

Compliance plan for Ecotricity – 2020

Relevant information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Apr-20</p> <p>To: 21-Nov-20</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>Data from Metrix does not contain the first two intervals after daylight saving changes.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are recorded as weak because there is very limited validation reporting in place to identify and resolve registry and submission discrepancies.</p> <p>The impact on settlement and participants is significant; therefore, the audit risk rating is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Improve checks against the PR-010 report and regularly check the AC-020 to ensure information is correct in internal systems along with in the registry.</p> <p>Regarding the data with Metrix, ECOT will begin using the new Metrix file format in February which will stop this issue from occurring.</p>		End of May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Improve checks against the PR-010 report and regularly check the AC-020 to ensure information is correct in internal systems along with in the registry.</p> <p>Currently, ECOT is requesting the missing data from Metrix and manually inserting into the system to avoid using estimates where possible.</p>		End of May 2021	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 26-Apr-19 To: 26-Sep-19	ICP 0000166321TR5D9 not certified within five business days of reconnection. 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 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
A report is available for immediate use which will be implemented into an ongoing checking process.		End of February 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A report is available for immediate use which will be implemented into an ongoing checking process.		End of February 2021

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: Clause 10.36 From: 01-Apr-20 To: 10-Dec-20	MEP arrangements are not in place with WEL Networks or Nova. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
ECOT will follow up with the MEPs to put agreements into place.		End of March 2021
Preventative actions taken to ensure no further issues will occur		Completion date
ECOT will need to implement a system of tracking the MEPs we should have valid agreements with and monitoring them.		End of May 2021
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 01-Apr-20 To: 10-Dec-20	Some late status and trader updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because validation is ad-hoc and there are no validation reports available to monitor. The impact on settlement and participants is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Need to implement better reporting/validation checks by using the tools currently available to ensure information is updated in a timely manner.		End of February 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Need to implement better reporting/validation checks by using the tools currently available to ensure information is updated in a timely manner.		End of February 2021
		Remedial action status
		Identified

Provision of information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 01-Apr-20 To: 10-Dec-20	19 new connections not updated to the registry within 5 business days. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because 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
ECOT will implement processes to ensure that New Connections can be updated in a timely manner.		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
ECOT will implement processes to ensure that New Connections can be updated in a timely manner.		End of May 2021
		Identified

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 01-Apr-20 To: 10-Dec-20	11 incorrect ANZSIC codes. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because 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
ECOT will implement checking the AC-020 on a regular basis to identify where changes need to be made. In addition, a report will be implemented in internal systems to identify cases where the ANZSIC needs to be updated.		End of March 2021
Preventative actions taken to ensure no further issues will occur		Completion date
ECOT will implement checking the AC-020 on a regular basis to identify where changes need to be made. In addition, a report will be implemented in internal systems to identify cases where the ANZSIC needs to be updated.		End of March 2021
		Identified

Management of “active” status		
Non-compliance	Description	
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 06-Nov-19 To: 23-Nov-20	Incorrect status for ICP 1001152652CKABE. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because 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
A report is available for immediate use which will be implemented into an ongoing checking process.		End of February 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A report is available for immediate use which will be implemented into an ongoing checking process.		End of February 2021
		Identified

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 01-Apr-20</p> <p>To: 10-Dec-20</p>	<p>Incorrect use of the AA switch response code.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because Ecotricity sought advice and were told they could use a default code of AA.</p> <p>There is no impact because the presence of AMI metering is a registry field and the content of the AN file is not normally used as a source of information to confirm the presence of AMI.</p>	
Actions taken to resolve the issue		Completion date
This has already been corrected in the system and the AN response code is now defined based on the meter at the site.		Early December 2020
Preventative actions taken to ensure no further issues will occur		Completion date
This has already been corrected in the system and the AN response code is now defined based on the meter at the site.		Early December 2020
		Cleared

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-Apr-20</p> <p>To: 10-Dec-20</p>	<p>26 late CS files.</p> <p>Incorrect switch reading for one ICP.</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 recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Cases occurred during the migration of systems. The due date of when the files need to be sent is now recorded in the system and the switch breach report is used to ensure files are delivered on time.		End of December 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Cases occurred during the migration of systems. The due date of when the files need to be sent is now recorded in the system and the switch breach report is used to ensure files are delivered on time.		End of December 2020	

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-Apr-20</p> <p>To: 10-Dec-20</p>	<p>Four late RR files.</p> <p>One incorrect reading used for ICP 0005469465RND56.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because they have been improved since the last audit and they minimise 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
RR process for HHR has been automated and is supported by both Switching and Metering Teams. Additionally, ECOT need to find an efficient process to email the other retailer when sending a RR.		End of May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
RR process for HHR has been automated and is supported by both Switching and Metering Teams. Additionally, ECOT need to find an efficient process to email the other retailer when sending a RR.		End of May 2021	

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-20 To: 14-Aug-20</p>	<p>One late NT file.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they reduce 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
Likely occurred during the migration of systems. There is a process to identify any customers where a NT needs to be sent that needs to be followed by ECOT. Additional training will be provided to the appropriate Team.		End of February 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Likely occurred during the migration of systems. There is a process to identify any customers where a NT needs to be sent that needs to be followed by ECOT. Additional training will be provided to the appropriate Team.		End of February 2021
		Identified

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: 01-Apr-20</p> <p>To: 10-Dec-20</p>	<p>Incorrect use of the AA switch response code.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because Ecotricity sought advice and were told they could use a default code of AA.</p> <p>There is no impact because the presence of AMI metering is a registry field and the content of the AN file is not normally used as a source of information to confirm the presence of AMI.</p>	
Actions taken to resolve the issue		Completion date
This has already been corrected in the system and the AN response code is now defined based on the meter at the site.		Early December 2020
Preventative actions taken to ensure no further issues will occur		Completion date
This has already been corrected in the system and the AN response code is now defined based on the meter at the site.		Early December 2020
		Cleared

Losing trader determines a different date - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: Clause 10(2) Schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 10-Oct-20</p>	<p>Two AN files had event dates earlier than proposed.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Likely occurred during the migration of systems when some files were processed manually. In esales, the proposed date is used as default and we have not identified any issues here since using the system.		Completed upon migration in 2 nd half of 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Likely occurred during the migration of systems when some files were processed manually. In esales, the proposed date is used as default and we have not identified any issues here since using the system.		Completed upon migration in 2 nd half of 2020
		Cleared

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 01-Apr-20 To: 10-Dec-20	147 late CS files. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because 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
Cases occurred during the migration of systems. The due date of when the files needs to be sent is now recorded in the system and the switch breach report is used to ensure files are delivered on time.		End of December 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Cases occurred during the migration of systems. The due date of when the files needs to be sent is now recorded in the system and the switch breach report is used to ensure files are delivered on time.		End of December 2020
		Identified

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 01-Aug-20 To: 14-Aug-20	One late RR file. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they have been improved since the last audit and they minimise risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
RR process for HHR has been automated and is supported by both Switching and Metering Teams. Additionally, ECOT need to find an efficient process to email the other retailer when sending a RR.		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
RR process for HHR has been automated and is supported by both Switching and Metering Teams. Additionally, ECOT need to find an efficient process to email the other retailer when sending a RR.		End of May 2021
		Identified

Gaining trader to advise the registry manager - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.14</p> <p>With: Clause 16 Schedule 11.3</p> <p>From: 05-Jun-20 To: 09-Jul-20</p>	<p>One late CS file.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
As ECOT does not gain many of these sites, there was some confusion regarding the process. It has since been discussed and Switching are aware of how to handle these cases going forward. We have since had one other ICP which has been processed in esales and was handled correctly. The switch breach report will be used to identify these going forward.		Mid July 2020
Preventative actions taken to ensure no further issues will occur		Completion date
As ECOT does not gain many of these sites, there was some confusion regarding the process. It has since been discussed and Switching are aware of how to handle these cases going forward. We have since had one other ICP which has been processed in esales and was handled correctly. The switch breach report will be used to identify these going forward.		Mid July 2020
		Cleared

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-Apr-20</p> <p>To: 10-Dec-20</p>	<p>11 late NW files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Occurred while migrating systems. The switch breach report is currently being used to ensure files are delivered on time.		Completed upon migration in 2 nd half of 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Occurred while migrating systems. The switch breach report is currently being used to ensure files are delivered on time.		Completed upon migration in 2 nd half of 2020
		Identified

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24 and 15.13</p> <p>From: 16-Oct-20</p> <p>To: 30-Oct-20</p>	<p>Submission had not occurred for 42 ICPs with embedded generation and the RM was not notified of gifting.</p> <p>One ICP bridged during the audit period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because they need to be strengthened to identify ICPs with generation as soon as possible.</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
<p>A report is available for ECOT to monitor any ICPs with installation type "B" without an "EG" register.</p> <p>If a meter cannot be installed with an "EG" register (due to insufficient space, safety issues or customer refusal etc), the installation type needs to stay as "B". If solar panels or other generation is genuinely not installed, then the Distributor needs to change the installation type back to "L".</p> <p>We will need to implement a process for this to be monitored and actioned.</p>		End of May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A report is available for ECOT to monitor any ICPs with installation type "B" without an "EG" register.</p> <p>If a meter cannot be installed with an "EG" register (due to insufficient space, safety issues or customer refusal etc), the installation type needs to stay as "B". If solar panels or other generation is genuinely not installed, then the Distributor needs to change the installation type back to "L".</p> <p>We will need to implement a process for this to be monitored and actioned.</p>		End of May 2021	

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Apr-20 To: 20-Nov-20	Four ICPs not read in the 4-month period. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There are currently no processes in place to achieve compliance with this requirement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
There are two reports available for immediate use to identify unread NHH meters. These reports need to be included in a formalized process.		End of March 2021
Preventative actions taken to ensure no further issues will occur		Completion date
There are two reports available for immediate use to identify unread NHH meters. These reports need to be included in a formalized process.		End of March 2021

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Apr-20</p> <p>To: 24-Dec-20</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p>Under submission for 143 ICPs of 90,815 kWh.</p> <p>Over submission for 14 ICPs of 3,939 kWh.</p> <p>Under submission for inactive ICP with consumption of 3,883 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak because the validation reporting needs to be strengthened and there is a lot of manual intervention when creating files.</p> <p>The impact is assessed to be high because the kWh differences are quite significant.</p>	
Actions taken to resolve the issue		Completion date
<p>Improvements to comparing our internal system information to the PR-010 will be made to improve the accuracy of data in submissions.</p> <p>In addition, a report for INACTIVE ICPs with consumption is available for immediate use.</p>		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Improvements to comparing our internal system information to the PR-010 will be made to improve the accuracy of data in submissions.</p> <p>In addition, a report for INACTIVE ICPs with consumption is available for immediate use.</p>		End of May 2021
		Identified

Creation of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 06-Nov-19</p> <p>To: 21-Dec-20</p>	<p>Under submission for 143 ICPs of 90,815 kWh.</p> <p>Over submission for 14 ICPs of 3,939 kWh.</p> <p>Under submission for inactive ICP with consumption of 3,883 kWh.</p> <p>Incorrect HHR file for August 2020.</p> <p>No generation kWh submitted for 42 ICPs in April 2020.</p> <p>NHH generation kWh not submitted at the earliest opportunity.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as weak because the validation reporting needs to be strengthened and there is a lot of manual intervention when creating files.</p> <p>The impact is assessed to be high because the kWh differences are quite significant.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Improvements to comparing our internal system information to the PR-010 will be made to improve the accuracy of data in submissions.</p> <p>In addition, a report for INACTIVE ICPs with consumption is available for immediate use.</p>		End of May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Improvements to comparing our internal system information to the PR-010 will be made to improve the accuracy of data in submissions.</p> <p>In addition, a report for INACTIVE ICPs with consumption is available for immediate use.</p>		End of May 2021	

Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Apr-20</p> <p>To: 23-Dec-20</p>	<p>The most accurate data is not submitted in HHR vols and aggregates files when the following issues are identified:</p> <ul style="list-style-type: none"> • missing ICPs, • additional ICPs, • consumption on inactive ICPs, and • generation present at ICPs. <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as weak because the validation reporting needs to be strengthened and there is a lot of manual intervention when creating files.</p> <p>The impact is assessed to be high because the kWh differences are quite significant.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>In relation to ARC, ECOT is not able to gain more accurate information here.</p> <p>There are many points that have been raised throughout the audit that ECOT need to implement better processes for which will improve the accuracy of data submitted.</p>		End of May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>In relation to ARC, ECOT is not able to gain more accurate information here.</p> <p>There are many points that have been raised throughout the audit that ECOT need to implement better processes for which will improve the accuracy of data submitted.</p>		End of May 2021	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Feb-19 To: 23-Dec-20	Estimates not all replaced by the 14-month revision. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because 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
This is due to the system migration which occurred during the audit period. We expect to see improvement here now that the migration of systems is complete.		End of June 2021
Preventative actions taken to ensure no further issues will occur		Completion date
This is due to the system migration which occurred during the audit period. We expect to see improvement here now that the migration of systems is complete.		End of June 2021
		Identified

Historical estimate process		
Non-compliance	Description	
Audit Ref: 12.11 With: Clause 4 and 5 Schedule 15.3 From: 01-Sep-20 To: 31-Dec-20	Incorrect HE calculation for one HE scenario from September to December 2020. 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 HE logic can be changed without Ecotricity approval or testing. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We are aware of the issue which Robotron resolved in December 2020.		December 2020
Preventative actions taken to ensure no further issues will occur		Completion date
We are aware of the issue which Robotron resolved in December 2020.		December 2020
		Post audit comment by auditor: I've recorded this as identified rather than cleared until re-testing has occurred for all HE scenarios.

Historical estimate reporting to RM			
Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: Clause 10 Schedule 15.3</p> <p>From: 01-Feb-19</p> <p>To: 31-Mar-20</p>	<p>58 NSPs did not meet the 80% threshold for March 2020.</p> <p>14 NSPs did not meet the 100% threshold for February 2019.</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 recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Some HE dates are flagged as FE. We are aware of the issue and will work with Robotron to have this resolved.		End of March 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Some HE dates are flagged as FE. We are aware of the issue and will work with Robotron to have this resolved.		End of March 2021	