

Compliance plan for Switch Utilities Audit 2018

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 01-Jul-17 To: 15-Feb-18	Some errors found in registry data. 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 are sufficient to mitigate risk most of the time, but there is room for improvement. The audit risk rating is low as the overall volume of ICPs affected is low.	
Actions taken to resolve the issue		Completion date
During the period of the audit, we have introduced new reporting which identifies ICP discrepancies. This should limit the change of reoccurrence.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As above		As above
		Identified

Audit trails		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 21 of Schedule 15.2 From: 01-Jul-17 To: 15-Mar-18	Audit trail not complete for HHR corrections. Potential impact: Medium 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 are sufficient to mitigate risk most of the time, but there is room for improvement. The audit risk rating is low as the overall volume of ICPs affected is low and there was no evidence of incorrect submission information.	
Actions taken to resolve the issue		Completion date
We are continuing to work on a new half hourly reconciliation system which was delayed due to unanticipated internal issues. We have taken on some feedback on the new system calculation methods through discussion with the Auditor in the latest audit and are actively modifying the scripting based on this feedback. We anticipate that a material change audit will be submitted around the same time as this audit is being reviewed by the authority.		TBC
Preventative actions taken to ensure no further issues will occur		Completion date
		Investigating

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 of schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Jan-18</p>	<p>Registry information not updated within 5 business days of the event.</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 will mitigate risk most of the time but some room for improvement was identified.</p> <p>The audit risk rating is low because there is a minor impact on submission for some of the late updates to Active and late MEP nominations can cause MEPs to be late with their metering updates.</p>	
Actions taken to resolve the issue		Completion date
<p>At the time of the delayed updates, Switch Utilities did not have reporting for these scenarios.</p> <p>We identified this issue prior to the audit, and had introduced monitoring reporting which identified all sites on an inactive status and whether they had consumption.</p> <p>This reporting is now monitored to identify sites potentially impacted by this scenario and ICPs that are inactive remain on this report until they are lost or changed to active.</p>		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
<p>This reporting is now monitored to identify sites potentially impacted by this scenario and ICPs that are inactive remain on this report until they are lost or changed to active.</p>		Complete
		Identified

Trader responsibility for an ICP		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 11.18 From: 01-Jun-17 To: 31-Jan-18	One incorrect MEP nomination. Meter readings not obtained for two ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement with regard to MEP nomination. The controls are strong with regard to getting meter readings for decommissioned sites. It's difficult to control the situation where a customer may remove their own metering. The audit risk rating is low as settlement still occurred as required, but the MEP could not populate the registry due to the incorrect nomination.	
Actions taken to resolve the issue		Completion date
This was a one off administrative error, due to an agent not misunderstanding the coding between NGCM and AMCI. The agent now has a better understanding of the circumstances and this should not reoccur.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As noted above, additional training provided to agent.		

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of Schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Jan-18</p>	<p>Registry information not updated within 5 business days of the event for five status changes and one MEP nomination.</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 recorded as moderate because there is room for improvement.</p> <p>The audit risk rating is low as there was only a minor impact on settlement although the MEP could not update the registry on time.</p>	
Actions taken to resolve the issue		Completion date
<p>The error in relation to MEP nomination was a one-off occurrence due to a misunderstanding of which participant code was responsible for an ICP.</p> <p>We had identified the delays in new connection update timeliness and are monitoring this area, endeavouring to ensure better compliance in future.</p> <p>We note that there has been improvement in compliance since the previous audit.</p>		Monitoring
Preventative actions taken to ensure no further issues will occur		Completion date

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 01-Jun-17</p> <p>To: 31-Jan-18</p>	<p>Incorrect ANZSIC codes assigned for 8 of 100 ICPs checked.</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 will mitigate risk most of the time but there are still some errors.</p> <p>There is no impact on other participants or settlement, but there is an impact on the Authority because this information is used for other reporting functions.</p>	
Actions taken to resolve the issue		Completion date
<p>We have added additional reporting for T99 type codes, so that if these are loaded a field services team member will validate the entry and attempt to provide a valid code.</p> <p>As part of the Sales process for commercial connections, we have introduced a new ANZSIC code guided wizard in our Sales tool to assist agents in selecting the correct codes.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>As part of the Sales process for commercial connections, we have introduced a new ANZSIC code guided wizard in our Sales tool to assist agents in selecting the correct codes.</p>		Completed
		Identified

Management of “active” status		
Non-compliance	Description	
Audit Ref: 3.8 With: Clause 17 of Schedule 11.1 From: 01-Jun-17 To: 31-Jan-18	Some ICPs with active status discrepancies. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls will mitigate risk most of the time but some room for improvement was identified. Submission does not occur until the status is changed to Active, therefore there is a minor impact on settlement and the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
During the period being audited we had introduced new reporting to identify sites which are marked as inactive but have consumption, or which are marked as inactive for some time. This will assist the agents in identifying the inconsistencies. Prior to the audit we had cleaned up sites with incorrect statuses.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As Above		
		Identified

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 of Schedule 11.3</p> <p>From: 10-Oct-17</p> <p>To: 11-Oct-17</p>	<p>Three AN files late by one day.</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>Strong controls are in place, there were only three late files and they were all sent on the same day which was one day late.</p> <p>The impact on participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The error was a one-off error which we believe was caused by a system outage on the affected day. AN files are fully automated in our switching system, so reoccurrence is unlikely.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 of Schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 31-Jan-18</p>	<p>Incorrect average daily consumption for 3 ICPs.</p> <p>10 late CS files</p> <p>Potential impact: Medium</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 recorded as moderate because 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
We anticipate that this issue will be resolved by the end of next month, with the release of corrected code for updating ICP daily estimate values.		01/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 15-Aug-17 To: 16-Aug-17	One late AN file by one day. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Switch Utilities' controls are strong and there was only one late file. This has no direct impact on reconciliation hence audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We believe this is a one-off issue due to a system issue, and is unlikely to reoccur. As noted by the Auditor, there was only one example of this during the audit period.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As above		
		Identified

Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 of Schedule 11.3 From: 01-Jun-17 To: 31-Jan-18	Incorrect average daily consumption for 2 ICPs. 172 late CS files. Potential impact: Medium Actual impact: Low 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. Compliance is achieved 80% of the time. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
During the audit period, Switch introduced new automated switching systems. The vast majority of the late files occurred prior to the introduction of this new system, with a few occurring after the introduction as various data issues were resolved. Internal reporting shows substantial improvement, per the table below.		Completed	Identified
ReferenceMonth	TotalEvents		
1/04/2018	147		
1/03/2018	504		
1/02/2018	480		
1/01/2018	310		
1/12/2017	266		
1/11/2017	332		
1/10/2017	287		
1/09/2017	244		
1/08/2017	226		
1/07/2017	104		
1/06/2017	62		
Preventative actions taken to ensure no further issues will occur		Completion date	
As Above			

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 of Schedule 11.3 From: 08-Nov-17 To: 12-Dec-17	Three late RR files and one late AC file. 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 will mitigate risk most of the time. The audit risk rating is low as this will have little to no impact on reconciliation, and the reads provided were correct.	
Actions taken to resolve the issue		Completion date
We believe that these are one-off occurrences and not a systemic issue. We have introduced substantially better switching reporting during the audit period, and we will look to improve these controls based on the auditor feedback over the next few months.		01/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As Above		
		Identified

Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.12 With: Clause 14 of Schedule 11.3 From: 17-Jul-17 To: 12-Oct-17	Two late NT files. 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 recorded as strong and these were isolated incidents, both identified prior to the end of the relevant calendar month The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
As noted by the Auditor, these instances were isolated issues caused by system issues and are unlikely to reoccur. We have automated NT requests out of all of our brands which are generated within a business day of a sale completing.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 of Schedule 11.3</p> <p>From: 07-Nov-17</p> <p>To: 30-Jan-18</p>	<p>Six late AW files by one day.</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>Errors are mitigated most of the time, therefore the controls are rated as moderate.</p> <p>The impact on other participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>We believe these are isolated issues, as a part of the release of our new switching platforms, and we believe that these will reduce over time as we have been cleaning up various data issues which resulted in files not being sent.</p> <p>We have daily monitoring of the switching breach report to attempt to manage any issues in a timely manner wherever possible.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 01-Jun-17 To: 28-Feb-18	NHH meter readings applied to the end of the day before for NHH to HHR changes 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 recorded as strong because registry changes would be required to enable two MEPs on the same day before retailers could apply NHH readings to the end of the day. There is no impact on settlement or other participants; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
As noted by the Auditor, the process applied is effectively an industry standard, with compliance not possible to achieve.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) of Schedule 15.2</p> <p>From: 01-Jun-17</p> <p>To: 28-Feb-18</p>	<p>No process for getting meter readings during the period of supply.</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>Controls are rated as weak because reporting is not in place.</p> <p>The impact on settlement from an estimate for a short period is minor therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Based on previous Authority feedback, during the prior audit period we had introduced reporting which identifies where an ICP having switched in with a last read date which was more than 60 days prior.</p> <p>We monitor this report to identify sites with access or reading attainment issues. We have noted the Auditors feedback that additional reporting should be created to monitor sites lost without readings during the period supply, and we are looking to introduce this reporting in the next few months.</p>		01/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As Above		
		Identified

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) of Schedule 15.2 From: 01-Jun-17 To: 31-Jan-18	Best endeavors not demonstrated for 12 ICPs not read in the previous 12 months. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they achieve compliance most of the time but there is room for improvement. The impact on settlement is minor because estimates have needed to be conducted; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We have identified that a script error in the Switch billing platforms read attainment monitoring report incorrectly resulted in certain ICPs not being collected, which resulted in correspondence not being sent. In addition, we are configuring our system to add SMS to the read attainment process, to add an additional method of communication with customers.		Completed
		01/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As above		
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) of Schedule 15.2</p> <p>From: 01-Jun-17</p> <p>To: 31-Jan-18</p>	<p>Best endeavors not demonstrated for 14 ICPs not read in the previous four months.</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 achieve compliance most of the time but there is room for improvement.</p> <p>The impact on settlement is minor because estimates have needed to be conducted; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>We have identified that a script error in the Switch billing platforms read attainment monitoring report incorrectly resulted in certain ICPs not being collected, which resulted in correspondence not being sent.</p> <p>In addition, we are configuring our system to add SMS to the read attainment process, to add an additional method of communication with customers.</p>		Completed
		01/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Electronic meter readings and estimated readings			
Non-compliance	Description		
Audit Ref: 9.6 With: Clause 17 of Schedule 15.2 From: 01-Jun-17 To: 28-Feb-18	Event logs not received from ARC Innovations. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating:		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement could be minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have been in communication with ARC, who have advised that they are unable to provide this information to any retailer. ARC have advised they have a project underway to allow them to supply this information to retailers, so we are currently awaiting their provision of this data.		TBC	
Preventative actions taken to ensure no further issues will occur		Completion date	

Calculation of ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Jun-17</p> <p>To: 28-Feb-18</p>	<p>ICP days calculation incorrect for one scenario.</p> <p>January 2018 Day 4 ICP days inaccurate.</p> <p>Potential impact: Medium</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 recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>In relation to the ICP Days calculation issue, we had predominantly fixed the problem by applying non-default estimates however there were a small number of ICPs which were not fixed due to the error. This occurs when an ICP has been withdrawn after the LIS file is generated, and we are building additional handling for this situation.</p> <p>We are in discussion with our system developer on a more permanent fix for this situation.</p> <p>See Section 12 for commentary on the Day 4 ICP Days issue.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
We are now loading non-default estimates for all sites to ensure they are not affected by Scenario H-B		Completed
		Investigating

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7</p> <p>From: 01-May-17</p> <p>To: 28-Feb-18</p>	<p>Inaccurate electricity supplied data for May 2017.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 recorded as weak because this issue was not identified until the time of the audit.</p> <p>This data is used as an indicator and there is no impact on settlement; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>As noted by the Auditor, this was an error due to some bad data in the non-Switch Utilities brand system. Our generation system functions by collecting "billed" flagged information from the Switch Utilities billing platform, and then adding "billed" flagged information from the Slingshot/Orcon/Vocus Communication branded billing platform ("Billplus")</p> <p>Due to an error when flagging certain information as invalid in the Billplus system, information for Switch ICPs which should be marked as "unbilled" (as that system holds information for all ICPs, but it is not used for Switch Utilities branded ICPs) was marked as "billed" and aggregated into the electricity supplied data.</p> <p>We have updated our generation scripting to exclude "Switch Utilities" branded data from being collected from Billplus, as "Switch Utilities" brand data is never billed in Billplus. This will prevent any such incorrect information from being aggregated.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

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-Jun-17</p> <p>To: 28-Feb-18</p>	<p>Aggregates file contains submission information.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>The controls are recorded as strong because there are no improvements required.</p> <p>There would be a negative impact on RM reporting if the file contained electricity supplied information; therefore I've used the lowest audit risk rating of low.</p>	
Actions taken to resolve the issue		Completion date
<p>Switch Utilities has raised a code-change request with the Authority to resolve this issue. We understand this is currently under review by the Authority.</p> <p>There is no other action that can reasonably be taken here.</p>		TBC
Preventative actions taken to ensure no further issues will occur		Completion date
		Cleared

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Jan-18 To: 31-Jan-18	Inaccurate submission information for January 2018 Day 4. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement was moderate; therefore the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
This was a one-off human error in submission information for Day 4 of January 2018, caused by a training issue with a new agent performing reconciliation functions who requested an incorrect LIS file. We detected this error prior to the Day 13 issue of the same month and resolved it in the revision submission.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
We introduced two additional processes to prevent recurrence, which were: <ol style="list-style-type: none"> We have automated the generation of the Reconciliation LIS file – so that there is no opportunity for the user to request the LIS information incorrectly We have added an additional check using an independent LIS file for each month, to reduce the likelihood of an incorrect LIS file not being detected in the secondary check. 		Completed
		Identified

Allocation of submission information		
Non-compliance	Description	
Audit Ref: 12.3 With: Clause 15.5 From: 01-May-17 To: 31-Jan-18	Zeroing did not occur for three GXPs. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement was over submission of 1,013.33 kWh which is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We have introduced a new process to identify rows existing in prior files which are not in subsequent files, so appropriate zero-lines can be generated in revision submissions.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: Clause 4 of Schedule 15.2</p> <p>From: 01-Oct-16</p> <p>To: 31-Oct-16</p>	<p>HE not 100% for two GXPs for October 2016.</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The impact on settlement is dependent on the accuracy of estimates and there is only 1,025 kWh in total so even if the estimates are 20% out it will only be 200 kWh. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>We had incorrectly understood that Permanent Estimates cannot be created for ICPs where you have no other readings to validate the estimate against.</p> <p>We have been advised that the Authority has taken the view that Permanent Estimates can be generated for this scenario, and we will be adding them for the April Day 13 submissions and onwards.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Reconciliation participants to prepare information		
Non-compliance	Description	
Audit Ref: 12.9 With: Clause 2 of Schedule 15.3 From: 01-May-17 To: 28-Feb-18	Incorrect submission information. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement is moderate; therefore the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
The generation issue is outstanding, tied in with the release of the new half hour reconciliation platform. The amount of generation impacted is quite small, at approximately 400-600 kWh per month. See other Section 12.2 and Section 12.3 for commentary on issues 2 and 3.		
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 of Schedule 15.3 From: 01-Jul-17 To: 31-Jul-17	One balancing area with a difference greater than 15% and 100,000 kWh. One incorrect FE scenario Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
This error was identified during the revision processes, and has been corrected on subsequent revisions.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
We have introduced additional checks against billing data to assist in detecting this type of error.		Completed
		Identified

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.4 With: Clause 10 of Schedule 15.3 From: 01-Aug-16 To: 31-Aug-17	HE targets not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We have acknowledged the Auditors feedback in this area, and resolution is primarily dependent on improvements in read collection. We are looking to improve our no-read management processes as noted in earlier sections.		01/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date