

Compliance plan for Pioneer Energy (Jan 2020)

Title: Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-May-19</p> <p>To: 10-Jan-20</p>	<p>The registry validation is not sufficient to identify all discrepancies between Orion and the registry, including discrepancies which could impact on the accuracy of reconciliation submissions.</p> <p>Nine ICPs had incorrect statuses or status event dates recorded on the registry.</p> <p>Three ICPs had incorrect profiles recorded on the registry, but correct profiles were applied for submission.</p> <p>Two ICPs had incorrect unmetered load recorded in Orion.</p> <p>Two trader updates had incorrect event dates applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they are sufficient to ensure that data is recorded correctly most of the time. The current validation processes are focussed on data which had changed.</p> <p>The impact on submission is minimal and will wash out when the records are corrected.</p> <ul style="list-style-type: none"> For the event date discrepancies, a small number of exceptions were identified and the difference between the applied dates and correct dates was small. The unmetered load volumes differences are low. The correct profiles were applied for reconciliation for the ICPs with profile discrepancies. The impact of the trader event date updates is low. 	
Actions taken to resolve the issue		Completion date
a) Event Dates – checked paperwork and corrected in Orion and the Registry		28.01.2020
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>a) New process to be implemented to validate information between Orion and the registry on a monthly basis for any discrepancies. This will cover the event date discrepancies and unmetered loads.</p> <p>b) Also on UML we will contact the customer directly with what the UML consists of and verify this matches what is in the registry</p> <p>c) Added to our existing google.doc, a section for managing new connections</p>	28.01.2020	

Title: Electrical Connection of Point of Connection	
Non-compliance	Description
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 26-Apr-18</p> <p>To: 10-Jan-20</p>	<p>Three metered ICPs did not have meter certification provided within five business days of the change to active status.</p> <p>One new ICP was allegedly livened by Pioneer without WEL Network's approval. An alleged breach has been raised by WEL Networks (1910PION3) and is currently being investigated.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as strong, because:</p> <ul style="list-style-type: none"> meter certification is an MEP responsibility and Pioneer sometimes cannot achieve compliance; and Pioneer did not ask their contractor to complete a connection for an ICP without the network's approval, the connection was completed to a different transformer without their authorisation or knowledge. <p>The impact is assessed to be low because:</p> <ul style="list-style-type: none"> A small number of meters were not certified within the timeframes and all were certified at a later date. Uncertified metering installations are likely to be less accurate than certified metering installations, so there could be a minor impact on settlement. The audit risk rating is recorded as low because the number and proportion of connections affected is low. The impact of breach 1910PION3 is currently being assessed by the Authority. The issues associated with this connection have now been resolved.

Actions taken to resolve the issue	Completion date	Remedial action status
The breach is still under investigation.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to follow up with MEP's within the required timeframe to ensure compliance.	28.01.20	

Title: Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 09-May-19 To: 30-Nov-19</p>	<p>57 late status updates to active.</p> <p>Seven late status updates to inactive</p> <p>Seven late trader updates.</p> <p>One late ANZSIC code update.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. I found late updates often related to data corrections, which improved overall data accuracy, with a smaller proportion caused by delays in receiving information to confirm the update attributes or delays in processing the updates.</p> <p>The risk is low as most updates were completed on time or soon after they were due, or related to corrections.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue to correct any inaccuracies to make sure data in the registry to correct	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Our new report between Orion and the registry should capture the discrepancies going forward</p> <p>Carry out in house audit for all Torrens Tce ICPS still with PION</p>	TBC	

Title: Provision of information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 29-Apr-19 To: 25-Nov-19	Eight late status updates to active for new connections. ICPs 0000508872CE7F4, 0000509962CE5FD and 0000509722CE153 have incorrect new connection active status event dates applied. Potential impact: Low Actual impact: Low 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 the registry is updated on time most of the time, and that active dates are accurately recorded. The risk rating is low. The late updates were all made within 22 business days of the active date, and the date discrepancies were small. The impact on submission is minimal and will wash out when the records are corrected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected in Registry and checked in Orion		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New google.com connections s/sheet in place		28.01.2020	

Title: ANZSIC codes	
Non-compliance	Description
Audit Ref: 3.6 With: Clause 9 (1(k)) of Schedule 11.1 From: 29-Nov-19 To: 10-Jan-20	Incorrect ANZSIC codes were applied for six ICPs, and were corrected during the audit. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>There are preventative controls in place to ensure that ANZSIC codes are initially recorded accurately, and monitoring controls are periodically used to check and correct ANZSIC codes. Because six (12%) of the sample of 49 ICPs individually checked were found to be incorrect, I have rated the controls as moderate.</p> <p>The audit risk rating is low, because this has no direct impact on submission accuracy and the incorrect codes have been corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected		17.01.2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Added to Promapp process for switching in, if unsure of ANZSIC code we will contact the customer to confirm type of business at the site		28.01.2020	

Title: 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: 29-Nov-19</p> <p>To: 10-Jan-20</p>	<p>Incorrect unmetered load is recorded in Orion for 0000794436NV646, 0000075272CE0B4, and 0000479017CEA33.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be weak, because the Orion daily unmetered kWh is not regularly validated against the registry.</p> <p>The impact is assessed to be low based on the kWh differences.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Checking and updating		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New process to be implemented to validate information between Orion and the registry on a monthly basis for any discrepancies.		28.01.2020	

Title: Management of “active” status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 29-Apr-19</p> <p>To: 25-Nov-19</p>	<p>ICPs 0000406213WPA35 and 0000007765TED75 have incorrect reconnection status event dates applied.</p> <p>ICPs 0000508872CE7F4, 0000509962CE5FD and 0000509722CE153 have incorrect new connection active status event dates applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>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.</p> <p>The impact is low, because a small number of exceptions were identified and the difference between the applied dates and correct dates was small. The impact on submission is minimal and will wash out when the records are corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Checked and corrected in Registry and Orion		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A new process will be created to validate information between Orion and the registry on a monthly basis for any discrepancies.</p> <p>Checking with Agility to see if any of our reports from Orion can assist in this validation.</p>		TBC	

Title: Management of “inactive” status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 04-May-19</p> <p>To: 07-May-19</p>	<p>ICP 0000003526CE9CD has an incorrect disconnection date applied.</p> <p>Three ICPs incorrectly had “inactive reconciled elsewhere” status recorded on the registry and were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>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.</p> <p>The impact is low. Three exceptions have been corrected, and the incorrect date difference was three days. The correct status event date is after the applied event date, so no active consumption or ICP days will be omitted from reconciliation submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Noted		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff trained		28.01.2020	

Title: Inform registry of switch request for ICPs - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.1</p> <p>With: Clause 2 Schedule 11.3</p> <p>From: 4-Jul-19</p> <p>To: 20-Nov-19</p>	<p>Transfer switches were requested for ICPs 0000021975CEB84, 0000508488CE97E, and 0004557770TC6E7 when the customer had confirmed that they were moving into the address.</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 detailed information on the switch type to be applied is not consistently provided to the Customer Service and Billing Analyst, who requests the switch.</p> <p>The impact is assessed to be low, because there was a minimal impact for the customer, other trader and the Authority who use the switch type in their statistics.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Noted		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication with the customer and account managers		28.01.2020	

Title: 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: 19-Jul-19</p> <p>To: 10-Oct-19</p>	<p>The "CO" AN response code was incorrectly applied for 0000001636DED38 and 0000492001CE38C.</p> <p>The "OC" AN response code was incorrectly applied for 0000030576DEC12.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong, because both preventative and detective controls are in place for AN codes. It appears that Orion's logic bases the AN code on current values at the time the NT is received, rather than the values that apply on the requested event date. This can result in incorrect AN response codes being applied where a customer is about to move out, or a contract is about to expire.</p> <p>The manual monitoring controls did not operate as intended because new staff were undergoing training. Now that training is complete controls are expected to be strong.</p> <p>The impact is assessed to be low, because the switches were completed as expected.</p>	
Actions taken to resolve the issue		Completion date
Staff learning and aware and will need to double check this		28.01.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Checked at time of sending file		28.01.2020
		Identified

Title: Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 09-May-19</p> <p>To: 04-Nov-19</p>	<p>At least 12 CS average daily consumption values were not consistent with the average consumption for the last read to read period in transfer CS files, because the Orion EDC is applied instead of consumption for the last read to read period.</p> <p>Eight transfer CS files contained some incorrect read, read type and/or last actual read information.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 process does not ensure that estimated daily kWh relates to previous read to read period, and that CS content was consistently correct.</p> <p>The audit risk rating is low because the average daily kWh information provided reflects the EDC on the meters tab at the time the switch was completed. Further training has been provided and the incorrect data caused by manual edits of the CS files is unlikely to recur. The event read differences are small.</p>	
Actions taken to resolve the issue		Completion date
File checked at time of submitting		28.01.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing staff training		28.01.2020
		Identified

Title: 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: 19-Jul-19</p> <p>To: 04-Nov-19</p>	<p>For ICP 0000001074ED314 an incorrect read type was applied in Orion. Estimate was used instead of actual.</p> <p>For ICPs 0000483126CE356 and 0000500468CEEC4. RR files issued by other traders were invalidly rejected. This occurred because the read in the original CS file had been amended and did not match Orion.</p> <p>For ICPs 0000508237CE214 and 0000509672CE05F Orion did not reflect the outcome of the RR process.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate, because they are adequate but temporarily did not operate as intended while new staff were in training.</p> <p>The audit risk rating is low because further training has been provided and the incorrect data caused by manual edits of the CS files or incorrectly processed RR files are unlikely to recur. The event read differences are small.</p>	
Actions taken to resolve the issue		Completion date
Now corrected as we are now aware of the read validation process		28.01.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Training given on definition of an 'actual' read		28.01.2020
Remedial action status		
Identified		

Title: Losing trader provides information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clauses 10(1) Schedule 11.3</p> <p>From: 12-Sep-19</p> <p>To: 20-Sep-19</p>	<p>One late MI CS file.</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. The manual controls did not operate as intended because new staff were undergoing training. Now that training is complete controls are expected to be strong.</p> <p>The impact is assessed to be low, because the file was one business day late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Training up to date		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
More experience now in process		28.01.2020	

Title: 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: 09-May-19</p> <p>To: 01-Nov-19</p>	<p>At least ten CS average daily consumption values were not consistent with the average consumption for the last read to read period in transfer CS files, because the Orion EDC is applied instead of consumption for the last read to read period.</p> <p>Three CS files contained some incorrect read, read type and/or last actual read information.</p> <p>31 switch move CS files did not have CSMETERCHANNEL, CSMETERCOMP and CSMETERINSTALL lines supplied.</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>Controls are rated as weak, because the process does not ensure that estimated daily kWh relates to previous read to read period, and that CS content was consistently correct.</p> <p>The audit risk rating is low because the average daily kWh information provided reflects the EDC on the meters tab at the time the switch was completed. Further training has been provided and the incorrect data caused by manual edits of the CS files is unlikely to recur. The missing CS lines will be investigated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Noted		28.01.2020	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
N/a as we believe it is correct. The Registry should have rejected the files if they were not the correct format	28.01.2020	

Title: Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12</p> <p>Schedule 11.3</p> <p>From: 05-Jun-19</p> <p>To: 14-Nov-19</p>	<p>The RRs for ICPs 0110135020AP9D1 and 0000504770CE3FE used unvalidated customer reads as supporting readings, and a RR read type of "A" was incorrectly applied because a customer reading was received on the switch event date.</p> <p>ICP 0000491652CE3A2 did not have the agreed switch reading applied in Orion, because the difference was less than 50 kWh and Pioneer elected to use their own AMI read without informing the losing trader.</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>Controls are rated as moderate, because they are adequate but temporarily did not operate as intended while new staff were in training.</p> <p>The audit risk rating is low:</p> <ul style="list-style-type: none"> for ICPs 0110135020AP9D1 and 0000504770CE3FE Orion reflected the correct outcome of the RR process and it is likely that the customer provided reads will be accurate; and for ICP 0000491652CE3A2 the difference between the agreed and applied readings is less than 50 kWh. 	
Actions taken to resolve the issue		Completion date
Process updated and staff trained		28.01.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Process rolled out to all staff		28.01.2020
		Identified

Title: Losing trader provision of information - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.13 With: Clause 15 Schedule 11.3 From: 9-Sep-19 To: 25-Sep-19	One late HH AN file. Three HH AN files had an incorrect AN response code applied. 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 because both preventative and detective controls are in place for AN codes. In both instances the manual controls did not operate as intended because new staff were undergoing training. Now that training is complete controls are expected to be strong. The impact is assessed to be low: <ul style="list-style-type: none"> the incorrect AN codes had no impact, because the switches were completed as requested; and the late AN file delayed the CS file by three business days, but because the switch was completed by 10/09/19 there was no impact on reconciliation submissions, and minimal impact on the other retailer and customer. 		
Actions taken to resolve the issue		Completion date	Remedial action status
Aware of the issue and noted		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Noted and aware		28.01.2020	

Title: Gaining trader to advise the registry manager - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.14 With: Clause 16 Schedule 11.3 From: 9-Sep-19 To: 25-Sep-19	One late HH CS file. 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 rated as strong because both preventative and detective controls are in place for AN codes. The late file occurred because registry acknowledgement files were not reviewed at the time.</p> <p>The impact is assessed to be low; the switch was completed within 35 business days. Submission information was corrected through the revision process once the switch was complete.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Aware of the issue and noted		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Noted		28.01.2020	

Title: Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clause 17 and 18 Schedule 11.3</p> <p>From: 11-Nov-19</p> <p>To: 11-Nov-19</p>	<p>The NW for ICP 0000650410WPE9F was rejected in error.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong; this appears to be an isolated exception which occurred due to a data processing error.</p> <p>There is no impact, the switch was completed and the NW was not reissued.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Followed up with gaining retailer and corrected		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Following the process and checking with the customer		28.01.2020	

Title: Metering information			
Non-compliance	Description		
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 14-Oct-19 To: 14-Nov-19	For seven CS files issued by Pioneer, switch event reads did not reflect the actual reading or best estimate of an actual reading on the event date. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, because this was a temporary issue over a short period where monitoring controls were not operating as intended. Further training has been provided and this issue is not expected to recur. The audit risk rating is low. Further training has been provided and the incorrect data caused by manual edits of the CS files is unlikely to recur.		
Actions taken to resolve the issue		Completion date	Remedial action status
Now aware		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Manual checking between Orion and CS file and also the database (Billing Dashboard)		28.01.2020	

Title: Distributed unmetered load			
Non-compliance	Description		
Audit Ref: 5.4 With: Clause 11 Schedule 15.3, Clause 15.37B & 16A.26 From: 01-May-19 To: 10-Jan-20	The Grey and Gore DC DUMML databases are not accurate. Potential impact: Medium Actual impact: Unknown Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The effectiveness of the controls is recorded as moderate as Pioneer are working to resolve the issues found. The impact on settlement is medium because submission information is based on databases which contain some inaccurate information.		

Actions taken to resolve the issue	Completion date	Remedial action status
Audit date to be confirmed and will be in Feb.	TBC	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
From audit we will look at non-compliance issues and remedy.	28.01.2020	

Title: Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13 and Clause 15.13</p> <p>From: 30-Sep-18</p> <p>To: 10-Jan-20</p>	<p>Load for ICP 1002050361LC60D is determined by subtraction.</p> <p>ICPs 0000033279CE035, 0000101696DE14B, and 0000500005CE26E have submission against the RPS and PV1 profiles, but only RPS profile is recorded on the registry.</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>Incorrect design of the metering installation for ICP 1002050361LC60D would result in double submission of volumes, and Pioneer has implemented corrective controls to adjust the data prior to submission so that there is no impact on settlement. Until the MEP resolves the issue, Pioneer's process remains non-compliant but submitted volumes are correct.</p> <p>The incorrect profiles on the registry have no impact on settlement.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Working with ADHB to remedy metering onsite	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Title: Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-May-19</p> <p>To: 30-Oct-19</p>	<p>Photo readings are consistently entered as actual readings, including where they are not validated against a set of actual readings from another source. An unvalidated customer reading was entered with an actual read type for ICP 0000489139CE865 on 30/10/19.</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>Controls are rated as weak, because customer photo readings have consistently been treated as actual readings regardless of whether they were validated.</p> <p>The audit risk rating is low. The incorrectly classified photo reading could have a minor impact on submission if it was found to be incorrect.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Now aware		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All staff trained		28.01.2020	

Title: NHH meter reading application			
Non-compliance	Description		
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 09-May-19</p> <p>To: 01-Nov-19</p>	<p>Some switch event readings did not relate to 11.59pm on Pioneer's last day of responsibility.</p> <p>NHH meter readings applied to the end of the day before the meter change for NHH to HHR changes.</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
Working with Agility to see if we can change Orion to reflect this		TBC	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Nil at present		28.01.2020	

Title: 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>From: 01-Jun-19</p> <p>To: 31-Oct-19</p>	<p>The meter reading frequency report contains some incorrect information.</p> <ul style="list-style-type: none"> The 4-month values include ICPs which have been unread for three months or more as unread. 12-month values include ICPs which have been unread for four months or more. There was only one genuine ICP which was unread for 12 months or more. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls over the meter reading frequency report are rated as weak, because they do not ensure that the report information is accurate.</p> <p>The audit risk rating is low, because the report includes additional ICPs, but no ICPs appear to be invalidly excluded.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Report out of Dashboard is just for chasing unread meters and is for our staff to assist them to timely meter reads. It does not correlate with the MR Frequency report sent to EA.		28.01.2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Dispute breach rating score. The MR Frequency report is checked and any unread meters followed up on as per process above, EA is advised of any issues. (1 over 12 months – meter ripped out)		28.01.2020	

Title: NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Jun-19 To: 31-Oct-19	ICP 0000044886WEB7A was unread for more than four months and was connected to an NSP where compliance with Clause 9(1) Schedule 15.2 was not achieved, and the best endeavours requirement was not met. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls over read attainment are strong, because the ICP was being monitored and the requirements were met for all other ICPs checked. The audit risk rating is low, because a read was obtained for the ICP.		
Actions taken to resolve the issue		Completion date	Remedial action status
Noted and billed as temp supply		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aware of process		28.01.2020	

Title: Identification of readings			
Non-compliance	Description		
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 14-Jun-19 To: 14-Nov-19	For eight RR and CS files issued by Pioneer, switch event reads were recorded with an incorrect read type. Photo readings are consistently entered as actual readings, including where they are not validated against a set of actual readings from another source. An unvalidated customer reading was entered with an actual read type for ICP 0000489139CE865 on 30/10/19. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak, because customer photo readings have consistently been treated as actual readings regardless of whether they were validated. All the incorrect read types were the result of data processing errors when new staff were undergoing training, or a misunderstanding about how customer reads were to be treated.</p> <p>The audit risk rating is low. All the switch event reads are treated as actual or permanent estimate readings in Orion, so there is no impact on submission. The incorrectly classified photo reading could have a minor impact on submission if it was found to be incorrect.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Process updated		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training provided. Dispute the rating as Orion has validation process in place.		28.01.2020	

Title: Calculation of ICP days			
Non-compliance	Description		
Audit Ref: 11.2 With: Clause 15.6 From: Jan-19 to Mar-19 R7	<p>The AV110 report excludes ICPs from revision submissions for periods where they were active if the ICP's current status is decommissioned.</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 rated as weak, because they do not ensure that ICP days are reported for all active periods where an ICP is later decommissioned.</p> <p>The impact is assessed to be low; Pioneer has 52 decommissioned ICPs which is an increase from five ICPs at the time of the last audit.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Aware of the 'Decommissioned' issue, with Agility to fix in Orion. Manually updated on report in the meantime.		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting will be corrected to pick up these sites. Job with Agility Job NO 881.		28.01.2020	

Title: HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.4 With: Clause 15.8 From: 01-Aug-18 To: 31-Oct-19	HHR aggregates file does not contain electricity supplied information. An incorrect version of the volumes file was submitted for the September 2019 initial submission. Corrected data was washed up for revision 1. 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 issue relating to content of the aggregates file is an error in the code, Pioneer is providing submission information as expected. Controls are in place to detect submission data errors, but failed in one instance. Correct submission data was provided for the next revision.		
Actions taken to resolve the issue		Completion date	Remedial action status
Training given		28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Promapp updated and aware of reports to check		28.01.2020	

Title: Creation of submission information			
Non-compliance	Description		
Audit Ref: 12.2 With: Clause 15.4 From: 17-Apr-19 To: 17-Apr-19	Breach 1910PION1 recorded that some reconciliation submission information was provided five minutes late. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong because reconciliation submissions are almost always provided on time, and the submission was five minutes late. The impact is assessed to be low, because there was no impact.		

Title: Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 of Schedule 15.2 From: Jul-18, Aug-18 and Sep-18 r14	Some estimates were not replaced by revision 14. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they were sufficient to ensure that most NSPs had 100% historic estimate by revision 14, but there was room for improvement. The impact is low. Total forward estimate for the three months reviewed was 18,505.67 kWh. Some of this relates to unmetered load which is true historic estimate, but is incorrectly classified, and some relates to invalid forward estimate.	
Actions taken to resolve the issue		Completion date
Aware of issue and looking at IT support to help identify FE incorrect data		28.01.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Manually updated on report at present		28.01.2020

Title: Historical estimates and forward estimates		
Non-compliance	Description	
Audit Ref: 12.11 With: Clause 4 and 5 Schedule 15.3 From: Jun-19 and Sep-19	Historic estimate is not calculated as expected for submission months where a change of NSP has occurred. Potential impact: None Actual impact: None Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak, because the calculation is not operating as expected for ICPs with NSP changes. The impact is assessed to be low, because all consumption is captured and where NSP changes occurred both NSPs were within the same balancing area.	

Actions taken to resolve the issue	Completion date	Remedial action status
Aware of issue and checking manually and correcting	28.01.2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Agility is aware of the issue and in place to fix	28.01.2020	

Title: Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Nov-19 To: 30-Nov-19	For at least 13 ICPs on the November 2019 AV080 submission, forward estimate was provided for a period where historic estimate could be calculated. 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. For some (but not all) switches out, Orion is calculating invalid forward estimate. Pioneer was not aware of this issue, and there were not controls in place to detect and correct the invalid forward estimate. The audit risk rating is low, based on the estimated number of switches out per month and estimated forward estimate volumes. The historic estimate is correct for the affected ICPs, and the invalid forward estimate is in addition to this historic estimate volume.	
Actions taken to resolve the issue	Completion date	Remedial action status
Aware of issue and manually correcting	28.01.2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Checked and FE manually updated if required	28.01.2020	

Title: Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: Jul-Sep 18 (r14), Feb-Mar 19 (r7) and Jun 19 (r3)	Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as they were sufficient to ensure that most NSPs are close to the target values, but there was room for improvement. The impact is assessed to be low. Some of the forward estimate relates to unmetered load which is true historic estimate, but is incorrectly classified, and some relates to invalid forward estimate.	
Actions taken to resolve the issue		Completion date
Aware of issue		28.01.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Aware of issue and manually updated if required		28.01.2020
		Identified