

Compliance plan for Counties Power Distributor– 2019

Requirement to provide complete and accurate information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clauses 11.2(1) and 10.6(1) From: 16-Aug-18 To: 31-Aug-19	Registry information not complete and accurate in all instances. 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 as all but a few discrepancies are being captured. The use of the audit compliance report would move this to strong. The risk rating is low as the number of discrepancies found were small in relation to the volume of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Investigated and resolved any issues as they were found during the audit.		27/09/2019	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to review data and utilise the EA reports to find these discrepancies. Looking at updating our current BI report to highlight these as well as reviewing and identifying the root causes to prevent these in the future.		01/12/2019	

Provision of ICP Information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 11.7 From: 01-Apr-19 To: 03-Oct-19	One ICP with a missing initial electrical connection date. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as Counties Power has robust reporting in place to monitor this. The one missing initial electrical connection date was due to the metering not being recertified. The risk rating is low as the only one ICP was found to have a missing initial electrical connection date recorded.		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected this ICP on date of audit		24/09/2019	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to utilise existing reporting.		10/10/2019	

Timeliness of ICP information to the Registry Manager			
Non-compliance	Description		
Audit Ref: 3.4 With: Clause 7(2) of schedule 11.1 From: 21-Dec-18 To: 14-Jan-19	Two ICPs not updated prior to electricity being traded. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as reporting is in place to identify this and this is monitored daily. The risk rating is low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action could be taken here.		24/09/2019	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to monitor rejected files.		10/10/2019	

Timeliness of initial electrical connection date		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 7(2A) of schedule 11.1 From: 01-Apr-08 To: 31-Aug-19	81 initial electrical connection dates not updated within ten business days. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as reporting is in place to identify this and this is monitored daily. The risk rating is low as the volume of ICPs affected is small.	
Actions taken to resolve the issue		Completion date
No action could be taken here.		24/09/2019
Preventative actions taken to ensure no further issue will occur		Completion date
Continue to monitor current reporting.		10/10/2019

Connection of an ICP that is not an NSP			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 11.17</p> <p>From: 21-Dec-18</p> <p>To: 14-Jan-19</p>	<p>Two ICPs connected before a trader was recorded on the registry as accepting responsibility.</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>Controls are rated as strong as reporting is in place to identify this and this is monitored daily.</p> <p>The risk rating is low as the volume of ICPs affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action could be taken here.		24/09/2019	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to monitor rejected files.		10/10/2019	

Monitoring of “new” & “ready” statuses			
Non-compliance	Description		
Audit Ref: 3.14 With: Clause 15 of schedule 11.1 From: 16-Aug-18 To: 31-Aug-19	Traders not contacted in two instances to confirm if ICPs at the “New” status were still required. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, with the reporting dashboard and the audit compliance reporting in place, the aging of ICPs has a good level of visibility. The risk rating is low this has no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Decommissioned the ICP’s		24/09/2019	Cleared
Preventative actions taken to ensure no further issue will occur		Completion date	
Decommissioned the ICP’s		24/09/2019	

Timeliness of registry updates			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 8 Schedule 11.1 From: 16-Aug-18 To: 31-Aug-19	Some price, network, status, and address changes were backdated. Potential impact: Medium Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as controls are sufficient to mitigate risk most of the time but there is room for errors to occur. The risk rating is low as these events have no direct impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action could be taken here.		24/09/2019	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Changes to the ownership of the pricing update processes should now reduce some of these events. Also reviewing current process for address changes however most of the address changes occurred during meter changes and updating the ICP's from Lot/DP to a street number.		10/10/2019	

Notice of NSP for each ICP		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 16-Aug-18</p> <p>To: 31-Aug-19</p>	<p>14 ICPs mapped to the incorrect NSP.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>Controls are rated as weak as changes of NSP to ICPs are applied to active ICPs only resulting in incorrect NSPs being recorded against any ICPs that subsequently return to an active status.</p> <p>The risk rating is low as Counties Power has one balancing area and therefore an incorrect NSP has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
An investigation was completed, it was found our system was only updating ICP's in a status of "active". This meant that if a temporary change of NSP occurred and an ICP status changed during the 14days then it would mis-match.		23/09/2019
Preventative actions taken to ensure no further issue will occur		Completion date
Review of NSP vs ICP allocation, looking at adding this to current BI Reporting.		01/02/2019
		Investigating

ICP location address		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 2 Schedule 11.1</p> <p>From: 16-Aug-18</p> <p>To: 31-Aug-19</p>	<p>581 ICPs with addresses that are not readily locatable.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</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 will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
We currently have an ongoing programme of work to get these addresses updated. We monitor this using a Power BI report.		24/09/2019
Preventative actions taken to ensure no further issue will occur		Completion date
Most addresses are historical, continue to monitor power BI report.		24/09/2019
		Identified

Distributor to provide ICP information		
Non-compliance	Description	
<p>Audit Ref: 4.6</p> <p>With: Clause 7(1) Schedule 11.1</p> <p>From: 16-Aug-18</p> <p>To: 31-Aug-19</p>	<p>Eight ICPs with an incorrect initial electrical connection date populated during the audit period.</p> <p>314 ICPs created prior to part 10 with an incorrect initial electrical connection date recorded.</p> <p>Two ICPs with the incorrect unmetered load recorded.</p> <p>Dedicated flag applied to all ICPs when NSP changes indicate that not all ICPs are dedicated.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Multiple</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 will mitigate risk most of the time but there is room for errors to occur.</p> <p>The risk rating is low as the errors found will have either no or a small impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
All ICP's where corrected where they could be during the audit		24/09/2019
Preventative actions taken to ensure no further issue will occur		Completion date
Reporting is already in place to monitor all new ICP's which move into an active status without an energisation date entered		24/09/2019
		Identified