

Compliance plan for Pulse (CPPL) - 2017

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.12 With: Clause 10.36 From: 01-Apr-18 To: 11-Dec-17	There are no arrangements in place with Nova, AccuCal and Contact Energy. Each of these MEPs supplies metering to one CPPL ICP. Potential impact: Low Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because there is room for improvement. There is no impact resulting from this non-compliance, however there is a minor future risk; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We know that MEPs maintain a relationship with EDMI, which provides our data (and bills us). CPPL is a part of Pulse and Pulse has contractual relationships with Nova and Contact Energy and most other MEPs (excluding AccuCal). CPPL will ensure that its participant obligations are covered by Pulse's arrangements.		01/02/18
Preventative actions taken to ensure no further issues will occur		Completion date
MEPs will be checked on future switches		01/02/18
		Investigating

Changes to registry information	
Non-compliance	Description
Audit Ref: 3.3 With: Clause 11.7(2) From: 05-Sep-17 To: 15-Nov-17	8 late registry updates to active. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating

Low	<p>Controls are rated as weak because they do not mitigate risk most of the time.</p> <p>There is a minor impact on invoicing for some ICPs and on other traders if ICPs switch out with the incorrect status; therefore, the audit risk rating is low.</p> <p>Updates to active are processed, and flow through to the reconciliation systems so that they can be incorporated into revision submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have checked 'status' using the LIS file for all current ICPs.		15/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will generate LIS files weekly, and run a check for ICPs with non-active status. Anomalies will be investigated and, if necessary, updated at that time.		01/02/2018	

Provision of information to the registry			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Of Schedule 11.1</p> <p>From: 08-Sep-17</p> <p>To: 04-Dec-17</p>	<p>Registry not populated within 5 business days for two newly electrically connected ICPs.</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>I have rated the controls as weak because they did not identify these two ICPs.</p> <p>Settlement has not occurred for these two ICPs, therefore the impact is considered minor leading to a low audit risk rating.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
ICPs have been updated, and will be included in forthcoming washups		01/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Any further instances will be flagged by the new check described under section 3.3		01/02/2018	

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1(k) of Schedule 11.1 From: 08-Sep-17 To: 04-Dec-17	One incorrect ANZSIC code. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate because compliance is achieved most of the time. There is a minor impact on reporting conducted by the Authority, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The offending ANZSIC code has been updated		21/11/17
Preventative actions taken to ensure no further issues will occur		Completion date
ANZSIC codes will be checked monthly in the LIS file, after washup submissions		01/02/2018
		Remedial action status

Changes to unmetered load		
Non-compliance	Description	
Audit Ref: 3.7 With: Clause 9(1)(f) of Schedule 11.1 From: 01-Feb-17 To: 04-Dec-17	Inaccurate unmetered load figure for one ICP. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as weak because they did not identify this discrepancy. There is a minor impact on settlement and a potential impact on other participants if this ICP had switched out with the incorrect details.	
Actions taken to resolve the issue		Completion date
Registry to be updated		14/12/2017
Preventative actions taken to ensure no further issues will occur		Completion date
		Remedial action status

For any new ICPs with UML, the trader and network details will be compared with the daily unmetered kWh figure. In the event of a discrepancy, the network will be asked to confirm their details, and trader details updated to match network.	01/02/2018	
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Management of "active" status		
Non-compliance	Description	
Audit Ref: 3.8 With: Clause 17 of Schedule 11.1 From: 01-Feb-17 To: 04-Dec-17	Incorrect status for two new connections and eight reconnections. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate because they achieve compliance most of the time. There is a minor impact on settlement and a potential impact on other participants when ICPs switch out with the incorrect status.	
Actions taken to resolve the issue		Completion date
Status of new connections updated		27/11/2017
Preventative actions taken to ensure no further issues will occur		Completion date
ICPs with Inactive status will be flagged by the review process described under section 3.3.		01/02/2017
		Identified

Management of "inactive" status	
Non-compliance	Description
Audit Ref: 3.9 With: Clause 17 of Schedule 11.1 From: 01-Feb-17 To: 04-Dec-17	Incorrect status for two new connections. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

Low	<p>I have rated the controls as moderate because they achieve compliance most of the time.</p> <p>There is a minor impact on settlement and a potential impact on other participants when ICPs switch out with the incorrect status.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Past changes have been updated		1/12/17	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
ICPs with Inactive status will be flagged by the review process described under section 3.3.		01/02/2018	

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: 09-Aug-17</p> <p>To: 01-Sep-17</p>	<p>Late NT file for one ICP.</p> <p>Potential impact: Medium</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 there is room for improvement.</p> <p>The impact on the consumer was minor; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
NT was sent within 1 day after second customer contact			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Better procedures and staff training are required to ensure that tasks are both generated and assigned correctly within appropriate timeframes.</p> <p>In this case there was perceived to be an ambiguity about whether the customer should be signed up immediately, or more information required, and this was not resolved. This was a training/procedural issue.</p>		01/03/2018	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 of Schedule 11.3 From: 09-Nov-17 To: 09-Nov-17	Incorrect daily consumption figure for ICP 0001436762UN57B. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate because they achieve compliance most of the time. There is a minor impact on other participants, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
There is no mechanism for correcting the daily kWh field after a switch has been completed, therefore no resolution has been attempted of this instance. Since the site is AMI enabled, the gaining retailer should have no need to use daily kWh for estimation.		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
Outgoing CS files are already reviewed to ensure closing reads are correctly recorded. This check will be expanded to review estimated daily consumption.		01/02/2018
		Identified

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 19-Oct-17 To: 27-Nov-17	1 late AC file for switch move. Potential impact: Low Actual impact: Low Audit history: multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as they are sufficient to mitigate risk most of the time. CPPL generally sends RR files as soon as practicable after identifying that a change is required.	
Actions taken to resolve the issue		Completion date
		Remedial action status

The late AC file was caused by registry rejection of a submitted file, which was not immediately noticed. The file was corrected and re-sent when the issue was spotted	Oct 2017	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Training and procedures have been updated to ensure that rejected registry files are checked daily	Oct 2017	

Derivation of meter readings		
Non-compliance	Description	
<p>Audit Ref: 6.6</p> <p>With: Clause 3(2) of schedule 15.2</p> <p>From: 01-Apr-17</p> <p>To: 11-Dec-17</p>	<p>Customer readings not validated against another "set" of actual readings.</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 CPPL has changed their process to ensure two actual reads are used for validation.</p> <p>There was no evidence of incorrect bills or submission information; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Controls have been implemented to exclude customer reads from reconciliation, unless validated. Future washups will reflect this change.		01/12/2017
Preventative actions taken to ensure no further issues will occur		Completion date
Customer reads will not be sent to reconciliation unless validated against at least two non-customer reads		01/12/2017

Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 06-Jun-17 To: 31-Jul-17	One ICP not read during the period of supply. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong because they mitigate risk most of the time. The impact on settlement is minor therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
At the time of the unread meter switch in, we had effectively (temporarily) lost the means to communicate with Wells (because of staff and infrastructure changes). This channel has since been restored, and QM procedures updated.		01/11/2017
Preventative actions taken to ensure no further issues will occur		Completion date
Triggers already exist to flag meters that have switched on an estimated read; these will be extended to flag instances where Wells needs to be notified.		01/02/2018
		Cleared

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Feb-17 To: 30-Nov-17	HHR aggregates file does not contain electricity supplied information. Potential impact: None Actual impact: None Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	This is an error in the code; CPPL is providing submission information as expected.	
Actions taken to resolve the issue		Completion date

CPPL believes that the code is in error. We will support proposals to change the code to accurately reflect current industry practice.	n/a	Unknown
Preventative actions taken to ensure no further issues will occur	Completion date	
CPPL believes that the code is in error. We will support proposals to change the code to accurately reflect current industry practice.	n/a	

Creation of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.2</p> <p>With: Clause 15.2, 15.4 and 15.12 of part 15</p> <p>From: 01-Mar-17</p> <p>To: 31-Mar-17</p>	<p>One incorrect AV080 file for March 2017.</p> <p>Potential impact: Medium</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 because they have been strengthened since the error in March 2017.</p> <p>There was a minor impact on settlement, which was corrected, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The initial error was corrected in subsequent washups (from 3 months onward)		May 2017	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New checks have already been introduced to prevent anomalous readings being used in NHH submission.		May 2017	

Market Administrator Meter Reading Reports		
Non-compliance	Description	
Audit Ref: 13.1 With: Clauses 8 & 9 of Schedule 15.2 From: 20-Jun-17 To: 20-Oct-17	Five meter reading frequency reports submitted late. Potential impact: None Actual impact: None Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak as they are not sufficient to mitigate risk most of the time. The late submissions had no impact on other participants, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Reports have been provided to the EA		1/12/2017
Preventative actions taken to ensure no further issues will occur		Completion date
Future reports will be co-ordinated with those for PUNZ.		01/02/2018