

# Compliance plan for ForOurGood – 2021

Relevant information			
Non-compliance		Description	
<p>Audit Ref: 2.1 With: Clause 11.2</p> <p>From: 23-Feb-21 To: 24-Jun-21</p>		<p>ICP 0000143911UNC1E had consumption during a period which was expected to be inactive, and the status was corrected to active for the affected period during the audit.</p> <p>ICP 0268714120LCD0A was updated to inactive from 26 February 2021 but should have been inactive from 23 February 2021, and the status date has not been corrected because the ICP switched out.</p> <p>IntelliHub estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>Controls are moderate overall because:</p> <ul style="list-style-type: none"> <li>• IntelliHub estimates because complete and accurate data is provided most of the time.</li> <li>• There are processes in place to identify and report inactive consumption, and status corrections are processed as necessary.</li> </ul> <p>The impact is low because:</p> <ul style="list-style-type: none"> <li>• Inactive consumption is submitted, and the incorrect status has been corrected.</li> <li>• There will only be small quantities of estimates still existing after the catch-up window.</li> </ul>	
Actions taken to resolve the issue		Completion date	Remedial action status
Additional Process Checks put in place to reduce risk incorrect statuses. Volume will continue to be submitted for both Active and Inactive sites to ensure submissions are correct		18/08/2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
As Above	18/08/2021	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 04-Nov-20 To: 04-Jun-21	Three late updates to active status for reconnections. Four late updates to inactive status for disconnections. 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 most updates are made on time. The audit risk rating is low because the impact on settlement and participants is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Increased Monitoring of Completion notifications for disconnections and reconnections, plus increased monitoring of metering data to identify changes in volume for disconnected sites		30/09/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Improved process for confirming completion of disconnections and reconnections to ensure updates made within required timeframes		18/08/2021	

Management of "inactive" status			
Non-compliance	Description		
Audit Ref: 3.9 With: Clause 19 Schedule 11.1  From: 27-Apr-21 To: 24-Jun-21	ICP 0000143911UNC1E had consumption during a period which was expected to be inactive, and the status was corrected to active for the affected period during the audit.  Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are strong because there are process in place to identify and report inactive consumption. Status corrections are processed as necessary.  The impact is low because inactive consumption is submitted, and the incorrect status has been corrected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Improved Process and increased frequency of inactive with Consumption Checks		18/08/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Improved Process and increased frequency of inactive with Consumption Checks		18/08/2021	

Losing trader response to switch request and event dates - standard switch	
Non-compliance	Description
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3  From: 24-Oct-19 To: 28-Mar-20	Incorrect response code in 11 AN files.  Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as strong because they have recently been improved to ensure correct codes are used.</p> <p>There is no impact on other parties because this field in the AN file is seldom used. The registry data is more relevant and is used by most traders. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Additional Training given and process documentation for manual AN files has been updated to ensure rules for Response codes is clear		21/05/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AN files automated where possible, plus improved process for manual AN's when these are required		21/05/2020	

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: 24-Jul-20</p> <p>To: 15-Jun-21</p>	<p>22 E2 breaches.</p> <p>Five transfer CS files contained some incorrect information.</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 rated as moderate:</p> <ul style="list-style-type: none"> <li>errors were only identified for 5/340 transfer switch CS files, and</li> <li>all the late CS files were sent one business day late, due to an unusually high volume of ICP losses during a period of high spot prices.</li> </ul> <p>The impact is low, because the late files were one business day late and the errors in CS files either did not affect settlement or had a minor impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This was primarily related to dropping a large number of customer due to the impacts of extended periods of high spot prices. Should this sort of event happen again in the future, additional resources will be used to completed these on time using existing processes that are robust and compliant		18/08/2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Appropriate resources will be assigned to complete CS files if this sort of situation arises again in the future		

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: 10(1) Schedule 11.3</p> <p>From: 10-Jun-20</p> <p>To: 04-Jun-21</p>	<p>One AN contained the AA response code but should have had AD.</p> <p>Two ANs had proposed event dates before the gaining trader's proposed event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are moderate, because the process to generate ANs is manual and only a small number of data entry errors were identified. If processes are correctly followed compliant event dates and response codes will be applied.</p> <p>The audit risk rating is low because impact on settlement and participants is minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Confirmed existing processes are suitable and confirmed criteria for AN responses and timings with team	18/08/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Confirmed existing processes are suitable and confirmed criteria for AN responses and timings with team	18/08/2021	

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3  From: 21-Jul-20 To: 01-Jun-21	Two E2 breaches. Five switch move CS files contained some incorrect information. 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, errors were only identified for 5/180 switch move CS files, and two E2 breaches were identified. The impact is low, because the errors in CS files either did not affect settlement or had a minor impact on settlement, and the E2 breaches had a minor impact on the other trader and customer.	
Actions taken to resolve the issue		Completion date
CS File Checklist updated with additional Check to complete before sending CS Files		31/08/2021
Preventative actions taken to ensure no further issues will occur		Completion date
CS File Checklist updated with additional Check to complete before sending CS Files		31/08/2021
Remedial action status		
Identified		

Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
Audit Ref: 4.11 With: Clause 12 Schedule 11.3  From: 16-Jun-20 To: 15-Jun-21	Two RR breaches. The RR for 0000812321TUECE (09/06/20) was not supported by two actual readings. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong, because very few files were late or contained errors. The audit risk rating is low because impact on settlement and participants is minor.	
Actions taken to resolve the issue		Completion date
RR Creation routine updated to ensure HHR data and reads are Actual before creating RR		30/09/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Processes updated to confirm RR values are based on 2 actual Reads		18/08/2021

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3  From: 18-Jan-21 To: 01-Apr-21	Two NA breaches. Two NWs had the DF reason code applied but should have had CE. 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 moderate as most files were processed accurately and on time. The impact on other participants is low.	
Actions taken to resolve the issue		Completion date
Process Updated		30/09/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Additional steps added to Process to validate NW reasons before sending		31/09/2021

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3  From: 13-Jul-20 To: 04-Aug-20	Three CS files did not contain readings for the end of FOGY's last day of supply. 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 rated as moderate, errors were only identified for 3/520 CS files. The impact is low, because the errors had a minor kWh impact with a maximum difference of 43 kWh.	
Actions taken to resolve the issue		Completion date
CS Creation Routine enhanced to automate additional date checks and provide last actual date when Estimates provided		31/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Processes updated to check last actual vs switch read prior to sending CS file		18/08/2021

Identification of readings	
Non-compliance	Description
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2  From: 04-Aug-20 To: 21-Sep-20	Two CS files had estimated readings classified as actual readings. 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 rated as moderate because a small number of errors were identified. The impact is low, because the errors in CS files either did not affect settlement.



Actions taken to resolve the issue	Completion date	Remedial action status
Same as Clause 21 Schedule 11.3 issue - CS Creation Routine enhanced to automate additional date checks and provide last actual date when Estimates provided	31/10/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Same as Clause 21 Schedule 11.3 issue - Processes updated to check last actual vs switch read prior to sending CS file	18/08/2021	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 of part 15 From: 28-Jan-19 To: 10-Aug-21	HHR aggregates file does not contain electricity supplied information. Potential impact: None Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	FOGY is reporting submission volumes at ICP level as expected by the reconciliation manager.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY continues to provide the data in the way the RM requires, and will work with the EA to resolve this Rule Conflict	30/09/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY continues to provide the data in the way the RM requires, and will work with the EA to resolve this Rule Conflict	30/09/2021	