

Compliance plan for Simply Energy Limited

Title: Provision of information to the registry manager			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 15.2 From: 01-Sep-17 To: 11-Jul-18	One SIMP ICP had an incorrect ANZSIC code recorded. One inactive SELX ICP had an incorrect end date. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they are sufficient to ensure that most information is correct, and the errors identified appear to be isolated. The audit risk rating is low. The incorrect ANZSIC code has no impact on settlement and the incorrect inactive status date has a very minor impact on settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status
Both issues have been identified and resolved.		9 August 2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
I believe the correct measures are already in place to catch any discrepancies.		16 August 2018	

Title: Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11 With: Clause 10.33A</p> <p>From: 01-Jul-17 To: 16-May-18</p>	<p>Eight SIMP new connections did not have their meters certified within five business days for electrical connection.</p> <p>Four SIMP reconnections had expired certification recorded on the registry when they were reconnected. For all four it appears the MEP information recorded on the registry is incorrect.</p> <p>One SIMP ICP did not have its meter recertified when it was unbridged.</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>Certification is an MEP responsibility, and for some of the non-compliant ICPs it appears the information the MEP has recorded on the registry is incorrect.</p> <p>Controls are rated as moderate because Simply Energy has processes in place to ensure meters are certified before the ICP becomes active and a small number of ICPs are affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Proposed change to reconnection process to check that the ICP has a current certified meter. If it isn't then a Field Service job will be initiated to certify this meter.		31 August 2018	Identified
For unbridged meters, we have modified existing process to ensure any in this state are certified when the unbridging occurs.		9 August 2018	
Preventative actions taken to ensure no further issues will occur		Completion date	
New process put in place for Reconnections and unbridging meters.		31 August 2018	

Title: Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Jul-17 To: 11-Jul-18</p>	<p>24 late status updates for SIMP.</p> <p>33 late MEP nominations for SIMP and one late MEP nomination for SELX.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times 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, because most status updates and MEP nominations were processed on time and most of the delays were minor.</p> <p>The impact is assessed to be low, and I saw evidence that some of the late updates were to correct information.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>For late MEP nominations Simply Energy now claims all new NHH ICPs and sets the status to inactive, connection in progress. This will eliminate the late MEP nominations that exists on new sites.</p> <p>Also for meter changes our Field Service template now has an entry to remind users to nominate the MEP when sending the work order off.</p>	1 August 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Simply Energy will investigate all late status updates to identify any further changes in process that are required.	30 September 2018	

Title: 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: 29-Jun-18</p> <p>To: 27-Apr-18</p>	<p>21 SIMP and one SELX status update were not processed within five business days of the event on the Registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Most status updates were processed on time. Most of the delays were minor and for valid reasons. I saw evidence that Simply Energy's data review processes were identifying status mismatches for prompt correction.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy will review all late status updates for the next two months to see if we can improve our performances further.		30 September 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will review based on any late updates for further improvement.		31 October 2018	

Title: ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1(k)) of Schedule 11.1 From: 01-Sep-17 To: 11-Jul-18	One SIMP ICP had an incorrect ANZSIC code recorded. 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 are sufficient to ensure that most ANZSIC codes are recorded correctly. The audit risk rating is low, because the unknown ANZSIC codes have been corrected and only one of the sample was found to be incorrect.	
Actions taken to resolve the issue		Completion date
The incorrect ANZSIC code has been updated		7 August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
No further action is required		16 August 2018
		Cleared

Title: Management of “inactive” status			
Non-compliance	Description		
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 03-May-18 To: 04-May-18	One inactive SELX ICP had an incorrect end 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	The controls are rated as strong, this appears to be an isolated data processing error. The impact is rated as low; the ICP was vacant prior to becoming inactive and has since been decommissioned. There is no impact on submission volumes.		
Actions taken to resolve the issue		Completion date	Remedial action status
The incorrect date has been corrected		16 July 2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
There is no further action required.		16 August 2018	

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: 24-Nov-17 and 18-Jul-17</p>	<p>An incorrect AN response code was provided for two SIMP ICPs with AMI metering. AA was applied instead of AD.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 the process to select the AN response code is manual, and two errors were detected in the small sample checked.</p> <p>The impact is low. Other participants can confirm whether AMI metering is in place through other registry fields.</p>	
Actions taken to resolve the issue		Completion date
This issue has been resolved, the wrong codes were being applied prior to November 2017 but a process update has meant no reoccurrence.		15 December 2017.
Preventative actions taken to ensure no further issues will occur		Completion date
As this is a manual process to assign the response code we are investigating automating the process so that the AMI Metering Flag is checked and auto populates the response code when sending AN files.		31 December 2018
		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: 08-Jun-17</p> <p>To: 06-Jun-18</p>	<p>One SELX and 12 SIMP transfer CS files contained incorrect estimated daily consumption.</p> <p>Two late CS files for SIMP transfer switches.</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 manual process to transfer estimated daily consumption from one field to another in Salesforce before creating the CS is not consistently completed accurately.</p> <p>The potential impact will vary depending on the kWh difference, and whether the gaining retailer creates forward estimates for reconciliation or billing based on the estimated daily consumption provided in the CS file.</p> <p>The impact of the late CS files is assessed to be low.</p>	
Actions taken to resolve the issue		Completion date
Simply Energy is currently reviewing whether we can automate the updating of the average daily kWh values from Datahub. This review should be complete by end of August.		31 August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Once the review is complete we can make the change that is required.		30 November 2018.

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: 31-Aug-17</p> <p>To: 18-Apr-18</p>	<p>One late RR file for a SIMP transfer switch.</p> <p>One SELX RR was not supported by two validated actual reads.</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 as they are sufficient to mitigate the risk of non-compliance most of the time.</p> <p>The impact is assessed to be low, based on the small number of exceptions identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
On all ICPs with non AMI Meters we collect monthly reads. With this now in place it should eliminate the late RR requests.		17 August 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Any new sites with two failed first reads will be prioritised over other no read sites.		31 October 2018	

Title: Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 01-May-18 To: 15-May-18	One SIMP NT file was issued late. 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 and the impact was assessed to be low.	
Actions taken to resolve the issue		Completion date
All switches for action are checked twice daily, used to be once a day. This will detect any ICPs ready for switching.		1 August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
There is no further action that can be taken as twice daily action should be sufficient.		1 August 2018

Title: Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 05-Jun-18	An incorrect AN response code was provided for two SIMP ICPs which were vacant. OC was applied instead of AD. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate because the process to select the AN response code is manual, and two errors were detected in the small sample checked. Both files were processed on the same day and time.</p> <p>The impact is low. Other participants normally confirm AMI metering is in place for the affected ICPs through other registry fields.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Investigate making the creation of an Acknowledgement File auto assign the response code based on the AMI information. This would eliminate the manual step of applying the response code.		30 September 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Auto assign response codes.		30 November 2018	

Title: Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10 With: Clause 11 Schedule 11.3</p> <p>From: 05-Jul-17 To: 08-Jun-18</p>	<p>One SELX and 10 SIMP switch move CS files contained incorrect estimated daily consumption.</p> <p>Five late CS files for SIMP switch moves.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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 manual process to transfer estimated daily consumption from one field to another in Salesforce before creating the CS is not consistently completed accurately.</p> <p>The potential impact will vary depending on the kWh difference, and whether the gaining retailer creates forward estimates for reconciliation or billing based on the estimated daily consumption provided in the CS file. The impact of the late CS files is assessed to be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy is currently reviewing whether we can automate the updating of the average daily kWh values from Datahub. This review should be complete by end of August.		31 August 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Once the review is complete we can make the change that is required.		31 October 2018	

Title: Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
<p>Audit Ref: 4.11</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 18-Aug-17</p> <p>To: 28-Feb-18</p>	<p>Two late RR file for SIMP switch moves.</p> <p>Two SIMP RRs were not supported by two validated actual reads.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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 as they are sufficient to mitigate the risk of non-compliance most of the time.</p> <p>The impact is assessed to be low, based on the small number of exceptions identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
On all ICPs with non AMI Meters we collect monthly reads. With this now in place it should eliminate the late RR requests.		17 August 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Any new sites with two failed first reads will be prioritised over other no read sites.		31 October 2018	

Title: Gaining trader to advise the registry manager - gaining trader switch	
Non-compliance	Description
<p>Audit Ref: 4.14</p> <p>With: Clause 16 Schedule 11.3</p> <p>From: 15-Jun-17</p> <p>To: 22-Sep-17</p>	<p>Three late CS files for SIMP HH switches.</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, as they are sufficient to ensure that CS files are sent on time most of the time.</p> <p>The impact of the late CS files is assessed to be low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
The process to use the Salesforce Dashboard, rather than the registry switch breach report, for monitoring timeframes has been reviewed and reinforced as a result of the audit recommendation.	15 August 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action as per using the Sales Force Dashboard as above.	15 August 2018	

Title: 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: 01-Aug-17</p> <p>To: 19-Mar-18</p>	<p>Four late NW files for SIMP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 files are sent on time unless exceptional circumstances exist.</p> <p>The impact is assessed to be low because a small proportion of NWs were issued late.</p>		
Actions taken to resolve the issue	Completion date	Remedial action status	
Simply Energy doesn't see any reason to change the current processes as these four issues were not process related.	17 August 2018	<p>Identified</p> <p>These were isolated late withdrawals.</p>	

Preventative actions taken to ensure no further issues will occur	Completion date	
No further actioned required	17 August 2018	

Title: Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 10.13, Clause 10.24 and 15.13 From: 20-Nov-17 To: 22-Nov-17	One SIMP meter was bridged overnight. 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 Simply Energy's policies do not allow bridging. The meter was bridged without Simply Energy's knowledge or authorisation and was unbridged the following day. The impact is low, because the bridged period was overnight and the consumption was expected to be low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy disputes this as the site was bridged by Contact Energy. So we do not accept this non compliant. Further we have an existing process that does not allow bridging of meters.		17 August 2018	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We believe no further action is required		17 August 2018	

Title: Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clause 5 of schedule 15.2</p> <p>From: 01-Jul-17</p> <p>To: 18-Dec-17</p>	<p>Datacol does not complete phase failure checks.</p> <p>Five customer reads for SIMP ICPs were treated as validated without being validated against a set of reads from another source.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be moderate and the impact is assessed to be low.</p> <p>Phase failure is often not indicated on non-AMI meters. It is expected there would be a relatively small number of meters read by Datacol where phase failure would be present or visible.</p> <p>The number of customer reads not validated against actual reads is low. For all customer readings where later actual reads were obtained, the customer readings were confirmed to be accurate.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Simply Energy is working with Datacol regarding the checks on phase failure and should know soon if their processes will do this in future.</p> <p>Customer reads will as resulting from this audit be completely removed from being used in reconciliation.</p>		31 August 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Moving all manual meter read to providers who do check for phase failures.</p> <p>Customer reads removed from Reconciliation.</p>		31 October 2018.	

Title: NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Jul-17 To: 11-Jul-18	The best endeavours requirement was not met for one SIMP ICP which was unread for 12 months. 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, in most cases exceptional circumstances existed or the best endeavours requirements were met. The impact is low, 12 month read attainment rates are generally high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Simply Energy is reviewing its process for no read events and has noted the Code for this.	31 August 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
With the new process in place this will resolve this issue going forward.	31 August 2018	

Title: Correction of NHH meter readings			
Non-compliance	Description		
<p>Audit Ref: 8.1</p> <p>With: Clause 19(1) Schedule 15.2</p> <p>From: 20-Nov-17</p> <p>To: 22-Nov-17</p>	<p>One correction for a SIMP bridged meter was not processed.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 Simply Energy's policies do not allow bridging, and they are aware that estimates should be created for bridged periods.</p> <p>The impact is low, because the bridged period was two days and the consumption was expected to be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy is currently reviewing the Bridging consumption process and if there is a re-occurrence of another trader bridging one of our ICPs we will then have a process in place.		24/08/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
For the future we believe no action is currently required		24/08/2018	

Title: Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3) Schedule 15.2</p> <p>From: 01-Jul-17</p> <p>To: 18-Dec-17</p>	<p>Five customer reads for SIMP ICPs were treated as validated without being validated against a set of reads from another source.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are assessed to be moderate and the impact is assessed to be low.</p> <p>The number of customer reads not validated against actual reads is low. For all customer readings where later actual reads were obtained, the customer readings were confirmed to be accurate.</p>	
Actions taken to resolve the issue		Completion date
Simply Energy is removing Customer reads from going through the Reconciliation process completely as a result of this audit.		31 August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Customer reads removed from Reconciliation process.		31 August 2018
		Identified

Title: Electronic meter readings and estimated readings			
Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: Clause 17 Schedule 15.2</p> <p>From: 01-Jul-17</p> <p>To: 11-Jul-18</p>	<p>Event log information is not received from Arc.</p> <p>Event log information provided by Metrix and WEL Networks is not routinely reviewed.</p> <p>Potential impact: Medium</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 event logs are received and reviewed for most meters.</p> <p>The audit risk rating is low, because other validations in place are comprehensive and are likely to identify any consumption related issues, therefore the potential impact on settlement is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Simply Energy is currently reviewing its processes as these Event Logs provided are all in different formats.		30 September 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once reviewed we will look at what automation can be obtained and put this in place. We will also review whether we replace all of the Arc meters to comply with the Code.		30 November 2018	

Title: Buying and selling notifications		
Non-compliance	Description	
Audit Ref: 11.1 With: Clause 15.3 From: 01-Oct-17 To: 01-Oct-17	No trading notification was provided for SFI profile for SELX. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	There is no impact, Simply Energy confirmed that reconciliation manager's system recorded the profile correctly, because the allocation data received from the reconciliation manager included this profile.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action can be taken unless the Reconciliation Manager changes the Trade Notification process. Simply Energy disputes the non compliance as the Trading Notification process does not allow for profile information.	17 August 2018	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
We see no further action required on this issue.	31 August 2018	

Title: 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-Jul-17</p> <p>To: 11-Jul-18</p>	<p>Aggregates file contains submission information.</p> <p>Generation only ICPs were temporarily excluded from the HHR aggregates file.</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>The controls are recorded as strong, because one issue is cleared and the other is a code issue.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> • The issue relating to content of the aggregates file is an error in the code, Simply Energy is providing submission information as expected. • The issue relating to generation ICPs being excluded from the aggregates file has been cleared and the affected submissions have been washed up. 	
Actions taken to resolve the issue		Completion date
<p>There is a misalignment between the Code requirements and the RM file specification. It is a problem known to the Authority and we are awaiting the Authority to resolve this.</p> <p>The issue relating to Generation ICPs was resolved after the last audit, there is no further action to be taken.</p>		14 August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Electricity Authority to correct wording in the Code.		Unsure of when this will occur.
		Identified

Title: Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Jan-18 To: 31-Jan-18	Alleged breach 1801SIMP1 was recorded for late provision of revision information. 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 and the risk as low, because submissions are normally completed on time and the breach for late submission was closed early without warning.	
Actions taken to resolve the issue		Completion date
This issue has been cleared by the Compliance at the EA.		31 May 2018
Preventative actions taken to ensure no further issues will occur		Completion date
A recommendation has been proposed to the Reconciliation Manager to further improve the functionality of their portal to report when some files in a zip file fail validation.		Unknown
		Identified

Title: Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Jun-17</p> <p>To: 11-Jul-18</p>	<p>One correction for a SIMP bridged meter was not processed.</p> <p>The unmetered load submission for SIMP ICP 0000028893WE540 contained a calculation error in January 2018.</p> <p>Historic estimate may be labelled as forward estimate where SASV are not available.</p> <p>Five customer reads for SIMP ICPs were treated as validated without being validated against a set of reads from another source.</p> <p>Alleged breach 1801SIMP1 was recorded for late provision of revision information.</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 sufficient to ensure that submissions are on time and correct most of the time.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> the unmetered load error caused under submission of 24 kWh which will be corrected and washed up the mislabelled historic estimate has no impact on the volumes reported only one bridged meter was identified; the bridged period was two days and the consumption was expected to be low the number of customer reads not validated against actual reads is low; for all customer readings where later actual reads were obtained, the customer readings were confirmed to be accurate the breach for late submission was closed early without warning.

Actions taken to resolve the issue	Completion date	Remedial action status
We have corrected the unmetered load error and this will wash through in the coming months. Customer reads will be removed from going through our Reconciliation process.	31 August 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The Customer Reads will be removed from our Reconciliation.	31 December 2018	

Title: Permanence of meter readings for reconciliation			
Non-compliance	Description		
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: Nov 16 r14, Dec 16 r14 and Jan 17 r14	Not all estimates replaced by permanent estimates at R14. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate, because improvements could be made to the labelling of historic estimate. Simply Energy's processes will help to ensure that consumption is captured and reported, and 12 month read attainment rates are generally high. The audit risk rating is low, based on total forward estimate across the three months reviewed of 63,508 kWh.		
Actions taken to resolve the issue	Completion date	Remedial action status	
The relabelling of unmetered load as Historical Estimate instead of Forward Estimate has been investigated and will require a system change. Due to the small number of ICPs this relates to we have not yet prioritised this change.	17 August 2018	Investigating	

Preventative actions taken to ensure no further issues will occur	Completion date	
Simply Energy is working internally on whether to keep the ICPs as they are all for one customer. If they are retained then we will prioritise accordingly the system changes.	30 September 2018	

Title: Historical estimates and forward estimates			
Non-compliance	Description		
<p>Audit Ref: 12.10</p> <p>With: Clause 3</p> <p>Schedule 15.3</p> <p>From: 01-Jul-17</p> <p>To: 11-Jul-18</p>	<p>Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 recorded as moderate because historic and forward estimate is correctly identified most of the time.</p> <p>There is no impact on settlement because the calculation is correct; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The relabelling of unmetered load as Historical Estimate instead of Forward Estimate has been investigated and will require a system change. Due to the small number of ICPs this relates to we have not yet prioritised this change.		31 August 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Simply Energy is working internally on whether to keep the ICPs as they are all for one customer. If they are retained then we will prioritise accordingly the system changes.		30 September 2018	

Title: Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of schedule 15.3</p> <p>From: Nov 16-Jan 17 (r14), Jul 17-Sep 17 (r7) and Oct-Dec 17 (r3)</p>	<p>HE targets not met for some NSPs for some revisions for SIMP.</p> <p>Potential impact: Medium</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 recorded as moderate because there could be some improvement made in the meter reading processes to ensure actual readings are available.</p> <p>There is a minor impact on settlement because the actual data is likely to be different to the estimated data; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Simply Energy actively manages this process of sites with no reads to attempt to get all sites read in a 12 month period.		17 August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
We are currently reviewing all sites not read to see whether they can be disconnected or if Advanced Meters can be installed.		31 October 2018
		Identified