

Compliance plan for Plus Energy - 2018

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clauses 11.2 & 15.2 From: 01-Apr-17 To: 28-Feb-18	Some registry and submission related errors 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 are still some improvements to make. There is a minor impact on settlement and other participants therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
For those ICPs that had an incorrect switch event meter reading we will include the one day of consumption for each of these ICPs in the next revision file so that there is a match between the switch read and what is submitted to the RM. No corrective action has been required due to the low/minor impact of the issues reported on.		26 Mar 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Refresher training completed, process and procedure documentation reviewed and amended where required. In one instance an additional manual check has been implemented.		26 Mar 2018
		Identified

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: 31-Jan-18</p> <p>To: 06-Mar-18</p>	<p>One status update was not processed within five business days of the event on the Registry. The incorrect event date was used.</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 Plus Energy was monitoring this new connection but had difficulty getting information from the field.</p> <p>Settlement did not occur for January or February on Day 4 of the month following, therefore there is a minor impact. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Requirement to update within 5 business days has been noted. In this instance we were waiting for advice back from the Distribution Company managing this new connection through their contractor as to the status of this installation. Our processes also required as to sight evidence of the Certificate of Compliance and/or Record of Inspection, neither of which have been provided to us. We updated the registry once we received notice that the ICP was live, however this was beyond the 5-day requirement.		26 Mar 2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We will in future update the registry within 5 days even if we have not received copies of the Certificate of Compliance (COP) and/or Record of Inspection (ROI), to be compliant with this requirement.</p> <p>We have updated our process and procedure document to remove the requirement to site the COC and/or ROI before updating the registry.</p>		26 Mar 2018
		Identified

Change of MEP			
Non-compliance	Description		
Audit Ref: 3.11 With: Clause 10.22(1)(a)(i) From: 20-Nov-17 To: 04-Dec-17	One late MEP nomination. 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. There is a minor impact on the MEP because they could not update their details until they were nominated; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have changed our process so that we now update the registry with the nominated MEP when we raise the meter replacement request.		26 Mar 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Changed our process to update the registry at the time the meter replacement request is raised with the MEP		26 Mar 2018	

Losing trader response to switch request and event dates - standard switch			
Non-compliance	Description		
Audit Ref: 4.2 With: Clause 3 of schedule 11.3 From: 13-Nov-17 To: 01-Jan-18	An incorrect AN response code was provided for two ICPs with AMI metering. AA was applied instead of AD. Potential impact: None Actual impact: None 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 participants is minor because they use the registry fields to determine whether and ICP is AMI or not, the AN file code is not used for this purpose; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We had overlooked the requirement to apply the appropriate response code when we are the losing retailer.		26 Mar 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The auditor clarified the Authority’s advice that “AA” should only be used when none of the other codes are valid, and that AD should be used if advanced metering is present. We have updated our process and procedures document to incorporate this step/requirement in the process.		26 Mar 2018	

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: 13-Dec-17</p> <p>To: 13-Dec-17</p>	<p>Incorrect switch event meter reading or one ICP</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action required, we believe the switch date supplied by the gaining retailer was incorrect and we have supplied the correct reading for the correct switch date.		26 Mar 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>We accept the correct process going forward would be to reject the switch “date fail” and have the gaining retailer resubmit the switch with the correct switch date.</p> <p>Process update included with the use of AN response codes as per 4.2. above.</p>	26 Mar 2018	
--	-------------	--

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) of schedule 11.3</p> <p>From: 01-Sep-17</p> <p>To: 01-Feb-18</p>	<p>An incorrect AN response code was provided for three ICPs with AMI metering. AA was applied instead of AD.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk with regard to timeliness but there is room for improvement with regard to response codes.</p> <p>The impact on participants is minor because they use the registry fields to determine whether and ICP is AMI or not, the AN file code is not used for this purpose; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Please refer to point 4.2. above, this is the same issue identified in point 4.2. above. We had overlooked the requirement to apply AN response codes, have since received training on this and have updated our processes accordingly.		26 Mar 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Please refer to point 4.2. above, we have updated our process and procedures document to incorporate this step/requirement in the process.		26 Mar 2018
		Identified

Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 of schedule 11.3 From: 27-Sep-17 To: 31-Oct-17	One CS file contained an inaccurate average daily consumption figure (3 instead of 6) Two CS files contained incorrect switch event meter readings 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 are effective with regard to timeliness but they need improvement with regard to content. 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
We will include the one day of consumption in the next revision file so that there is a match between the switch read and what is submitted to the RM		Next revision file submission	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Refresher training completed. Process document has been reviewed and amended to clearly state the date of final read to be used.		26 Mar 2018	

Electricity supplied information provision to the reconciliation manager	
Non-compliance	Description
Audit Ref: 11.3 With: Clause 15.7 of part 15 From: 01-May-15 To: 31-Mar-16	One electricity supplied error 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>The controls are recorded as moderate because the process for file creation and aggregation is correct but there was one error for the second month of submission which was only identified during this audit.</p> <p>There is no impact on settlement or other participants therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have included an audit step in the process by way of having someone other than the person who submits the file check this.		26 Mar 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>In future we will have the submission file checked by someone other than the person who submits the file.</p> <p>This task will be added to our register of regular tasks and activities that need to be completed.</p>		26 Mar 2018	

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8 of part 15</p> <p>From: 01-Apr-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: 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 the aggregates file is correct compared to the functional specification.</p> <p>There is no impact on settlement because the aggregates file is only used for reporting; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>As we understand this, in practice we are operating correctly and it's the code that does not reflect actual operating processes and requirements.</p> <p>The authority needs to change the code to match current day operating practices and procedures.</p> <p>We therefore believe we should not be recorded as being non-compliant here.</p>		Awaiting code change/update by Authority	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

None. Nothing we can do	Awaiting code change/update by Authority	
-------------------------	--	--

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.5 of part 15</p> <p>From: 31-Jan-18</p> <p>To: 19-Mar-18</p>	<p>Late submission for one ICP.</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 minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>This is the ICP reported on in point 3.5. above.</p> <p>To redcap we were waiting for confirmation that the site had been made live and we were seeking a copy of the COP and/or ROI by the distribution company managing this installation (new connection). We had not been advised the site was live and had not been provided with evidence of either the COP and/or ROI therefore we had not updated the register within the timeline required (5 business days).</p>		26 Mar 2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>As per the preventative action set out in point 3.5. above we have updated our process and procedures so that we no longer require notification of the COP and/or ROI before updating the registry.</p>		26 Mar 2018
		Identified

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: 01-May-17</p> <p>To: 31-Aug-17</p>	<p>HE targets not met for two NSPs for the 3 month revisions.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because there are sound processes in place and very few ICPs are unread.</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
These are historical events and cannot be "resolved" it was caused by a combination of a small number of ICPs active on the NSP and that these ICPs were non-AMI.		26 Mar 18
Preventative actions taken to ensure no further issues will occur		Completion date
We have instituted scheduled monthly reads through WELLS to ensure that actual reads are obtained in a timely manner.		1 Feb 2018
		Identified