

Compliance plan for Simply Energy Reconciliation Participant Audit 2022

Relevant information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11.2 & 15.2 From: 1-Mar-21 To: 1-Dec-21	Some inaccurate data is recorded and was not updated as soon as practicable. Some submission data was inaccurate and was not corrected at the next available opportunity. Some corrections identified in the last audit have not been corrected. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	Controls are rated as moderate as the controls have been improved during the audit period but there is still room for improvement. The impact is assessed to be medium based on the impact on submission accuracy.		
Actions taken to resolve the issue		Completion date	Remedial action status
All ICPs with issues in this Audit have been logged and we are currently working to resolve these where possible. Immediate updates in Reconciliation washups were put in place in August 2021.		8/03/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All Audits, which included the most recent one, will have issues logs kept to identify all actions to be resolved.		8/03/2022	

Retailer responsibility for electricity conveyed - participant obligations		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 10.4 From: 1-Oct-21 To: 28-Feb-22	The Brighttr terms and conditions do not include consent for access for other participants. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because the requirement has not been met for customers serviced by Brighttr. The impact is low because all Brighttr customers are transferring to other traders. This is expected to be completed by March 2022.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are currently working with Brighttr for their exit of the electricity market.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Retailer responsibility for electricity conveyed - access to metering installations		
Non-compliance	Description	
Audit Ref: 2.6 With: Clause 10.7 From: 1-Oct-21 To: 28-Feb-22	The Brighter terms and conditions do not include consent for access for other participants. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because the requirement has not been met for customers serviced by Brighter. The impact is low because all Brighter customers are transferring to other traders. This is expected to be completed by March 2022.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are currently working with Brighter for their exit of the electricity market.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Trader contracts to permit assignment by the Authority		
Non-compliance	Description	
Audit Ref: 2.8 With: Clause 11.15B From: 1-Oct-21 To: 28-Feb-22	The Brighter terms and conditions do not include assignment by the Electricity Authority in the event of retailer default. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because the requirement has not been met for customers serviced by Brighter. The impact is low because all Brighter customers are transferring to other traders. This is expected to be completed by March 2022.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are currently working with Brighter for their exit of the electricity market.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 01-Apr-21</p> <p>To: 03-Dec-21</p>	<p><i>SELS</i></p> <p>One new connection was not certified within five business days of the initial electrical connection date.</p> <p>Two reconnections were not certified within five business days.</p> <p>Potential impact: Low</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>Controls are rated as moderate as they will mitigate risk to an acceptable level.</p> <p>The audit risk is low as only three ICPs were affected during the audit period.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates between April and August. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Salesforce view created for the Operations Team Lead to monitor all field services jobs. We also import the EDA file so we have visibility with late registry updates - this is used to provide ongoing coaching to Operations team members and refine processes.</p>	Ongoing	

Provision of information on dispute resolution scheme		
Non-compliance	Description	
Audit Ref: 2.19 With: Clause 11.30A From: 01-Oct-21 To: 28-Feb-22	Smart Energy (now Brighttr) does not include information on Utilities Disputes on its website or when responding to queries from customers. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as there is not a consistent approach. The audit risk rating is low because all brands achieved partial compliance and Brighttr customers are transferring to other traders. This is expected to be completed by March 2022.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are currently working with Brighttr for their exit of the electricity market.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Provision of information on electricity plan comparison site		
Non-compliance	Description	
Audit Ref: 2.20 With: Clause 11.30B From: 01-Oct-21 To: 28-Feb-22	Smart Energy (now BrightR) does not include information on Powerswitch on its website, its invoices, or in outbound communications regarding price changes or billing. 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 rated as strong overall as BrightR are exiting the market and all other parties are compliant. The audit risk rating is low because all brands achieved partial compliance and BrightR customers are transferring to other traders. This is expected to be completed by March 2022.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are currently working with BrightR for their exit of the electricity market.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Apr-21</p> <p>To: 19-Nov-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> two late updates to active status, and nine late updates to inactive status. <p><i>SELS</i></p> <ul style="list-style-type: none"> 16 late updates to active status for reconnections, 19 late updates to inactive status, 46 late trader updates, and 20 late ANZSIC code updates, at least one of which was not genuine and related to correction of other attributes. <p><i>SELX</i></p> <ul style="list-style-type: none"> one late trader update. <p>Potential impact: Low</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, the controls in place will mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the overall volume of backdated events was small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates between April and August. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Salesforce view created for the Operatons Team Lead to monitor all field services jobs. We also import the EDA file so we have visibility with late registry updates - this is used to provide ongoing coaching to Operations team members and refine processes.</p>	Ongoing	

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: 01-Apr-21</p> <p>To: 29-Nov-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> Ten late updates for new connections. <p><i>SELS</i></p> <ul style="list-style-type: none"> 118 late updates for new connections. ICP 0000163525CKB50 has a status date of 28/10/21 but should have 09/10/21. ICP 0120110020PNA29 has a status date of 16/03/21 but should have 15/03/21. <p>Potential impact: Low</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, the controls in place will mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as the controls in place are ensuring that ICPs are being made active as soon as possible and discrepancy reporting is ensuring any mismatches are being corrected as soon as possible therefore the impact on reconciliation is minimal.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates between April and August. Data quality during this period was significantly low however since an increase in staffing from mid-August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Salesforce view created for the Operations Team Lead to monitor all field services jobs. We also import the EDA file so we have visibility with late registry updates - this is used to provide ongoing coaching to Operations team members and refine processes.	Ongoing	

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-May-21</p> <p>To: 11-Feb-22</p>	<p><i>SELS</i></p> <p>Eight ICPs had incorrect ANZSIC codes assigned. All were corrected during the audit.</p> <p>Potential impact: Low</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>Controls are rated as moderate as there are no checks in place when white label customers are signed up. This is being addressed.</p> <p>The audit risk rating is low because there is no impact on settlement outcomes and a low impact on the Electricity Authority's reporting accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in proactively following up with our customer between April and August. Data quality during this period was significantly low however since an increase in staffing, this has allowed us to increase productivity and proactiveness in terms of following up on ANZSIC code responses. The Operations Team Lead is also acting as quality control.</p>	28/02/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Salesforce view created for the Operations Team Lead to monitor all 'Unknown' ANZIC codes – we contact the customer in order to correct the ANZIC code.</p> <p>A monthly process has been established to identify all ICPs with a residential ANZSIC code (as per the LIS file) and where the customer name or metering category suggests that the ANZSIC code is not appropriate - to contact the customer in order to correct the ANZSIC code. This process will be expanded to include different ANZSIC code checks over time</p>	Ongoing	

Management of "active" status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 04-Apr-21</p> <p>To: 03-Dec-21</p>	<p><i>SELS</i></p> <ul style="list-style-type: none"> Two SELS ICPs have more than one active customer. Two ICPs made active for the incorrect date of the sample of 45 ICPs sampled (18 new connection late updates, 15 new connections with potential first active date discrepancies, ten late reconnection active updates and two reconnected ICPs with expired certification). <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 have improved during the audit period with regular monitoring occurring to check status dates are applied correctly being reinstated. Controls are rated as moderate, as the processes are manual.</p> <p>The audit risk rating is low as the volume of ICPs with incorrect active status dates is small in comparison to the sample checked.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The ICPs with more than 1 active customer are Customer Networks and to change billing structures required new commercial arrangements. Progress on this has been made since the last audit and we hope to be able to change the billing structure to be compliant with the code by the end of April 2022.</p> <p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates between April and August. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	<p>30/4/2022</p> <p>31/03/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All new customer networks will be set up to be compliant with the code.	Ongoing	

<p>Salesforce view created for the Operatons Team Lead to monitor all field services jobs. We also import the EDA file so we have visibility with late registry updates - this is used to provide ongoing coaching to Operations team members and refine processes.</p>		
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Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 04-Apr-21</p> <p>To: 03-Dec-21</p>	<p><i>SIMP</i></p> <p>One incorrect inactive status update applied.</p> <p><i>SELS</i></p> <p>Three of the five ICPs set to the inactive vacant status were corrections to the first active date. The status events should have been reversed and taken straight to active.</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 have improved during the audit period with regular monitoring occurring to check status dates are applied correctly being reinstated. Controls are rated as moderate, as the processes are manual.</p> <p>The audit risk rating is low as the volume of ICPs with incorrect inactive statuses applied was small and had no impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. This resulted in long delays in registry status updates between April and August. Data quality during this period was significantly low however since an increase in staffing from mid-August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Salesforce view created for the Operations Team Lead to monitor all field services jobs. We also import the EDA file so we have visibility with late registry updates - this is used to provide ongoing coaching to Operations team members and refine processes.</p>	Ongoing	

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: 01-Mar-21</p> <p>To: 03-Dec-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> one transfer CS file contained incorrect last actual read date, and one transfer CS file contained the incorrect average daily kWh figure and the incorrect last read date. <p><i>SELS</i></p> <ul style="list-style-type: none"> two E2 breaches, one transfer CS file contained a negative average daily consumption figure, one transfer CS files contained an incorrect average daily kWh of the sample of five ICPs with a greater than 200kWh average daily consumption, two ICPs of the three transfer CS files checked were sent with the incorrect final read resulting in consumption being pushed to the gaining trader. <p><i>SELX</i></p> <ul style="list-style-type: none"> two ICPs of a sample of 13 transferred ICPs with the incorrect last read type of "E" <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 assessed to be moderate. The manual processing of CS files will always have the possibility of human error. Staff levels have been increased and controls are in place to mitigate to an acceptable level.</p> <p>The impact is assessed to be low based on the number of exceptions identified in the population examined and samples checked.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of the CS file generation process is scoped for development in 2022 and will go through the material change audit process. In the meantime additional resource was added to the operational team between June 2021 - October 2021. And the team have developed a spreadsheet to use	Ongoing	

<p>for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.</p>		
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Retailers must use same reading - standard switch		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 9 Schedule 11.3 From: 09-Aug-21 To: 09-Aug-21	<i>SELS</i> One AC breach. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as these are monitored closely. The impact is low as there was only one late AC file recorded and data accuracy was confirmed as compliant.	
Actions taken to resolve the issue	Completion date	Remedial action status
A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of the RR/AC file generation process is scoped for development in 2022 and will go through the material change audit process. In the meantime additional resource was added to the operational team between Aug/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.	Ongoing	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.7</p> <p>With: Clause 9 Schedule 11.3</p> <p>From: 19-Jul-21</p> <p>To: 20-Sep-21</p>	<p><i>SELS</i></p> <p>One NT file was issued more than two business days after pre-conditions were cleared of the 21 NT files sampled.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as the sending of NT files is monitored throughout the business day to ensure that these are sent to the registry within the required timeframe.</p> <p>The impact is low as only one incident of a late NT file was identified of the total of 21 NT files sampled. .</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We now have several people across the switching area as well as daily check ins and monitoring of Registry breach report to be compliant in this area. Automation of the NT file generation process is due for development in 2022 and will go through the material change audit process.</p>	Ongoing	

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 21-Jun-21</p> <p>To: 13-Jul-21</p>	<p><i>SELS</i></p> <p>Five T2 breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong. These files are monitored as part of BAU daily.</p> <p>The audit risk rating is low as the five late files were sent three to four days late.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Automation of the CS file generation process is scoped for development in 2022 and will go through the material change audit process.</p> <p>In the meantime additional resource was added to the operational team between August/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users incl Multipliers. Additional quality checks have also been added to the switching processes since the period in question.</p>	Ongoing	

Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 01-Mar-21</p> <p>To: 03-Dec-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> two of a sample of five ICPs checked with an average daily kWh value of greater than 200 kWh had an incorrect average daily consumption, five of a possible 14 switch move CS files contained the incorrect read type of "E", two switch move CS files contained the incorrect read type of "A", and one of a typical sample of three CS files checked found one with the incorrect average daily kWh figure. <p><i>SELS</i></p> <ul style="list-style-type: none"> three of a sample of 13 ICPs checked had an incorrect average daily consumption, and five of a possible 17 switch move CS files contained the incorrect read type of "E". <p><i>SELX</i></p> <ul style="list-style-type: none"> one of a sample of five ICPs checked had an incorrect average daily consumption, five of a possible 22 switch move CS files contained the incorrect read type of "E", and one switch move CS file contained the incorrect read type of "A". <p>Potential impact: Low</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 assessed to be moderate. The manual processing of CS files will always have the possibility of human error. Staff levels have been increased and controls are in place to mitigate to an acceptable level.</p> <p>The impact is assessed to be low based on the number of exceptions identified in the population examined and samples checked.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid Aug/Sept 2021, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Automation of the CS file generation process is scoped for development in 2022 and will go through the material change audit process.</p> <p>In the meantime additional resource was added to the operational team between August/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users. Additional quality checks have also been added to the switching processes since the period in question.</p>	Ongoing	

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: 09-Aug-21</p> <p>To: 23-Nov-21</p>	<p><i>SELS</i></p> <ul style="list-style-type: none"> eight RR breaches, and ICP 0003727038WF438 has the incorrect read type of "A" instead of "E" in Datahub and Madras. <p>Potential impact: Low</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 as BAU processes are bedded in and there is sufficient resource to manage switching.</p> <p>The impact is low as there was only one late AC file recorded and data accuracy was confirmed as compliant.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Automation of the CS file generation process is scoped for development in 2022 and will go through the material change audit process.</p> <p>In the meantime additional resource was added to the operational team between August/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users incl Multipliers. Additional quality checks have also been added to the switching processes since the period in question.</p>	Ongoing	

<p>are across the different NW codes and when they must be applied. Automation of the NW file generation process is scoped for development in 2022 and will go through the material change audit process.</p>		
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Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 01-Mar-21 To: 03-Dec-21</p>	<p><i>SIMP</i></p> <p>All five ICPs sampled of a possible 14 switch moves where the last actual read date is for the date before the switch event date were sent with the incorrect read type of "E".</p> <p>Two switch move ICPs with the incorrect read type of "A" applied due to human error.</p> <p><i>SELS</i></p> <p>All five ICPs sampled of a possible 23 transfer where the last actual read date is for the date before the switch event date were sent with the incorrect read type of "E".</p> <p>All five ICPs sampled of a possible 17 switch moves where the last actual read date is for the date before the switch event date were sent with the incorrect read type of "E".</p> <p>Two CS files of a sample of six checked sent with the incorrect last actual reads resulting in 79 kWh being pushed to the gaining trader and reconciled in the wrong period.</p> <p><i>SELX</i></p> <p>Two ICPs of a sample of 13 transferred ICPs with the incorrect last read type of "E"</p> <p>All five ICPs sampled of a possible 22 switch moves where the last actual read date is for the date before the switch event date were sent with the incorrect read type of "E".</p> <p>One switch move ICP with the incorrect read type of "A" applied due to human error.</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. The manual processing of CS files will always have the possibility of human error. Staff levels have been increased and controls are in place to mitigate to an acceptable level.</p> <p>The impact is assessed to be low, the difference between the applied and correct readings was small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August,	31/03/2022	Identified

<p>this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.</p>		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Automation of the CS file generation process is scoped for development in 2022 and will go through the material change audit process.</p> <p>In the meantime additional resource was added to the operational team between August/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users incl Multipliers. Additional quality checks have also been added to the switching processes since the period in question.</p>	<p>Ongoing</p>	

NHH meter reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Mar-21 To: 03-Dec-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> • five switch event readings of a possible 14 MI switches were incorrectly classified as estimates when they were actuals, and • two MI switches with an incorrectly classified switch event reading classified as actuals when they were estimates. <p><i>SELS</i></p> <ul style="list-style-type: none"> • five switch event readings of a possible 23 TR switches were incorrectly classified as estimates when they were actuals, • five switch event readings of a possible 17 MI switches were incorrectly classified as estimates when they were actuals, and • two ICPs of the three transfer CS files checked were sent with the incorrect final read resulting in consumption being pushed to the gaining trader. <p><i>SELX</i></p> <ul style="list-style-type: none"> • two TR switch event readings were incorrectly classified as estimates when they were actuals, • five switch event readings of a possible 22 MI switches were incorrectly classified as estimates when they were actuals, and • one MI switch event reading classified as an actual when it was an estimate. <p>Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate overall 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
A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of the CS file generation process is scoped for development in 2022 and will go through the	Ongoing	

<p>material change audit process.</p> <p>In the meantime additional resource was added to the operational team between August/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users incl Multipliers. Additional quality checks have also been added to the switching processes since the period in question.</p>		
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Interrogate meters once			
Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 01-Dec-21</p>	<p><i>SIMP</i></p> <p>One ICP unread during the period of supply, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p><i>SELS</i></p> <p>For 12 ICPs unread during the period of supply, the best endeavours requirements were not met, and exceptional circumstances did not exist.</p> <p>Potential impact: Low</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. There is a process in place, but compliance is not consistently achieved if the period of supply is short, or actual reads fail validation because they are lower than previous estimates.</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	Remedial action status
We are now receiving an automated report at the start of each month which allows us to easily identify unread sites.		5/03/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Analysis is performed each month and any unread meters and the no read reasons are sent to the White Label customers for investigation and to provide further information to aid with gaining a successful read on-going. Any updated information regarding the meter location or access instructions is updated and sent through to Wells.		5/03/2022	

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2</p> <p>From: 01-Mar-21 To: 03-Dec-21</p>	<p><i>SIMP</i></p> <ul style="list-style-type: none"> • five switch event readings of a possible 14 MI switches were incorrectly classified as estimates when they were actuals. • two switch event readings of a possible 14 MI switches were incorrectly classified as actuals when they were estimates. <p><i>SELS</i></p> <ul style="list-style-type: none"> • five switch event readings of a possible 23 TR switches were incorrectly classified as estimates when they were actuals, and • five switch event readings of a possible 17 MI switches were incorrectly classified as estimates when they were actuals. <p><i>SELX</i></p> <ul style="list-style-type: none"> • two TR switch event readings were incorrectly classified as estimates when they were actuals, and • five switch event readings of a possible 22 MI switches were incorrectly classified as estimates when they were actuals. <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate overall but there is room for improvement. 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
A large number of ICPs were switched out between April and August which put a lot of pressure on the limited number of people within the Operations Team. Data quality during this period was significantly low however since an increase in staffing from mid August, this has reduced the number of late updates. The Operations Team Lead is also acting as quality control.	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of the CS file generation process is scoped for development in 2022 and will go through the material change audit process. In the meantime additional resource was added to the	Ongoing	

<p>operational team between August/Sept 2021. And the team have developed a spreadsheet to use for bulk-switch outs which calculates the Estimated Daily Consumption & Last Actual Read Type for the users incl Multipliers. Additional quality checks have also been added to the switching processes since the period in question.</p>		
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Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Jun-20</p> <p>To: 01-Dec-21</p>	<p><i>SELS</i></p> <p>HHR estimate was not reasonable and not consistent with the ICPs consumption patterns for ICP 0000014504EACAF due to human error and a system vulnerability which has since been corrected.</p> <p>Estimates not replaced with actuals if the replacement file does not contain a register read.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate and will mitigate risk but there is room for improvement.</p> <p>The audit risk rating is rated as medium as the current estimation process have a direct impact on submission accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>There were two issues in the calculation of estimated HHR volumes for this ICP. Issue 1 was due to a user error where a reading was entered incorrectly and this was corrected in time for the revision.</p> <p>Issue 2 was due to a user error and a system vulnerability - a user incorrectly assigned volumes to a data stream twice; this had to be corrected by Axos in time for the revision and Axos also implemented development changes at the same time to ensure no other users can do this in future. 38 other data streams were identified as having been impacted by this issue at the time - and all were corrected as part of the exercise.</p>	31/08/2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
An additional check will be implemented in the Axos Datahub system to ensure that readings which fail validation are not used in HHR estimate creation. Other system vulnerability was addressed in August 2021.	30/09/2022

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Mar-21 To: 01-Dec-21	<i>SELS</i> AMI event logs are not routinely reviewed. Potential impact: Low Actual impact: Low Audit history: Three times previously 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 and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Simply Energy is working to implement a data warehouse solution which will automatically pull and store AMI event logs in tandem with Half Hour Volumes from our data management system to flag events which require investigation.	30/09/2022	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Mar-21 To: 01-Dec-21	<i>SELS</i> ICP days were not reported correctly one NSP. <i>SELX</i> ICP days were not reported correctly one NSP. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. Resource constraints have been addressed and the BAU checks are being carried out but due to the manual processes in place there is still the risk of human error. The impact is assessed to be low because corrected data will be washed up.	
Actions taken to resolve the issue		Completion date
All ICP Days discrepancies are investigated at each Reconciliation washup and since August 2021 all discrepancies are attempted to be resolved in that revision period		8/03/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Remedial action status		
Identified		

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 20-Oct-21 To: 01-Dec-21</p>	<p>Invalid permanent estimate readings were used in the calculation of volumes due to a code change made by AXOS resulting in an +/-1% submission variance. These inaccuracies will be washed up through the revision process.</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>EMS acting as an agent of Simply Energy submitted washup NHH volumes and ICP days for consumption months July 2021 (R3) and September 2021 (R1). There shouldn't have been volumes submitted on those months as Simply did not have any NHH customers since May 2021.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate as the controls have been improved during the audit period but there is still room for improvement.</p> <p>The impact is assessed to be medium based on the impact on submission accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The permanent estimate readings were cleared from our NHH DA system on 14/9/2021.	14/09/2021	Investigating
Incorrect data was removed by the Reconciliation Manager.	15/10/2021	
Preventative actions taken to ensure no further issues will occur	Completion date	
1. A safeguard was included in this code change to the logic used to send readings from the Datahub system to the NHH DA system which means any new read types will be automatically ignored by this process and a user will have to apply for another code change to include new read types in future. Controls in place managing this process will ensure a Material Change Audit is completed where required before any code changes are developed.	8/03/2022	

2. A review of processes has been done and we are working on removing the need for manual intervention, allowing more time before submission is due and allowing additional time for final checks by all parties.		
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Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Mar-21 To: 03-Dec-21	<i>SIMP, SELX and SELS</i> Some estimates are not replaced at R14. Permanent estimates not calculated correctly resulting in inaccurate apportionment in volumes. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are considered moderate. The processes have been strengthened during the audit period but there is still room for improvement. The impact is assessed to medium due to the impact on submission accuracy.	
Actions taken to resolve the issue	Completion date	Remedial action status
The permanent estimate readings were cleared from our NHH DA system on 14/9/2021.	14/09/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
A safeguard was included in this code change to the logic used to send readings from the Datahub system to the NHH DA system which means any new read types will be automatically ignored by this process and a user will have to apply for another code change to include new read types in future. Controls in place managing this process will ensure a Material Change Audit is completed where required before any code changes are developed.		

Historical estimates and forward estimates		
Non-compliance	Description	
Audit Ref: 12.10 With: Clause 3 Schedule 15.3 From: 01-Jun-20 To: 01-Dec-21	Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as moderate because historic and forward estimate is correctly identified most of the time. There is a medium impact on settlement because shape files are not used for the SFI and SBL profiles.	
Actions taken to resolve the issue	Completion date	Remedial action status
Profile shapes for UML and PV1 are now imported to Madras, this will in time label these as Historical Estimates.	30/11/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A material change audit is planned around unmetered load which will report all NHH Volumes as 100% HE.	30/04/2022	

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-20</p> <p>To: 30-Jun-21</p>	<p><i>SIMP, SELX and SELS</i></p> <p>Historic estimate targets were not met for all months and revisions.</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	
<p>Low</p>	<p>The controls are considered moderate because:</p> <ul style="list-style-type: none"> meter reading read attainment is high, and most of the forward estimate checked was historic estimate, which was mislabelled as forward estimate because shape files were unavailable for the ICP's profile. <p>The impact of the non-compliance is dependent on the accuracy of the estimates applied. There are sound estimation processes, therefore I have recorded the audit risk rating as low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Monthly reporting of ICPs with no read events has started which will ultimately reduce the number of ICPs using forward estimates.</p>	<p>31/01/2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Continuous work on no read events to reduce the number of ICPs not read at 12 months to nil.</p>	<p>9/03/2022</p>	