

## Compliance plan for Ecotricity RP 2022

Relevant information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Jul-21</p> <p>To: 28-Feb-22</p>	<p>Some registry discrepancies exist.</p> <p>Several scenarios leading to incorrect submission information.</p> <p>Inaccurate HHR data where ARC is the MEP due to having only one decimal place.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>Controls are rated as moderate at the time of the audit, because the validation reporting has improved, and submission issues are being identified and corrected in a more timely manner. Resolution of underlying issue is still taking longer to address.</p> <p>The impact is assessed to be medium because the kWh differences have been reduced through correction of the submission files.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Many of the non-compliance points raised in this audit and the actions we plan to take will help resolve registry discrepancies and incorrect submission information.</p> <p>We are unable to prevent ARC from supplying data to one decimal place though will discuss with them.</p>		End of Dec 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Many of the non-compliance points raised in this audit and the actions we plan to take will help resolve registry discrepancies and incorrect submission information.</p> <p>We are unable to prevent ARC from supplying data to one decimal place though will discuss with them.</p>		End of Dec 2022	

Electrical Connection of Point of Connection			
Non-compliance	Description		
Audit Ref: 2.11 With: Clause 10.33A From: 01-Jul-21 To: 28-Feb-22	ICP 0218136013LC96D was not certified within five business days of reconnection. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as weak because there isn't a process in place to request certification to occur. 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
The MEP has initiated contact with the other retailer to resolve the meter certification mix up and to arrange an appointment to have the meters replaced.		End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Develop a report with Robotron. Customer service set registry to Active, pass on to metering for recertification.		End of April 2023	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 01-Jul-21 To: 28-Feb-22	32 late updates to active status. 9 late updates to inactive status. 476 late trader updates. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	The controls are recorded as moderate. There is now a process to validate robotron*esales against a list file with history and other validation reports are being used.  The impact on settlement and participants is medium as 94% (30 out of 32) late active updates were for HHR submitted ICPs and the late updates to active has impacted the Reconciliation Managers calculation of seasonal shapes for all NHH retailers; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Validation reporting is in place to help identify and update the ICPs.		End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and get all work checked before breaching. We have also started creating activities to update the registry, rather than relying on an email chain to track.		End of May 2022	

Provision of information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 9 Schedule 11.1  From: 01-Jul-21 To: 28-Feb-22	19 late status updates to active for new connections. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement in terms of working with the MEPs and field service providers in improving paperwork delivery timeliness. 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 have a conversation with the relevant MEP/s regarding timeliness of delivering paperwork		End of May 2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Will be setting up the conversations with relevant MEP/s.		End of May 2022	

ANZSIC codes			
Non-compliance	Description		
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 01-Dec-20 To: 06-Jul-21	At least six incorrect ANZSIC codes. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	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
Since the audit, we believe we have fixed the codes.		End of April 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
Implement a more robust process to check ANZSIC codes against the registry and update more frequently.		End of May 2022	

Changes to unmetered load			
Non-compliance	Description		
Audit Ref: 3.7 With: Clause 9(1)(f) of Schedule 11.1  From: 01-Jul-21 To: 28-Feb-22	One ICP (0282046071LCEB5) with incorrect daily average kWh calculated and applied. Potential impact: Low Actual impact: Low Audit history: none Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	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
The daily kwh amount was corrected in the Registry and sync'd through to esales.		End of April 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
Set up a process with Robotron to automate the UML process including spotting mismatches and incorrect kwh amounts.		End of Dec 2022	

Management of "inactive" status			
Non-compliance	Description		
Audit Ref: 3.9 With: Clause 19 Schedule 11.1  From: 01-Jul-21 To: 28-Feb-22	One ICP (0000007594NTFE6) with incorrect inactive status event date. Potential impact: Low Actual impact: Low Audit history: none Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	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
Reversed incorrect status update and added correct update		28/04/2021	
Preventative actions taken to ensure no further issues will occur		Completion date	
We will add a process to create activities when sending a Reconnection. We have also reiterated to Teams to "Double check all data before pressing UPDATE on the registry".		End of June 2022	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 01-Jul-21 To: 28-Feb-22	Two CS breaches for late delivery of a CS file. Switch reads do not reflect the correct boundary read between traders in all cases. Incorrect average daily consumption for ICP 0006560352HBF75. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because there is no mechanism to ensure: <ul style="list-style-type: none"> <li>for HHR settled ICPs that the switch read aligns with the HHR consumption volumes submitted up to the switch date, and</li> <li>switch reads used do not relate to the ECOT period of responsibility</li> </ul> There is an impact on settlement and participants as this generates an additional volume of RR changes where other traders are able to detect these invalid switch reads, and it also increases UFE. The total number of ICPs and the total kWh is not large, therefore the risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Significant improvements within switching have been made from the Audit. A new person has undertaken the role and we believe they will have a finer eye for detail.	End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
When unable to send the CS through eSales, the switching team has been advised to send manually, to prevent breaches.	01/04/2022	



Retailers must use same reading - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Dec-20</p> <p>To: 27-Apr-21</p>	<p>Incorrect readings used for five of six ICPs sampled where Ecotricity settle as HHR, the CS read was estimated, and no adjustment was applied to the interval data to reflect the volume between the estimated switch read and the derived actual switch read from AMI data.</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		
<b>Low</b>	<p>The controls are recorded as moderate because as the gaining trader Ecotricity needs to ensure no volume is lost during the switch process where there is a change in submission type.</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
RR processes will be reviewed. We will be creating a data base for all calculated RRs so that there is an audit trail. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		On going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above comment		On going	

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3</p> <p>From: 01-Jul-21 To: 31-Jan-22</p>	<p>One AN breach relating to incorrect response code where a communicating AMI meter was present.</p> <p>One AN breach relating to incorrect event date populated.</p> <p>One CS breach.</p> <p>Five late AN files for switch moves.</p> <p>26 T2 breaches for switch moves.</p> <p>One CS breach</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk to an acceptable level most of the time. However resourcing levels and key personnel due annual leave, means the processes as are not as robust as they need to be consistently.</p> <p>The impact on other participants was minor because the files were only late by one or two days. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	

Losing trader determines a different date - switch move		
Non-compliance	Description	
Audit Ref: 4.9 With: Clause 10(2) Schedule 11.3  From: 01-Jul-21 To: 31-Jan-22	Two ET breaches for switch moves. Potential impact: Low Actual impact: Low Audit history: twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3  From: 01-Jul-21 To: 31-Jan-22	Switch reads do not reflect the correct boundary read between traders in all cases.  Incorrect daily kWh for three ICPs.  Potential impact: Medium  Actual impact: Medium  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because there is no mechanism to ensure: <ul style="list-style-type: none"> <li>for HHR settled ICPs that the switch read aligns with the HHR consumption volumes submitted up to the switch date, and</li> <li>switch read used do not relate to the ECOT period of responsibility</li> </ul> There is an impact on settlement and participants as this generates an additional volume of RR changes where other traders are able to detect these invalid switch reads, and it also increases UFE. The total number of ICPs and the total kWh is not large, therefore the risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
Audit Ref: 4.11 With: Clause 12 Schedule 11.3  From: 01-Jul-21 To: 31-Jan-22	Incorrect readings used for two ICPs where the read from the accepted RR was not used in robotron*esales.  Incorrect readings used for two ICPs where the ICP is settled as HHR.  One late AC file.  Potential impact: Low  Actual impact: Low  Audit history: Multiple  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate as when a proposed read change is accepted by the losing trader it is not always updated in the robotron*esales system. Closer monitoring of CS reads is required for HHR profiled ICPs to ensure the switch read is appropriate for both the switch and change in submission type.  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
Activities are now being created for all future RR's and will be closed off once the read is showing as the opening read.		End of May 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.		End of May 2022	

<b>Gaining trader to advise the registry manager - gaining trader switch</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.14 With: Clause 16 Schedule 11.3 From: 05-Feb-21 To: 05-Feb-21	One late HH CS file. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as strong as processes are robust around monitoring HH switches. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Nothing can be done to resolve the historic late HH CS file however, eSales now sends HH files meaning there is no longer manual intervention to help ensure files are processed within timeframes.		End of April 2022
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
eSales now sends HH files meaning there is no longer manual intervention to help ensure files are processed within timeframes.		End of April 2022
<b>Remedial action status</b>		
Identified		

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>	<p>Five NA breaches.</p> <p>One NW breach</p> <p>Two AW breaches</p> <p>One SR breach.</p> <p>One WR breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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
Nothing can be done to resolve the historic breaches, however, we will be hiring more staff which will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be hiring more staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	End of May 2022	

<b>Electricity conveyed &amp; notification by embedded generators</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.1 With: Clause 10.13, Clause 10.24 and 15.13  From: 01-Jul-21 To: 31-Jan-22	Submission had not occurred for 15 HHR ICPs and seven NHH ICPs with distributed generation and the RM was not notified of gifting.  Potential impact: Low  Actual impact: Low  Audit history: Multiple  Controls: Moderate  Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as moderate because although sound reporting is in place, resource constraints mean discrepancies are not resolved as soon as possible.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We are hiring additional staff in order to run through our report for this section and fully follow up on issues in a timely manner.	End May 2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We are hiring additional staff in order to run through our report for this section and fully follow up on issues in a timely manner.	End May 2022	



<b>NHH meter reading application</b>			
<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 6.7 With: Clause 6 Schedule 15.2  From: 01-Jul-21 To: 31-Jan-22	Reads applied for two profile changes were not reflective of the read/consumption from the last interrogation of the meter.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	In most cases profile and submission type changes are applied correctly. However, this process is manual, users are not consistently applying the process resulting in errors being applied and there is no mechanism to review these manual changes to ensure accuracy, therefore controls are considered moderate overall.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Any brought to our attention during the audit have been resolved.		End April 2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
We are looking into a process with Robotron to bulk upload closing and opening readings for meter changes, and an additional process to check the readings against the previous reads in the account.		End of Dec 2022	

<b>NHH meters interrogated annually</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Jul-21 To: 31-Dec-21	Best endeavours not met for two ICPs not read in the 12-month period. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Reporting is in place but is not being actioned consistently, therefore the controls are weak. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
We have contacted the customers involved to organise readings.		End of April 2022
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
We will hire more staff in order to complete more frequent checks and more intensive follow up with customers to organise readings.		End of May 2022
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Jan-21 To: 30-Apr-21	Two ICPs not read in the 4-month period. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Reporting is in place but is not being actioned consistently, therefore the controls are weak. 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 have contacted the customers involved to organise readings.	End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will hire more staff in order to do more frequent checks and more intensive follow up with customers to organise readings.	End of May 2022	

Correction of HHR metering information		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 19(2) Schedule 15.2  From: 01-Jul-21 To: 28-Feb-22	Estimation quality flag reporting is not monitored, which can lead to inaccurate corrections.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they deal with most scenarios accurately.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We will discuss with Robotron to implement a way to monitor these.		End of Dec 2022
Preventative actions taken to ensure no further issues will occur		Completion date
See above.		End of Dec 2022
Investigating		

Meter data used to derive volume information			
Non-compliance	Description		
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Jul-21 To: 31-Jan-22	AMS and EDMI's EIEP3 file format rounds trading period data to two decimal places. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate because data includes all decimal places provided for most ICPs. The impact is assessed to be low for the EIEP3 format, because a small number of ICPs are expected to be affected and the issue only affects the third decimal place under certain circumstances.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will have a conversation with both parties regarding the compliance issue around decimal places.		End of Dec 2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.		End of Dec 2022	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15 Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>	<p>HHR estimates across meter changes not including volume from removed meter between last midnight read and removal read.</p> <p>Reasonable endeavors not met where HHR estimates continue for long term non communicating AMI ICPs and the estimations are no longer able to be related to either historical consumption patterns or scaled to match volumes calculated between reads either side of the estimation gap.</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	
<b>Low</b>	<p>The controls are recorded as moderate because while estimates are created, they are not always the correct treatment for addressing non-communicating AMI ICPs.</p> <p>The impact is low because revised submission data is eventually provided once the submission type is backdated to NHH for historical periods. There are some impacts to seasonal shapes used for NHH submissions where these retrospective updates of submission types (HHR to NHH) occur.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
See below	End of Dec 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We need to discuss better controls with Robotron, ie., bulk uploading closing readings for meter changes. We are hiring more staff to ensure missing reads are followed up and completed to the best of our ability.	End of Dec 2022	

Electronic meter readings and estimated readings			
Non-compliance	Description		
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Jul-21 To: 31-Jan-22	Event logs not routinely checked across all AMI providers. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate because most validations occur. The impact on settlement and participants is minor; therefore, the audit risk rating is low. Phase failure, reverse power and meter critical events are individually emailed by MEPS.		
Actions taken to resolve the issue		Completion date	Remedial action status
See below		End of June 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
We will speak to the relevant MEPS to further understand the actions required for different events. We are planning to implement a data management system to identify events that require follow up.		End of June 2022	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Jul-21 To: 28-Feb-22	ICP Days file does not accurately reflect the reconciliation system. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as weak because it's not expected that this file will be edited. The main impact is on the scaling function, which will not be accurate; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Any manual adjustments to ICPDAYS following manual adjustments to AGGR, NHHVOLS arising from late changes to Robotron*eSales will be clearly logged.		End of May 2022
Preventative actions taken to ensure no further issues will occur		Completion date
ECOT will run the Robotron *eSales query [ICP Days Details] sufficient days ahead of submission to investigate ICPs with number of ICPDAYS different from the Registry and escalate these ICPS to the ECOT CS team for them to resolve the contract date and other root causes.		End of Dec 2022
Identified		



Electricity supplied information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.3 With: Clause 15.7  From: 01-Jul-20 To: 31-Jan-22	Precision of the AV120 (BILLED) submission file displays the volumes to zero decimal places where billed volumes from customers invoices has volumes to two decimal places.  Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement in terms of monitoring accuracy and completeness of this submission file as can be seen in the current volume difference between supplied and submitted.  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
Code will be adjusted to present 2 decimals in file.		End of June 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
Code will be adjusted to present 2 decimals in file.		End of June 2022	

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.4 With: Clause 15.8 From: 01-Jul-21 To: 30-Sep-21	Errors in HHRAGGS file between July and September 2021. Under submission of 54,165 kWh due to ICPs missing from aggs file. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	Controls are rated as weak because the approach to resolving differences between HHRVOLS/HHRAGGS and the registry LIS file is resulting in volume inaccuracies in the submission files. The efforts to resolve the differences should be directed in the ICP set ups prior to submission and where the discrepancy still exists allow the ICP Days scaling to account for these exceptions.  The impact is assessed to be medium because the kWh differences have reduced from the previous audit.		
Actions taken to resolve the issue		Completion date	Remedial action status
Multiple queries have been developed and added to eSales to help address the causes of missing/extra ICPs and incorrectly setup virtual meters.  In addition, some missing/extra ICPs were not being synchronised by eSales. Robotron has implemented a job into the system to address this.		End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Further work needs to be completed to identify root causes of incorrect ICP/meter set ups in a timely manner, communicate these to the relevant departments and follow up to ensure corrective action takes place.  Queries in other departments need to be run more regularly with sufficient time to correct any issues before submission files are due. With the hiring of additional staff in Metering and Switching, this will ensure this is completed consistently.  Further, the process to deal with late updates and adjust the HHRVOLS needs to be clearly documented to cover all scenarios. The steps to adjust volumes need to be strictly followed and completed with sufficient time before submission files are due.		End of Feb 2023	

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Jul-21 To: 31-Jan-22	Errors in both HHRVOLS and HHRAGGS file between July and September 2021. Under submission of 54,165 kWh due to ICPs missing from aggs file. Submission of 1,627 kWh yet to occur for two inactive NHH ICPs with consumption. Five incorrect UML daily kWh values used in submission. NHH generation kWh not submitted at the earliest opportunity. Potential impact: High Actual impact: Medium Audit history: Multiple Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	Controls are rated as moderate at the time of the audit, because the validation reporting has been improved and submission issues are being identified but further work is required to improve the timeliness of the corrections and ensure the correction is resolved at the source of the issue rather than manual adjustments made to submission files. The impact is assessed to be medium because the kWh differences are small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Further investigation/analysis needs to occur to identify and fix reasons for inaccuracies. In addition, processes will be reviewed and improved along with further training provided where needed.	End of Feb 2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Further investigation/analysis needs to occur to identify and fix reasons for inaccuracies. In addition, processes will be reviewed and improved along with further training provided where needed.	End of Feb 2023	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12  From: 01-Jul-21 To: 31-Jan-22	The most accurate data is not submitted in submission files when the following issues are identified: <ul style="list-style-type: none"> <li>• missing ICPS,</li> <li>• additional ICPS,</li> <li>• consumption on inactive ICPS, and</li> <li>• generation present at ICPS.</li> </ul> Potential impact: High Actual impact: Medium Audit history: Twice Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	Controls are rated as moderate at the time of the audit, because the validation reporting has been improved and submission issues are being identified and corrections are being applied in a more timely manner – however in the case of HHR corrections the approach is not compliant.  The impact is assessed to be medium because the kWh differences are small.	
Actions taken to resolve the issue	Completion date	Remedial action status
The ECOT Mkt Recon Team <b>has developed</b> an SQL query and process for the actual HHR interval data of missing or surplus HHR ICPS to manually adjust the HHRVOLS file instead of a flat shape.	End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The ECOT Mkt Recon Team will <b>from hereon query</b> for the actual HHR interval data of missing or surplus HHR ICPS to manually adjust the HHRVOLS file instead of a flat shape.	End of June 2022	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2  From: 01-Jul-21 To: 31-Jan-22	Estimates not all replaced by the 14-month revision. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as weak as issues preventing ICPs being correctly reported are still present at the 14-month revision and while there are manual attempts to adjust volumes to mitigate the impact of these errors on other participants, the controls need to focus on resolving the issue at root cause rather than manual adjustments on each wash up file.  The impact on settlement and participants is minor due to the efforts in applying manual adjustments to the wash up files; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Reporting for HE/FE exists which can be used to show ICP with FE date range in any recon month. Training will be scheduled. Further queries will be discussed to list by reason.	End of May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reporting for HE/FE exists which can be used to show ICP with FE date range in any recon month. Training will be scheduled. Further queries will be discussed to list by reason.	End of May 2022	

Reconciliation participants to prepare information		
Non-compliance	Description	
Audit Ref: 12.9 With: Clause 2 Schedule 15.3  From: 01-Jul-21 To: 31-Jan-22	Five of nine ICPs with unmetered load had inaccurate submission volumes due to incorrect daily kWh calculations.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate at the time of the audit, because the validation reporting has been improved with the exception of monitoring the accuracy of the Daily kWh value.  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
See below	End of Dec 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will have a conversation with Robotron to put in place a process to identify and check incorrect information relating to UMLs	End of Dec 2022	

Historical estimate process		
Non-compliance	Description	
Audit Ref: 12.11 With: Clauses 4 and 5 Schedule 15.3  From: 01-Jul-21 To: 31-Jan-22	Historic estimate calculations incorrect for one scenario. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because NHH volumes are being correctly calculated where correct seasonal shape mapping is in place: The audit risk rating is low as the incidence of incorrect HE being calculated is limited to only 30 NHH ICPs in Ecotricity's NHH submission volumes.	
Actions taken to resolve the issue	Completion date	Remedial action status
Code will be adjusted.	End of May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Code will be adjusted.	End of May 2022	

Compulsory meter reading after profile change			
Non-compliance	Description		
<p>Audit Ref: 12.13</p> <p>With: Clause 7 Schedule 15.3</p> <p>From: 01-Jul-21</p> <p>To: 31-Jan-22</p>	<p>Profile change for ICP 0000009128TEE4D was not completed using a validated meter reading or permanent estimate.</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		
<b>Low</b>	<p>The controls are recorded as moderate due to the manual nature of this process where users can make errors in selecting appropriate dates to undertake profile changes, and also ensuring the HHR data up to the profile change date is complete and accurate:</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
An opening reading was added to meter 219817358. A valid transition reading was already in place for 14/11/2019, sourced from the data file.		End of April 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff are reminded not to back-date profile changes so far. We are implementing a process to bulk upload meter change readings to ensure correct profiling and scaling, and also a process to check that these are correct against other readings. The profile will also be checked at the same time.		End of Dec 2022	



Historical estimate reporting to RM			
Non-compliance	Description		
Audit Ref: 13.3 With: Clause 10 Schedule 15.3  From: 01-Jul-21 To: 31-Jan-22	Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	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
Reporting for HE/FE exists which can be used to show ICP with FE date range in any recon month. More reporting will be discussed with team.		End of May 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting for HE/FE exists which can be used to show ICP with FE date range in any recon month. More reporting (e.g. missing start reads) will be discussed with team.		End of May 2022	