

Compliance plan for emhTrade Reconciliation Participant Plan – 2020

Relevant information			
Non-compliance		Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 17-Nov-18 To: 8-Jan-20		Six ICPs recorded with the incorrect NSP. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as moderate, as the controls did not effectively capture NSP changes. The audit risk rating is low, as this affected only a small number of ICPs, and these will be corrected in the next revision.	
Actions taken to resolve the issue		Completion date	Remedial action status
As per comments noted in section 11.2.		see 11.2	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per comments noted in section 11.2.		see 11.2	

Audit trails			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 21 Schedule 15.2 From: 01-Nov-18 To: 8-Jan-20	Audit trails do not record the operator identifier for the person who completed the activity; only the emhTrade system user ID writes to the database. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as the number of people accessing the database is very small and that whilst the person who processed the change is not identifiable, it is easy to determine who has made the changes due to the functions each person undertakes. The audit risk rating is assessed to be low as it was simple to determine which person was responsible for processing the change from supporting information in the sample of audit trails reviewed.		
Actions taken to resolve the issue		Completion date	Remedial action status
emhTrade was able to demonstrate user Audit trails and does not foresee an immediate risk for auditing. There will only be one primary user going forward.		NA	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
emhTrade will only have one primary user and will meet the requirements.		NA	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 05-Aug-18 To: 23-May-19</p>	<p>Two late status updates to ready for decommissioning.</p> <p>Two late trader updates.</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 emhTrade update the registry at the earliest opportunity.</p> <p>The risk is low as the late updates had no impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
emhTrade had corrected all the exceptions noted		March 2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
emhTrade continue to monitor daily and are able to update as soon as practical with all necessary requirements.		March 2020	

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 18-Oct-19</p> <p>To: 30-Oct-19</p>	<p>The registry was not updated within five business days of commencement of trading for six 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>Controls are rated as moderate, because they are sufficient to ensure that the registry is updated on time most of the time.</p> <p>The risk rating is low, as the ICPs updated later were only late by 1-2 days.</p>	
Actions taken to resolve the issue		Completion date
emhTrade were able to identify and resolve as soon as practical which meant it was late by 1-2 days.		NA
Preventative actions taken to ensure no further issues will occur		Completion date
emhTrade believes controls are in place and monitored daily.		NA
		Identified

Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 of Schedule 11.3</p> <p>From: 17-Nov-18</p> <p>To: 8-Jan-20</p>	<p>One late CS file.</p> <p>The estimated daily kWh values were not consistent with the average consumption for the last read to read period in transfer CS files.</p> <p>Last read date incorrectly recorded for at least one 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>Controls are rated as moderate as the process to complete CS files is robust, but the non-compliance was caused by a misunderstanding of two aspects of the CS file content.</p> <p>The audit risk rating is low, as the current calculation of the average daily consumption will provide the gaining trader a more accurate average daily consumption than the average of the last read to read period which will effectively be a snapshot of one day's supply.</p>	
Actions taken to resolve the issue		Completion date
emhTrade believes our calculations are validated given we are an HHR participant. Further enquiries are being determined and we seek further guidance from the Authority.		April 2020
Preventative actions taken to ensure no further issues will occur		Completion date
emhTrade will be requesting further guidance from the Authority.		April 2020
		Disputed

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 of Schedule 11.3</p> <p>From: 17-Nov-18</p> <p>To: 8-Jan-20</p>	<p>Five late CS files.</p> <p>The estimated daily kWh values were not consistent with the average consumption for the last read to read period in transfer CS files.</p> <p>Last read date incorrectly recorded for at least one 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>Controls are rated as moderate as the process to complete CS files is robust, but the non-compliance was caused by a misunderstanding of two aspects of the CS file content.</p> <p>The audit risk rating is low, as the current calculation of the average daily consumption will provide the gaining trader a more accurate average daily consumption than the average of the last read to read period which will effectively be a snapshot of one day's supply.</p>	
Actions taken to resolve the issue		Completion date
As per comments noted on Audit Ref: 4.3.		See 4.3
Preventative actions taken to ensure no further issues will occur		Completion date
As per comments noted on Audit Ref: 4.3.		See 4.3
		Remedial action status
		Disputed

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clause 17 of Schedule 11.3 From: 5-Jan-18 To: 25-Feb-19	Three late switch withdrawals. 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 processes to manage this are robust and all were processed as soon as possible. The audit risk rating is low, as this affected only two ICPs.	
Actions taken to resolve the issue		Completion date
emhTrade believes no issue has occurred as there were agreed exceptions with the customer and correction of dates due to new year eg; 2019 instead of 2018.		NA
Preventative actions taken to ensure no further issues will occur		Completion date
No further comments as emhTrade have strong controls in this area.		NA
		Identified

Electricity conveyed & notification by embedded generator			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 19-Dec-18</p> <p>To: 13-Mar-19</p>	<p>A meter was bridged, energy was not metered and quantified according to the code for ICP 0492008787LCD8F.</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 rated as strong as emhTrade will only bridge a meter as a last resort and they have good visibility of their customer base, so this is managed closely.</p> <p>The audit risk rating is low as only one ICP was affected during the audit period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Resolved after faulty meter replaced once repairs of Asbestos completed.		Closed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
emhTrade believes we acted on the safety and well being of the customer, having identified asbestos on site we engaged with all parties to resolve as soon as practical.		Closed	

Buying and selling notifications			
Non-compliance	Description		
Audit Ref: 11.1 With: Clause 15.3 From: 04-Feb-19 To: 18-Mar-19	No trading notification was provided for HEM profile for CBG011. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	There is no impact and the this is not expected to be needed in the future as all ICPs are HHR profiled. The reconciliation manager's system recorded the profile correctly, and the notification process does not allow the trader to enter the profile.		
Actions taken to resolve the issue		Completion date	Remedial action status
emhTrade believes the profile is recorded correctly on the RM system. No further action is required.		NA	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action to be taken as we are no longer using the HEM trade profile.		NA	

Calculation of ICP days			
Non-compliance	Description		
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Sept-18</p> <p>To: 08-Jan-20</p>	<p>Inaccurate ICP days were reported for a small number of ICPs. Corrected data will be washed up in the next available revision, and processes have been corrected.</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>Controls are currently rated as moderate but will be strengthened to strong with the adoption of checking the ICPs missing (GR090) report.</p> <p>The impact is assessed to be low, as updated data will be provided through the revision process prior by revision 14 in all instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Discrepancies were reviewed and corrected during internal reconciliation for the ICPs affected and new revisions of the report contains accurate information		June 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
emhTrade included the GR-090 in their controls to avoid incorrect reporting		March 2020	

Electricity supplied information provision to the reconciliation manage			
Non-compliance	Description		
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7</p> <p>From: 17-Nov-18</p> <p>To: 8-Jan-20</p>	<p>Incorrect billed volumes reported in the AV130.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak as the billed vs submitted volumes have been incorrect for some time, but this has not been identified via the existing controls in place.</p> <p>The audit risk rating is low, as the actual billed vs submitted figures for the NSPs checked indicate that billed vs submitted is likely to be within +/- 0.5% threshold.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
emhTrade is investigating our system to verify what caused the low volume reporting of AV120. The outcome of this will determine the resolution.		March 2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
emhTrade will include a validity check prior to submitting the AV120 to the Reconciliation Manager.		March 2020	

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: entire audit period</p>	<p>Alleged breach 1811EMHL1 was recorded for late provision of February 2019 initial submission information.</p> <p>HHR aggregates file does not contain electricity supplied information.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three</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 controls in place are robust to prevent any further late submissions.</p> <p>The issue relating to content of the aggregates file is an error in the code, emhTrade is providing submission information as expected.</p> <p>The audit risk rating is low as this is unlikely to occur in the future.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Data was submitted late following a notification by the RM of which our breach was resolved early.		February 2019	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
emhTrade was aware of this and had already put remedies in place since our completion date.		February 2019	

Creation of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 01-Feb-19 To: 28-Feb-19</p>	<p>No volume was submitted in the Ri revision for one ICP for February 2019.</p> <p>Alleged breach 1811EMHL1 was recorded for late provision of February 2019 initial submission information.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, because submissions are now submitted at the end of day 3 to prevent any further reoccurrences and NHH meters are not accepted any longer.</p> <p>The audit risk rating is low there have been no late submissions since, and ICPs with NHH meters are no longer accepted.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As per comments noted on Audit Ref: 11.4 With: Clause 15.8.		See 11.4	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per comments noted on Audit Ref: 11.4 With: Clause 15.8.		See 11.4	

Allocation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.3</p> <p>With: Clause 15.5</p> <p>From: 17-Nov-18</p> <p>To: 8-Jan-20</p>	<p>Six ICPs recorded with the incorrect NSP.</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>Controls are rated as moderate, as the controls did not effectively capture NSP changes. This is expected to be strengthened to strong with the use of the ICP missing report.</p> <p>The audit risk rating is low, as this affected only a small number of ICPs, and this will be corrected in the next revision.</p>	
Actions taken to resolve the issue		Completion date
emhTrade had already identified the NSP changes during internal reconciliation however later than the first revisions being submitted. All NSPs identified during the audit were submitted correctly in later revisions.		June 2019
Preventative actions taken to ensure no further issues will occur		Completion date
emhTrade included the GR-090 in their controls to avoid incorrect reporting		March 2020
		Identified

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 17-Nov-18 To: 8-Jan-20	Six ICPs recorded with the incorrect NSP. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as the controls did not effectively capture NSP changes. This is expected to be strengthened to strong with the use of the ICP missing report. The audit risk rating is low, as this affected only a small number of ICPs, and this will be corrected in the next revision.	
Actions taken to resolve the issue		Completion date
As per comments noted in section 12.3 of this Audit report with clause 15.5 of the Code		See 12.3
Preventative actions taken to ensure no further issues will occur		Completion date
As per comments noted in section 12.3 of this Audit report with clause 15.5 of the Code		See 12.3
		Remedial action status
		Identified

Reconciliation participants to prepare information		
Non-compliance	Description	
Audit Ref: 12.9 With: Clause 2 of schedule 15.3 From: 01-Feb-19 To: 28-Feb-19	No volume was submitted in the Ri revision for one ICP for February 2019. 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 and the risk as low, because ICPs with NHH meters are no longer accepted.	
Actions taken to resolve the issue		Completion date
emhTrade believes that volumes were submitted in initial revision as estimates		February 2019
Preventative actions taken to ensure no further issues will occur		Completion date
emhTrade no longer use HEM profile and no longer trade NHH metering.		February 2019
		Disputed

Provision of submission information to the RM		
Non-compliance	Description	
Audit Ref: 13.1 With: Clause 8 of schedule 15.3 From: 01-Feb-19 To: 28-Feb-19	No volume was submitted in the Ri revision for one ICP for February 2019. 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 and the risk as low, because ICPs with NHH meters are no longer accepted.	
Actions taken to resolve the issue		Completion date
As per comments noted in section 12.9.		February 2019
Preventative actions taken to ensure no further issues will occur		Completion date
As per comments noted in section 12.9.		February 2019
		Disputed