

Compliance plan for Nova Reconciliation Participant Audit– 2021

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-19</p> <p>To: 15-Jan-21</p>	<p>TODD</p> <p>Some inaccurate data was not corrected as soon as practicable.</p> <p>Profile discrepancy on the day of meter change for upgrades and downgrades.</p> <p>Inaccurate submission for ARC Innovations HHR metering.</p> <p>HNET</p> <p>Under submission of 1,176.73 kWh for July 19 due to inadequate validation.</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>Controls are rated as strong as they are sufficient to mitigate risk most of the time. The HNET validation controls require strengthening.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is low. Where statuses are incorrect, the reconciliation process ensures that all consumption is reported. Status inaccuracies can have a minor impact on ICP days submissions.</p> <p>The HNET validation issue resulted in under submission outside the 14-month revision period.</p>	
Actions taken to resolve the issue		Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Some inaccurate data was not corrected as soon as practicable.</p> <p>Item 1.</p> <p>ICPs 0000042252UN4B9, 0000250349EN2FC and 0000004812UN243</p> <ul style="list-style-type: none"> Several backdated events were updated/corrected Improvements to the data integrity processes have been made and we will continue to focus on timely and accurate updates/corrections 		<p>On-going</p> <p>Identified</p>

<p>Item 3.</p> <p>Four ICPs incorrect status event dates – not corrected via validation processes</p> <ul style="list-style-type: none"> • Refer 3.8 <p>Item 5.</p> <p>Incorrect Profiles</p> <ul style="list-style-type: none"> • TODD has set up an automated process to align the profile in Orion with the registry – March 2021 • Additionally, discrepancy reporting has been updated to highlight where profiles don't align with submission types – March 2021 <p>Profile discrepancy on the day of meter change for upgrades and downgrades.</p> <ul style="list-style-type: none"> • Nova will continue current submission processes around upgrades/downgrades. This is a technical non-compliance that arises due to the registry being unable to reflect an ICP being NHH & HHR on the same day. • As noted by the auditor there is no material impact on reconciliation. <p>Item 6.</p> <p>Embedded generation present with RPS profile</p> <ul style="list-style-type: none"> • Refer 6.1 <p>Item 9 & 13.</p> <p>ANZSIC</p> <ul style="list-style-type: none"> • Refer 3.6 <p>Item 16.</p> <p>ICPs incorrect shared unmetered load</p> <ul style="list-style-type: none"> • Refer 5.1 <p>Item 18.</p> <p>417 active ICPs with ARC Innovations meters HHR settled</p> <ul style="list-style-type: none"> • As noted by the auditor the affected meters do not have multipliers and have the highest metering category of 1, so the impact is expected to be minimal. • Vector is in the process of replacing all Arc meters 		
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<ul style="list-style-type: none"> Nova supports an industry wide approach that considers the costs and benefits of the most appropriate response to this situation Nova seek EA clarification and guidance on this issue <p>ICP 0000120785ENC01</p> <ul style="list-style-type: none"> The read was entered incorrectly by a team member, the read has been “misread” and a correction to the read date completed <p>ICP 0000105283UNE27</p> <ul style="list-style-type: none"> Refer 2.11 <p>ICP: 0000000538CPA9C</p> <ul style="list-style-type: none"> The ICP had a disconnection read entered incorrectly to our Orion system in error. <ul style="list-style-type: none"> Corrected May 2021 <p>ICP: 0000026059WE8F3</p> <ul style="list-style-type: none"> Correction has not occurred due to the affected period already exceeding the R14 Final Washup cycle <p>28 ICPs had HHR profile without HHR submission flag</p> <ul style="list-style-type: none"> Refer 12.9 <p>ICP: 1000012524BP6C4</p> <ul style="list-style-type: none"> Correction completed May 2021 <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Under submission of 1,176.73 kWh for July 19 due to inadequate validation ICP 0000014236KP043 Revision Variances</p> <ul style="list-style-type: none"> HNET ran the July 2019 R14 report in Sep 20, this ICP was detected in some way in the validation process and HE volume was manually calculated with 2 actual reads. HNET used 2 actual reads but didn't pick up all actual reads in the middle of the July 2019 (5th, 19th & 24th July) which caused a revision variance for the month. HNET have confirmed that there is no revision variance in Aug and Sep 2019 for the ICP. HNET no longer query and review ICP days in any revision as we have already fixed the ICP days error in Jan 2021. 		
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<ul style="list-style-type: none"> ○ As discussed during the audit, an identified issue with ICP days when there is a trader event on the date the meter was changed, and it was fixed 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> • Detailed outcomes are covered in the applicable sections of the audit document <p>HNET</p> <ul style="list-style-type: none"> • HNET will continue to eliminate human involved validation process. 	On-going	

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 01-Feb-20</p> <p>To: 15-Jan-21</p>	<p>TODD</p> <p>Three late certifications for new connections.</p> <p>58 ICPs with late or no current certification for reconnections.</p> <p>Meter unbridged but not recertified for ICP 0000105283UNE27.</p> <p>HNET</p> <p>Two reconnections with expired certification.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice 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 recorded as strong. Processes are in place to identify metering certification issues and replace affected meters.</p> <p>The impact on settlement is recorded as minor because installations with expired or interim certification may be less accurate than certified metering installations.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted</p> <p>Item 1. Four late certifications for new connections</p> <ul style="list-style-type: none"> Nova have processes in place to identify and instigate actions to support certification and recertification on TODD traded ICPs. <p>Item 2. 58 ICPs late or no current certification</p> <ul style="list-style-type: none"> Nova continue to work with MEPs on deployment program(s), BAU field jobs, turn downs due to additional electrical work required and consumer contact challenges etc These challenges are on-going across the industry <p>Item 3. ICP 0000105283UNE27 unbridged but not certified</p> <ul style="list-style-type: none"> When the bridging was identified, unbridge occurred but no recertification at point of reconnection was able to be completed. 		TODD on-going	Identified

<ul style="list-style-type: none"> Nova employee did not follow required actions for meter re-certification as per the documented process which caused delays <ul style="list-style-type: none"> Certified November 2020 <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted</p> <p>Two reconnections with expired certification</p> <ul style="list-style-type: none"> Process improvement implemented to send a reconnection and meter re-certification request to MEPs Our robotic process includes review of meter certification expiry date and send the right order to submit. 0000130394UN648 <ul style="list-style-type: none"> Meter board in shared hallway. On-going work to liaise with all businesses to have metering recertified 0000111339UN961 <ul style="list-style-type: none"> Switched 	<p>HNET on-going & April 2021</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD & HNET</p> <ul style="list-style-type: none"> Non-compliance will continue to occur as certifications continue to expire TODD & HNET will continue to work with MEPs to improve and/or meet the code timeframes 	<p>On-going</p>	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Feb-20</p> <p>To: 15-Jan-21</p>	<p>TODD, HNET and WISE</p> <p>Some registry information was not updated within 5 business days of the event.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls over the timeliness and accuracy of status and trader updates are strong. The late updates were mainly caused by delays in receiving paperwork, or corrections where Nova had confirmed the initial update was incorrect.</p> <p>HNET and WISE controls are robust, and errors are identified and corrected by both HNET and WISE as soon as possible.</p> <p>The audit risk rating is low as the vast majority of updates to the registry occur within the required timeframe.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD – HNET -WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Some registry information was not updated within 5 business days of the event.</p> <ul style="list-style-type: none"> TODD, HNET & Wise continue to display on-going commitment to timely status updates which is reflected in the compliance results. In instances where backdated corrections are made, we elect to provide complete and accurate information and acknowledge this creates contention with Clause 10 Schedule 11.1. 		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
<p>TODD, HNET & WISE</p> <ul style="list-style-type: none"> On-going work with our industry stakeholders to improve compliance time frames and where required we elect to provide complete and accurate information over timeliness. The focus will continue to be on accuracy of event dates and complete and accurate information. 		On-going	

Provision of information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 01-Feb-20</p> <p>To:21-Jan-21</p>	<p>TODD</p> <p>55 late updates to active status for new connections.</p> <p>Four incorrect first active dates.</p> <p>HNET</p> <p>Late registry update for one new connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls over the timeliness and accuracy of new connection status updates are strong. TODD has robust controls in place to mitigate this risk.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>55 late updated to active status for new connections</p> <ul style="list-style-type: none"> Timely updates to the registry continue to remain a focus. Nova focus on achieving a high level of compliance with timely updates and on-going strong relationships with stakeholders to influence improved outcomes. <p>4 incorrect first active dates</p> <ul style="list-style-type: none"> Refer 3.8 <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Late registry update for one new connection.</p> <ul style="list-style-type: none"> ICP: 1002065428UN9E3 The new connection was completed late Nov 2019 and we contacted the MEP multiple times to gain the 		On-going	Identified

<p>completed paperwork to confirm the meter install date and other metering information. The detail was provided Feb 2020.</p> <ul style="list-style-type: none"> • HNET actively monitor and engage with our stakeholders to gain complete and accurate information in a timely manner. 		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD & HNET</p> <ul style="list-style-type: none"> • Continue to actively work on updating status' in a timely manner. 	<p>On-going</p>	

ANZSIC codes			
Non-compliance		Description	
Audit Ref: 3.6 With: 9 (1(k) Schedule 11.1 From: 01-Feb-20 To:21-Jan-21		TODD 17 ICPs had incorrect ANZSIC codes applied. All have been corrected. HNET Two incorrect ANZSIC codes. Potential impact: None Actual impact: None Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as moderate as they mitigate risk most of the time. I make a recommendation above that would move the controls to strong if adopted. The audit risk rating is low this has no direct impact on submission accuracy.	
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. 17 ICPs had incorrect ANZSIC codes applied. All have been corrected <ul style="list-style-type: none"> 17 ICPs with incorrect ANZIC codes <ul style="list-style-type: none"> See recommendation HNET Response: Non-Compliance accepted. Two incorrect ANZSIC codes. <ul style="list-style-type: none"> 2 incorrect ANSIC codes applied due to human error <ul style="list-style-type: none"> Corrections completed May 2021 		TODD on-going HNET May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD & HNET <ul style="list-style-type: none"> Nova recognises the importance on ensuring correct and accurate ANZSIC codes are applied and reviewed regularly. See recommendation Refresher training provided 		On-going	

Management of “active” status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: 17 Schedule 11.1</p> <p>From: 04-Feb-20</p> <p>To: 05-Oct-20</p>	<p>TODD</p> <p>Four ICPs with the incorrect first active date.</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 rated as strong, as the controls in place will mitigate risk to an acceptable level. One ICP was not corrected because the ICP later switched out to another trader.</p> <p>The audit risk rating is low based on the number and nature of the discrepancies found.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Four ICPs with the incorrect first active date.</p> <ul style="list-style-type: none"> • Data integrity reporting identified the discrepancies as expected. • The documented process was not followed <ul style="list-style-type: none"> ○ Team member no longer Nova employee 			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> • Refresher training on process and obligations to be delivered 		July 2021	

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Feb-20 To:21-Jan-21</p>	<p>WISE</p> <p>Disconnected ICPs not changed to inactive status unless they are disconnected for more than three days.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Twice</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, because most ICPs have the correct status and event dates recorded, but there is room for improvement.</p> <p>The impact was assessed to be low. There is no impact on volume submissions, and a very minor impact on ICP days submissions.</p>	
Actions taken to resolve the issue		Completion date
<p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Disconnected ICPs not changed to inactive status unless they are disconnected for more than three days.</p> <ul style="list-style-type: none"> WISE will conduct a review of the registry status update processes with the intent to update the process to change the ICP status to inactive within +1 day of disconnection Updated process to change ICP status to inactive within +1 day of disconnection to be delivered by 30 May 2021 		May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<ul style="list-style-type: none"> Our focus will continue to be on accuracy of event dates and complete and accurate information. We will monitor disconnected ICPs on an on-going basis and where required, look for opportunities for improvements. 		On-going
		Identified

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clause 3 and 4 Schedule 11.3</p> <p>From: 07-Jan-21</p> <p>To: 08-Jan-21</p>	<p>TODD</p> <p>One incorrect AN code sent.</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 rated moderate as the logic is working correctly in most instances.</p> <p>The audit risk rating is low as this information is also available to the gaining trader directly from the registry.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>One incorrect AN code sent.</p> <ul style="list-style-type: none"> ICP: 0001040200TGB92 <ul style="list-style-type: none"> Refer 4.13 		Q3
Preventative actions taken to ensure no further issues will occur		Completion date
<ul style="list-style-type: none"> Refer 4.13 		
		Identified

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-Feb-20 To: 15-Jan-21</p>	<p>TODD</p> <p>CS average daily consumption is based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded.</p> <p>ICP 0002703012HB458 was sent with zero incorrectly and should have been sent as 2 kW.</p> <p>WISE</p> <p>6 late CS files.</p> <p>Incorrect calculation of average daily consumption</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 mitigate risk most of the time, but the average daily consumption is not calculated as described in the Registry Functional Specification for TODD or WISE.</p> <p>The audit risk rating is assessed to be low as the average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>CS average daily consumption is based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded.</p> <ul style="list-style-type: none"> Refer 4.10 <p>ICP 0002703012HB458 was sent with zero incorrectly and should have been sent as 2 kW</p> <ul style="list-style-type: none"> Refer CS average daily consumption non-compliance 4.10 <p>WISE</p> <p>Response:</p>		<p>TODD Q4</p> <p>WISE Q2 2021</p>	Identified

<p>Non-Compliance accepted.</p> <p>6 late CS files.</p> <ul style="list-style-type: none"> The late CS files is a result of backdated switching, and since WISE no longer contacts customers for switching WISE has not backdated switching since November 2020 <p>Incorrect calculation of average daily consumption</p> <ul style="list-style-type: none"> WISE will change the process to calculate and send the average daily consumption based on the last two actual readings at the time of sending the CS. 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> As above <p>WISE</p> <ul style="list-style-type: none"> As above 		

Retailers must use same reading - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 6(1) and 6A Schedule 11.3</p> <p>From: 21-Apr-20</p> <p>To: 11-Jan-21</p>	<p>TODD</p> <p>Six late RR files for transfer switches.</p> <p>HNET</p> <p>One late RR file.</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 over the read renegotiation process are strong. COVID 19 delayed the gaining of reads during 2020.</p> <p>The audit risk rating is low. The volume of late RR files was small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Six late RR files for Transfer switches</p> <ul style="list-style-type: none"> As discussed during Audit, covid-19 impacts caused the delays. <ul style="list-style-type: none"> Our controls are strong, the impact is low <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>One late RR file.</p> <ul style="list-style-type: none"> One late RR file due to consumer being off-shore and access not being able to be gained 			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD & HNET</p> <ul style="list-style-type: none"> Nova will continue with on-going refresher training, review processes and where possible identify improvement opportunities 			

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: 01-Feb-20</p> <p>To: 11-Jan-21</p>	<p>TODD</p> <p>Three incorrect AN codes sent.</p> <p>HNET</p> <p>Two ICPs with proposed or actual switch dates earlier than those specified by the gaining trader.</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		
Low	<p>The controls are rated moderate as the logic is working correctly in most instances.</p> <p>The audit risk rating is low as this information is also available to the gaining trader directly from the registry.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Three incorrect AN codes sent.</p> <ul style="list-style-type: none"> Refer 4.13 <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Two ICPs with proposed or actual switch dates earlier than those specified by the gaining trader.</p> <ul style="list-style-type: none"> ICP 0201274868LC76C: When the ICP is occupied, HNET sets the AN expected transfer date as NT event date + 3 days. GEOL sent us NTMI for 24.01.2020 which is invalid. <ul style="list-style-type: none"> We sent a NW to withdraw the switching. ICP 0000241533UN236: When the ICP is occupied, HNET sets the AN expected transfer date as NT event date + 3 days. However, this was backdated switching even though it was a occupied premise at the time we received the NT. 			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> • Refer 4.13 <p>HNET</p> <ul style="list-style-type: none"> • HNET changed our robotic process to set a proposed date within the correct timeframe - AN Expected Transfer Date is earlier than the NT Proposed Transfer Date; OR AN Expected Transfer Date is more than 10 business days after NT arrival date. 	HNET April 2021	

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-Feb-20 To: 15-Jan-21</p>	<p>TODD</p> <p>CS average daily consumption is based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded.</p> <p>One read was sent as an actual for the event date 26/03/20 but the read should have been sent as an estimate with the last read date of 23/03/20 for ICP 0042251124PC489.</p> <p>An incorrect last actual read date and read were recorded for ICP 1001276348LCA17 (12/09/20) from the sample of five ICPs checked.</p> <p>WISE</p> <p>Calculation methodology for average daily consumption not compliant.</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>Controls are rated as moderate overall as there are robust checks in place to identify most discrepancies.</p> <p>The audit risk rating is assessed to be low as the average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>CS average daily consumption</p> <ul style="list-style-type: none"> Requirements were developed to align with the industry specifications in 2020 This was anticipated to be delivered by Q4 2020 however due to business priorities and on-going covid impacts this was not achieved and is scheduled to be delivered Q4 2021 <ul style="list-style-type: none"> Once deployed this will improve accuracy in this area <p>One read sent as actual</p> <ul style="list-style-type: none"> ICP: 0042251124PC489 team member intervention occurred outside of the Nova process. 		TODD Q4	Identified

[illegible]

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>From: 01-Feb-20 To:1521-Jan-21</p>	<p>TODD</p> <p>31 late RR files for switch moves.</p> <p>HNET</p> <p>RR for ICP 1001110357UNE5C was rejected and should have been accepted.</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 over the read renegotiation process are strong. COVID 19 delayed the gaining of reads during 2020.</p> <p>The audit risk rating is low. The late RR files are expected to improve data accuracy, and revised reconciliation data is washed up once the RR process is completed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>31 late RR files for switch moves.</p> <ul style="list-style-type: none"> The ability to gain timely actual reads has been hampered as previously noted Nova maintains following best practices and only sends files outside of timeframe when required to correct invoicing for customers. <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>RR for ICP 1001110357UNE5C was rejected and should have been accepted.</p> <ul style="list-style-type: none"> HNET rejected the RR for the ICP 1001110357UNE5C as didn't have a midnight actual read for the day from ELKI. ELKI did not provide us the midnight actual read We didn't have HHR internal data for the ICP and weren't able to verify their actual read 			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
TODD <ul style="list-style-type: none"> As above HNET <ul style="list-style-type: none"> HHR internal data for AMI meters received 	On-going	

Gaining trader informs registry of switch request - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.12 With: Clause 14 Schedule 11.3 From: 05-Feb-20 To: 12-Oct-20	TODD One HH switch requested more than 90 days from NT sent date. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong as processes in place are robust. The audit risk rating is low as only two ICPs were affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. One HH switch requested more than 90 days from NT sent date <ul style="list-style-type: none"> ICP: 0110008622EL0FB <ul style="list-style-type: none"> In alignment with the agreed contract start date the NT was backdated >90 days 		On-going	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Losing trader provision of information - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.13</p> <p>With: Clause 15 Schedule 11.3</p> <p>From: 01-Feb-20 To: 15-Jan-21</p>	<p>TODD</p> <p>30 ICPs had response code AD (advanced metering) invalidly applied. None of the ICPs had the AMI flag selected at the time of the switch.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 the AN response codes are automatically assigned by Orion and most HH ANs were issued with an incorrect response code.</p> <p>The impact on settlement and participants is minor, metering details can be confirmed from other information recorded on the registry.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>30 ICPs had response code AD (advanced metering) invalidly applied. None of the ICPs had the AMI flag selected at the time of the switch.</p> <ul style="list-style-type: none"> Documented change request was submitted late 2020 to support further enhancements to the process We considered this to be a full solution and failed to reconsider any interim solution. <p>This was an oversight on Nova's part and will be prioritized for delivery Q3</p>		Q3
Preventative actions taken to ensure no further issues will occur		Completion date
<ul style="list-style-type: none"> As above 		Q3
		Identified

Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: 17 and 18 Schedule 11.3</p> <p>From: 01-Feb-20 To: 15-Jan-21</p>	<p>TODD</p> <p>Two SR breaches where the NW arrival date was more than ten business days after the initial NW.</p> <p>51 NA breaches where the NW is sent more than two calendar months after the CS actual transfer date.</p> <p>One ICP incorrectly rejected.</p> <p>WISE</p> <p>1 late NW.</p> <p>HNET</p> <p>1 late NW.</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 over the withdrawal process are robust.</p> <p>The audit risk rating is assessed to be low as the impact to the market is minimal.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Item 1, 2 & 3.</p> <p>Two SR breaches, NA breaches, ICP rejected</p> <ul style="list-style-type: none"> Nova considers it is in the best interest of the customer to correct data to accurately invoice and that we comply with Clause 11.2 of part 11 "to provide complete and accurate information". We recognise this may cause some low impact non-compliances <p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>One late NW</p> <ul style="list-style-type: none"> process review to occur to strengthen in conjunction with staff refresher training 		On-going	Identified

<p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>One late NW</p> <ul style="list-style-type: none"> 1 late NWWP due to NTMI and the ICP 0000167722UNE60 customer got the incorrect ICP from building manager when joining. Flatting situation and ICP was moved to MERI which resulted in NW being processed late. 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> Refresher training completed April 2021 along with process review and updates <p>WISE</p> <ul style="list-style-type: none"> as above <p>HNET</p> <ul style="list-style-type: none"> HNET will continue to communicate closely with customers to verify ICP when joining 	<p>TODD April 2021</p> <p>WISE & HNET on-going</p>	

Metering information			
Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 11-Sep-20</p> <p>To: 12-Sep-20</p>	<p>TODD</p> <p>For one CS file the switch event reads did not reflect the actual reading or best estimate of an actual reading on the event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once 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 recorded as strong, this was due to a user error closing out the customer's account for the incorrect date.</p> <p>The impact on settlement and participants is minor; the kWh difference in readings was small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>For one CS file the switch event reads did not reflect the actual reading or best estimate of an actual reading on the event date.</p> <ul style="list-style-type: none"> ICP: 1001276348LCA17 issue due to human error with opening read post closure of vacant account incorrectly listed as an "actual" read System development with internal change team for implementation Q4 2021 <ul style="list-style-type: none"> Refer 4.10 & 6.7 		Q4	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Remedial training provided Development Q4 		Q4	

Switch saving protection			
Non-compliance	Description		
<p>Audit Ref: 4.17</p> <p>With: Clause 11.15AA to 11.15AC</p> <p>From: 05-Jun-20</p> <p>To: 31-Jul-20</p>	<p>WISE</p> <p>Customers contacted for non-administrative reasons, resulting in discussion of pricing and eventual switch withdrawal.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as strong at the time of the audit because the outbound calling practice has ceased.</p> <p>The impact on settlement and participants is moderate because some switching has not occurred as it was intended; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> Due To the nature of prepay customers when switching is performed without confirming with the customer, it is often necessary to proceed utilizing the switching NWWP or NWUA processes. Calls made at the time could be interpreted as not meeting the code requirements. 			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> As confirmed during audit, process has been retired 		July 2020	

Maintaining shared unmetered load			
Non-compliance	Description		
Audit Ref: 5.1 With: Clause 11.14 From: 01-Feb-20 To: 15-Jan-21	TODD The trader daily unmetered kWh was incorrect on the registry for two ICPs. 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	Controls are rated as strong. The reporting in place has been improved during the audit period. The non-compliance found was due to human error. The audit risk rating is low as the effect on submission is very minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. <ul style="list-style-type: none"> ICP 1000555666PC131 & 0000005765CP0E8 calculated incorrectly due to team members not following prescribed calculation process Calculations for both ICPs have been corrected 		April 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Billing team process updated, and team provided refresher training Refresher training completed April 2021 		April 2021	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 01-Feb-20</p> <p>To: 15-Jan-21</p>	<p>TODD</p> <p>While meters were bridged, energy was not metered and quantified according to the code for nine ICPs.</p> <p>WISE</p> <p>While meters were bridged, energy was not metered and quantified according to the code for five ICPs.</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>Controls are rated as strong for both the management of distributed generation and the management of bridged meters.</p> <p>The audit risk rating is low as the volumes for the sample of bridged meters were confirmed to be as accurate as possible.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted</p> <ul style="list-style-type: none"> The existence of bridged meters where energy was not metered or quantified during bridge period is acknowledged ICP 0000105283UNE27 <ul style="list-style-type: none"> Refer 2.11 <p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted</p> <ul style="list-style-type: none"> The existence of bridged meters where energy was not metered or quantified during bridge period is acknowledged 		On-going
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
TODD & WISE <ul style="list-style-type: none"> We continue to work with MEPs through service level agreements and on-going regular operational meetings to ensure bridging of meters continues to be an undesirable outcome 	On-going	

Responsibility for metering at GIP			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 5 of Schedule 15.2 From: 09-Jan-20 To: Mar-21	TODD (TGTL) The MEP and certification for JRD1101TGTLG were not updated until more than ten business days after metering certification. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak. A process is in place, but the required information was not updated. The audit risk rating is low because the metering was certified.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. <ul style="list-style-type: none"> Permission restrictions on the Reconciliation Manager's (RM) portal resulted in Accucal not being able to update the certification date for JRD1101. Nova updated the certification date for JRD1101 upon becoming aware of this breach. 		May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> The RM has granted Accucal permissions to make updates on behalf of the TGTL code 		May 2021	

Derivation of meter readings		
Non-compliance	Description	
<p>Audit Ref: 6.6</p> <p>With: Clause 5 of Schedule 15.2</p> <p>From: 01-Feb-20</p> <p>To:21-Jan-21</p>	<p>TODD</p> <p>Ten of the 16 examples with meter conditions reported were not actioned as expected.</p> <p>Customer and photo readings are not specifically validated against at least two readings not provided by the customer.</p> <p>Four examples checked found none were validated against a set of readings from another source.</p> <p>One customer reading was entered as an actual read for ICP 0008009802TU5F3.</p> <p>Potential impact: Medium</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>Controls are rated as moderate overall. The controls over most of the process are robust, but customer photo readings are consistently treated as validated readings where they have not been validated against at least two validated actual readings provided by a source other than the customer.</p> <p>The audit risk rating is low as the volume of customer reads is small.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Item 1.</p> <p>Ten of the 16 examples with meter conditions reported were not actioned as expected.</p> <ul style="list-style-type: none"> Meter conditions process will be implemented with priority Q3 <p>Item 2.</p> <p>Customer and photo readings are not specifically validated against at least two readings not provided by the customer.</p> <ul style="list-style-type: none"> The described solutions presented by Nova in the 2020 Audit were implemented. 		<p>Q3 & May 2021</p>
		Identified

<ul style="list-style-type: none"> The recommended additional validation against two readings not provided by the customer has been implemented in the historic estimate process. <p>Item 3.</p> <p>One customer reading was entered as an actual read</p> <ul style="list-style-type: none"> ICP: 0008009802TU5F3 <ul style="list-style-type: none"> a) Refer above and recommendation 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> As above 		

NHH meter reading application			
Non-compliance	Description		
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Feb-20</p> <p>To: 15-Jan-21</p>	<p>TODD</p> <p>An incorrect last actual read date and read were recorded for ICP 1001276348LCA17 (12/09/20) from the sample of five ICPs checked.</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 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
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> ICP: 1001276348LCA17 <ul style="list-style-type: none"> Refer 4.10 			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> As above 			

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-Feb-20</p> <p>To: 15-Jan-21</p>	<p>TODD</p> <p>Exceptional circumstances were not proven for the ten ICPs sampled that were not read during the period of supply.</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>Controls are rated as strong as the revised process for TODD has been implemented. The audit sample period doesn't reflect these results as yet, but internal reporting shows an improvement.</p> <p>The audit risk rating is low as the number of ICPs not read during the period of supply is low overall.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> Nova accept that exceptional circumstances were not proven however post the implementation of our phased improvements that will continue to be delivered, we anticipate on-going improved results 		Q4	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> As above 		Q4	

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: Sep-20 and Nov-20</p>	<p>TODD</p> <p>Two Meter Reading Frequency reports were submitted late.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as reminders are scheduled to prevent this happening in the future.</p> <p>The audit risk rating is low as both of the late meter reading frequency report submissions were made within one week of the due date, and reminders have been scheduled to prevent further late submissions.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> TODD submitted the files upon becoming aware of the late submission. Meter Reading Frequency reports for TODD are automatically generated each month for review and to forward to the Authority. One file was submitted late due to an oversight. The other file was submitted late due to the automated email being generated while staff were on leave over Christmas. 		January 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<ul style="list-style-type: none"> TODD have created calendar reminders to ensure that Meter Reading Frequency reports have been forwarded to the Authority 		February 2021
		Identified

NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Feb-20 To: 15-Jan-21	TODD Exceptional circumstances not proven for three ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as the revised process for TODD has been implemented. The audit risk rating is low as the number of ICPs affected is very small.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. <ul style="list-style-type: none"> Refer 6.8 			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> As above 			

Calculation of ICP days	
Non-compliance	Description
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: Apr-19 r14</p> <p>To: Feb-20 r7</p>	<p>TODD</p> <p>Zeroing does not occur for AV110 submissions. At least four ICP days differences between AV110 submissions and the registry were caused by backdated withdrawals or downgrades where data recorded against the old aggregation factor combination for the period was not zeroed.</p> <p>ICP 0000329419TPDOB incorrectly had ICP days reported against INV0331 instead of NMA0331 for May 2019 r14.</p> <p>An end of month read was added before the switch in date for ICP 0000031488WE974. Consumption and ICP days between the end of month read and the switch in date was reported in error.</p> <p>WISE</p> <p>Incorrect ICP days for five ICPs</p> <p>HNET</p> <p>ICP days one too few for two ICPs</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 rated as moderate overall.</p> <ul style="list-style-type: none"> The incorrect NSP and end of month reading outside the period of supply appear to be isolated errors, and preventative controls are in place to prevent recurrence of these issues. Zeroing processes are in place for volume information, but not ICP days. <p>The impact is assessed to be low based on the differences identified.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Zeroing does not occur for AV110</p> <ul style="list-style-type: none"> TODD will review its process around the washup of ICP Days. <p>ICP 0000329419TPD0B</p> <ul style="list-style-type: none"> User error led to steps being missed that would have aligned the NSP in TODD's system with the registry. A review of process has been undertaken and documented to reduce chances of this occurring in the future. <p>ICP 0000031488WE974.</p> <ul style="list-style-type: none"> Controls around the End Of Month read insert process have been strengthened to ensure that reads cannot be inserted prior to a starting read. 	TODD Q3	Identified
<p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>ICPs 0006570887RN083 and 0000801313TU3B2</p> <ul style="list-style-type: none"> Both had one ICP day too few due to incorrect start dates being entered for meter changes leading to a one-day gap in the month. <ul style="list-style-type: none"> This has been resolved for R7 	HNET January 2021	
<p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> Updated database to fix mismatched ICP's status on Registry 	WISE February 2021	

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> As above <p>HNET</p> <ul style="list-style-type: none"> HNET permanently fixed our logic to selects the correct actual read date when there were two events on the meter replacement date. There will be no more missing ICP days in any revision. <p>WISE</p> <ul style="list-style-type: none"> Automated update of Registry's status according to Reconnection/Disconnection to match the status of Registry and PEBS. 	<p>TODD Q3</p> <p>HNET January 2021</p> <p>WISE April 2021</p>	

Electricity supplied information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.3 With: Clause 15.7 From: 01-Apr-20 To: 30-Nov-20	HNET Electricity supplied file incorrect for the period April to November 2020. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, as they are sufficient to mitigate the risk of incorrect as billed data for most ICPs. The impact is rated as low because there is no impact on market submission, and only one ICP was affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
HNET Response: Non-Compliance accepted. <ul style="list-style-type: none"> HNET has applied the compensation factor to billed report for TOU ICPs. HNET will check the GR 130 files each month to compare billed and submission volumes. 		April 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> As above and recommendation 		On-going	

HHR aggregates information provision to the reconciliation manager			
Non-compliance		Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Mar-20 To: 11-Mar-21		TODD and HNET HHR aggregates file does not contain electricity supplied information. Potential impact: None Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		The issue relating to content of the aggregates file is an error in the code, submission data is provided as expected.	
Actions taken to resolve the issue		Completion date	Remedial action status
TODD – HNET Response: Non-Compliance accepted. <ul style="list-style-type: none">HHR aggregates file doesn’t contain electricity supplied informationNova will continue to prepare the HHR aggregates file at an ICP level based on submission information as required by the Reconciliation Manager.Nova supports a Code change to allow the aggregate files used in practice within the industry to remain unchanged.		On-going	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD - HNET <ul style="list-style-type: none">We continue to support a code change		On-going	

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: 31-Mar-21</p>	<p>TODD</p> <p>An unmetered load correction for ICP 0000026059WE8F3 was not processed accurately.</p> <p>Inaccurate submission for ARC Innovations HHR metering.</p> <p>Four customer readings and one photo reading which were not fully validated were recorded as customer or actual readings, and used in the historic estimate process.</p> <p>HNET</p> <p>Incorrect R14 submission for one ICP, which was 1,176.73 kWh too low.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls over accuracy of submission data are strong.</p> <p>The audit risk rating is low:</p> <ul style="list-style-type: none"> total submission for ICP 0000026059WE8F3 was correct, and revised data is expected to be washed up, and all HHR settled ICPs with Arc meters have a metering category of 1 and multiplier of 1 so the impact is expected to be minor. the incorrectly classified readings may result in consumption being apportioned to the incorrect period. Any under or over submission is expected to wash out once actual readings are received. <p>For HNET the controls over accuracy of submission data mostly strong, only one exception was identified.</p> <p>The audit risk rating is low based on the under submission of 1,176.73 kWh.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>An unmetered load correction for ICP 0000026059WE8F3 was not processed accurately.</p> <ul style="list-style-type: none"> ICP: 0000026059WE8F3 refer 2.1 <p>Inaccurate submission for ARC Innovations HHR metering.</p> <ul style="list-style-type: none"> Refer 2.1 – item 18 <p>Four customer readings and one photo reading which were not fully validated were recorded as customer or actual readings and used in the historic estimate process.</p> <ul style="list-style-type: none"> Refer 6.6 & recommendation <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Incorrect R14 submission for one ICP, which was 1,176.73 kWh too low.</p> <ul style="list-style-type: none"> HNET ran the July 2019 R14 report in Sep 20, this ICP was detected in some way in the validation process and HE volume was manually calculated with 2 actual reads. HNET used 2 actual reads but didn't pick up all the actual reads from July 2019(05 July 2019, 19 July 19, 24 July 19) it caused a revision variance for the month. Confirmed that there is no revision variance in Aug and Sep 2019 for the ICP. 	<p>TODD on-going</p> <p>HNET January 2021</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> • HNET no longer query and review ICP days in any revision as we have already fixed the ICP days error in Jan 2021. <ul style="list-style-type: none"> ○ As discussed during the audit we had ICP days error when there is a trader event on the date the meter was changed, it was fixed. • HNET will continue to eliminate human involved validation process. 	January 2021 & on-going	

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: June, July and August 2020 r3 and January, February and March 2020 r7</p>	<p>TODD</p> <p>Historic estimate thresholds were not met for R7 for a small number of months and revisions.</p> <p>HNET</p> <p>Historic estimate thresholds were not met for R3 and R7 for a small number of months and revisions.</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>Controls are rated as strong, as they are sufficient to mitigate the risk of not meeting the threshold most of the time. The NSPs where the target wasn't met have a low total number of ICPs.</p> <p>The audit risk rating is low because the overall percentage of HE is high.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> As noted by the auditor the NSPs identified that did not meet HE thresholds all contained less than 5 ICPs. NSPs with a small number of ICPs are susceptible to HE thresholds if one ICP can't be read i.e., due to access issues. 100% HE has been achieved for R14 Any Forward Estimates at R14 will continue to be checked. 'Permanent estimate' read types will continue to be applied. <p>HNET</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> The threshold was not met for some NSPs for revisions 3 and 7 because small number of ICPs are connected at the NSPs. We have been actively working on gaining an actual read at the earliest timeframe as possible. 	On-going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD & HNET</p> <ul style="list-style-type: none"> Continue focusing on optimising its standard by identifying and monitoring its performance and opportunities for improvement 	On-going	