p>Estimated volumes for some unread and HHY profile ICPs are excluded from submissions, until AMI readings, meter removal readings, or customer readings are received.</p> <p>IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p>

From: 01-Nov-19 To: 23-Oct-20	Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly. The impact is assessed to be low, as updated data will be provided through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Application to the Authority for an Engineered profile (HHU) to submit unmetered load has now been approved. This will allow future submission of unmetered load to the reconciliation manager using a manual process through applying a flat load. The 8.6 units of historical unmetered load has been exempted from reconciliation by the authority as this does not meet the 14 months revision period. Estimated volumes for the HHY profiles has been submitted through the revision files.		13/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All unmetered volumes are now going to be submitted through the HHU profile. System enhancement to overcome a Telemetry constraint which does not allow estimation of data if no historical data is present has been added to our Tech prioritization list. We have put on hold on switching in NHH ICPs unless it relates to a current customer. This will significantly reduce the issue of not meeting the approved timeframe of 16 weeks for the HHY profile use. The delays were mainly caused due to COVID-19 restrictions which meant contractors could not be sent to site to replace meters. IntelliHUB is looking into extending the timeframe for issuing their backdated data from 15 days to 30 days. They currently have a system constraint which does not allow this.		Ongoing	

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Nov-19</p> <p>To: 23-Oct-20</p>	<p>Historic unmetered load is excluded from submissions.</p> <p>Inactive consumption is excluded from submissions where the status remains incorrect.</p> <p>Estimated volumes for some unread and HHY profile ICPs are excluded from submissions, until AMI readings, meter removal readings, or customer readings are received.</p> <p>Some ICPs which are assigned HHY profile have not met the terms of the profile, particularly the requirement to be upgraded within 16 weeks.</p> <p>IntelliHUB does not provide updated actual data to replace estimates if the actual data is obtained more than 15 days after the event date.</p> <p>Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly. The impact is assessed to be low, as updated data will be provided through the revision process.</p>	
Actions taken to resolve the issue		Completion date
<p>Application to the Authority for an Engineered profile (HHU) to submit unmetered load has now been approved. This will allow future submission of unmetered load to the reconciliation manager using a manual process through applying a flat load. The 8.6 units of historical unmetered load has been exempted from reconciliation by the authority as this does not meet the 14 months revision period.</p> <p>System enhancement to overcome a Telemetry constraint which does not allow estimation of data if no historical data is present has been added to our Tech prioritization list.</p> <p>We have put on hold on switching in NHH ICPs unless it relates to a current customer. This will significantly reduce the issue of not meeting the approved timeframe of 16 weeks for the HHY profile use. The delays were mainly caused due to COVID-19 restrictions which meant contractors could not be sent to site to replace meters.</p> <p>IntelliHUB is looking into extending the timeframe for issuing their backdated data from 15 days to 30 days. They currently have a system constraint which does not allow this.</p>		<p>Nov 2021</p>
		Identified

AMS are in the process of displacing ARC meters, the issue of interval data being received as one decimal place should then be resolved. In the meantime, this issue has been raised with ARC.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All unmetered volumes are now going to be submitted through the HHU profile.</p> <p>A robust training has been completed on registry updates.</p> <p>The assessment of the registry update process will be monitored through the monthly Field QA.</p>	ongoing	