

Compliance plan for Pioneer Energy (Nov 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-Jan-20</p> <p>To: 28-Oct-20</p>	<p>The registry validation is not sufficient to identify all discrepancies between Orion and the registry, including discrepancies which could impact the accuracy of reconciliation submissions.</p> <p>Four ICPs had incorrect status event dates recorded on the registry. One was corrected during the audit.</p> <p>Four ICPs had incorrect profiles recorded on the registry, but correct profiles were applied for submission.</p> <p>One trader update had an incorrect event date applied and was corrected during the audit.</p> <p>Six ICPs have some incorrect reading information, which Pioneer intends to update prior to r14.</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>Controls are rated as moderate as they are sufficient to ensure that data is recorded correctly most of the time. The current validation processes are focussed on data which had changed.</p> <p>The impact on submission is minimal and will wash out when the records are corrected.</p> <ul style="list-style-type: none"> For the event date discrepancies, a small number of exceptions were identified and the difference between the applied dates and correct dates was small. The impact of the trader event date update is low. Corrected submission information will be provided through the revision process. 	
Actions taken to resolve the issue		Completion date
Corrected submission information will be checked and updated through the revision process		01.11.2020
Preventative actions taken to ensure no further issues will occur		Completion date

New report is getting developed by our IT Orion provider Agility (#PGL-984). This will give us the ability to complete a reconciliation between Orion and the Registry on a monthly basis.	01.03.2021	
Until this report is in place we will complete checks using the LIS file on a monthly basis to ensure we are reconciled between Orion and the Registry for fields that are mentioned in Section 2.1.	01.11.2020	

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 21-Oct-19</p> <p>To: 01-Jul-20</p>	<p>17 metered ICPs did not have meter certification provided within five business days of the change to active status.</p> <p>Potential impact: Medium</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, because meter certification is an MEP responsibility and Pioneer sometimes cannot achieve compliance.</p> <p>The impact is assessed to be low because a small number and proportion of meters were not certified within the timeframes. Uncertified metering installations are likely to be less accurate than certified metering installations, so there could be a minor impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
PION sending service requests to the MEP's for recertification of the meters		01.03.2021 for all MEP's to complete work	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>At the switching in process we will complete a check on the ICP to make sure the meter has a current certificate</p> <p>Also PION will complete a second check on a monthly basis which will be from our LIS file for any new switched in ICP's to check on the certification date of the meter/s to make sure this is valid.</p>		01.11.2020	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 15-Jan-20</p> <p>To: 23-Jul-20</p>	<p>49 late status updates to active.</p> <p>Four late status updates to inactive.</p> <p>15 late trader updates.</p> <p>Two late ANZSIC code updates.</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 rated as moderate. I found late updates often related to data corrections, which improved overall data accuracy, with a smaller proportion caused by delays in receiving information to confirm the update attributes or delays in processing the updates. Processing delays were mainly isolated to holiday periods and COVID.</p> <p>The risk is low as most updates were completed on time or soon after they were due or related to corrections.</p>	
Actions taken to resolve the issue		Completion date
Continue to correct any inaccuracies to make sure data in the registry to correct		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Two staff now checking and backing up data and processes		01.11.2020

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: 17-Feb-20</p> <p>To: 28-Oct-20</p>	<p>15 late status updates to active for new connections.</p> <p>ICP 0000814358WP62F had an incorrect active status date; and was corrected during the audit.</p> <p>ICP 1002080190LCC09 has active status recorded from 09/06/20 but was not active until 25/06/20.</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, because they are sufficient to ensure that the registry is updated on time, and that active dates are accurately recorded most of the time.</p> <p>The risk rating is low. The date discrepancies were small. Excluding the corrections following the previous audit the updates were made within 35 business days of the event date. The impact on submission is minimal and will wash out when the records are corrected.</p>	
Actions taken to resolve the issue		Completion date
Continue to correct any inaccuracies to make sure data in the registry to correct		In Place already
		So completed
Preventative actions taken to ensure no further issues will occur		Completion date
New report is getting developed by our IT Orion provider Agility (#PGL-984). This will give us the ability to complete a reconciliation between Orion and the Registry on a monthly basis.		01.03.2020
Until this report is in place we will complete checks using the LIS file on a monthly basis to ensure we are reconciled between Orion and the Registry for fields that are mentioned in Section 2.1.		01.11.2020

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k)) of Schedule 11.1</p> <p>From: 20-Aug-20</p> <p>To: 16-Oct-20</p>	<p>Incorrect ANZSIC codes were applied for four ICPs; and were corrected during the audit.</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>There are preventative controls are in place to ensure that ANZSIC codes are initially recorded accurately, and monitoring controls are periodically used to check and correct ANZSIC codes. Because four (9.8%) of the sample of 41 ICPs individually checked were found to be incorrect, I have rated the controls as moderate.</p> <p>The audit risk rating is low, because this has no direct impact on submission accuracy and the incorrect codes have been corrected.</p>	
Actions taken to resolve the issue		Completion date
<p>Continue to correct any inaccuracies to make sure data in the registry to correct</p> <p>ANZSIC codes updated during audit</p>		<p>In Place already</p> <p>So completed</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>New report is getting developed by our IT Orion provider Agility (#PGL-984). This will give us the ability to complete a reconciliation between Orion and the Registry on a monthly basis.</p> <p>Until this report is in place we will complete checks using the LIS file on a monthly basis to ensure we are reconciled between Orion and the Registry for fields that are mentioned in Section 2.1</p>		<p>01.03.2020</p> <p>01.11.2020</p>
		Cleared

Management of "active" status			
Non-compliance		Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17</p> <p>Schedule 11.1</p> <p>From: 17-Feb-20</p> <p>To: 28-Oct-20</p>		<p>ICP 0000814358WP62F had an incorrect active status date; and was corrected during the audit.</p> <p>ICP 1002080190LCC09 has active status recorded from 09/06/20 but was not active until 25/06/20.</p> <p>ICP 0000007765TED75 has active status recorded from 06/09/19 but was active from 05/09/19.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating		Rationale for audit risk rating	
Low		<p>Controls are rated as moderate, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed.</p> <p>The impact is low, because a small number of exceptions were identified and the difference between the applied dates and correct dates was small. The impact on submission is minimal and will wash out when the records are corrected.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
Continue to correct any inaccuracies to make sure data in the registry to correct		In Place already So completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>New report is getting developed by our IT Orion provider Agility (#PGL-984). This will give us the ability to complete a reconciliation between Orion and the Registry on a monthly basis.</p> <p>Until this report is in place we will complete checks using the LIS file on a monthly basis to ensure we are reconciled between Orion and the Registry for fields that are mentioned in Section 2.1</p>		01.03.2020 01.11.2020	

Management of “inactive” status			
Non-compliance	Description		
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 25-Jun-20 To: 29-Jun-20	ICP 0000033661DEA96 has an incorrect disconnection date applied but cannot be easily corrected because the ICP is now decommissioned. 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, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed. The impact is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continue to correct any inaccuracies to make sure data in the registry to correct		In Place already So completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New report is getting developed by our IT Orion provider Agility (#PGL-984). This will give us the ability to complete a reconciliation between Orion and the Registry on a monthly basis. Until this report is in place we will complete checks using the LIS file on a monthly basis to ensure we are reconciled between Orion and the Registry for fields that become inactive		01.03.2020 01.11.2020	

Inform registry of switch request for ICPs - standard switch	
Non-compliance	Description
Audit Ref: 4.1 With: Clause 2 Schedule 11.3 From: 4-Feb-20 To: 20-May-20	Transfer switches were requested for ICPs 0000033072CPC61 (20/05/20), 0000489550CE5C5 (30/04/20), and 0000567442TP9E5 (04/02/20) when the customer had confirmed that they were moving into the address. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong because information is obtained to support the switch type selected. The incorrect switch types were applied because of confusion regarding whether the customer was moving in or transferring, and other team members temporarily assisting with the process during COVID-19 lockdown.</p> <p>The impact is assessed to be low, because there was a minimal impact for the customer, other trader and the Authority who use the switch type in their statistics.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Promapp (process) updated		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff trained		01.11.2020	

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</p> <p>Schedule 11.3</p> <p>From: 01-Apr-20</p> <p>To: 20-Jul-20</p>	<p>The "CO" AN response code was incorrectly applied for ICPs 0000510111CE82C (01/04/20) and 0008448484NVAC2 (20/07/20).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate. Both preventative and detective controls are in place for AN codes but did not operate as intended because 1) Orion applied an incorrect code and 2) the incorrect code was not detected through the manual review.</p> <p>The impact is assessed to be low because the switches were completed as expected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff aware of issue and manually checking AN files before they are transferred to the Registry.		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training and Promapp (Processes) will be updated		01.12.2020	

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: 23-Jan-20</p> <p>To: 07-Jul-20</p>	<p>Two late TR CS files.</p> <p>At least eight CS average daily consumption values were not consistent with the average consumption for the last read to read period in transfer CS files, because the Orion EDC is applied instead of consumption for the last read to read period.</p> <p>At least three transfer CS files contained incorrect last actual read dates.</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 over CS files have improved since the previous audit, and I saw evidence that the training issues which previously caused incorrect CS content have been resolved. The issues were isolated to the estimated daily consumption and last actual read date fields.</p> <p>The audit risk rating is low because the average daily kWh information provided reflects the EDC on the meters tab at the time the switch was completed and is a reasonable estimate of the ICP's consumption. The last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff aware		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Check at time of sending CS files		Ongoing	

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: 4-Feb-20</p> <p>To: 06-Feb-20</p>	<p>The switch move NTs for 0000501294CEA6B (04/02/20) and 0006632640ALE93 (06/02/20) were raised more than two business days after pre-conditions were cleared.</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	The controls are rated as strong because processes have improved during the audit period. NTs are not expected to be delayed by system issues, because manual files will be issued where necessary. The impact is assessed to be low.		
Actions taken to resolve the issue		Completion date	Remedial action status
PION switching team will manually process the switch on the Registry in future rather than waiting for IT Support		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching team aware and trained		01.11.2020	

Losing trader provides information - switch move			
Non-compliance	Description		
Audit Ref: 4.8 With: Clauses 10(1) Schedule 11.3 From: 27-Mar-20 To: 08-Jun-20	Three late MI CS files. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. CS files are normally accepted by the registry, and failed files are normally promptly identified through monitoring of the switch breach report. The impact is assessed to be low because the files were sent within two business days of the due date.		
Actions taken to resolve the issue		Completion date	Remedial action status
Issue resolved and CS files eventually uploaded correctly		As above, already resolved	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching staff aware of rejecting by Registry of CS file and will continue to monitor before deadlines going forward		Ongoing	

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: 15-Jan-20</p> <p>To: 14-Aug-20</p>	<p>At least 13 CS average daily consumption values were not consistent with the average consumption for the last read to read period in transfer CS files, because the Orion EDC is applied instead of consumption for the last read to read period.</p> <p>At least three switch move CS files contained incorrect last actual read dates.</p> <p>The CS file 0000507601DEF19 (14/02/20) did contained readings which did not match the AMI data, or readings recorded in Orion.</p> <p>Eight switch move CS files did not have CSMETERCHANNEL, CSMETERCOMP and CSMETERINSTALL lines supplied.</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>Controls over CS files have improved since the previous audit, and I saw evidence that the training issues which previously caused incorrect CS content have been resolved. The issues were isolated to the estimated daily consumption and last actual read date fields, apart from one ICP affected by a post switch billing correction.</p> <p>The audit risk rating is low because the average daily kWh information provided reflects the EDC on the meters tab at the time the switch was completed and is a reasonable estimate of the ICP's consumption. The last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on submission.</p>	
Actions taken to resolve the issue		Completion date
Switching team aware and Promapp (process) updated		01.12.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Switching staff trained		01.12.2020
		Identified

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 14-Feb-20 To: 01-Jun-20	The agreed switch reading was not applied in Orion for 0001425261UN6BF (01/06/20) resulting in forward estimate being created instead of historic estimate. The agreed switch reading was not applied in Orion for ICP 0000507601DEF19 (14/02/20) resulting in 71 kWh of under submission. 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, I found that the agreed switch reading was applied except where they had been adjusted post switch due to a billing correction. The audit risk rating is low based on the kWh differences identified.	
Actions taken to resolve the issue		Completion date
Switching and Billing team aware of issue. 0000507601DEF19 is corrected		01.11.2020 12.11.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Switching and Billing team notified of issue and trained going forward		01.11.2020

Gaining trader to advise the registry manager - gaining trader switch	
Non-compliance	Description
Audit Ref: 4.14 With: Clause 16 Schedule 11.3 From: 23-Dec-19 To: 19-Feb-20	One late HH CS 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	<p>The controls are rated as strong because both preventative and detective controls are in place for AN codes. The late file occurred because the switch was not identified on the switch breach report.</p> <p>The impact is assessed to be low; the switch was completed within 36 business days. Submission information was corrected through the revision process once the switch was complete.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Processed and corrected as soon as it was identified		Submission information corrected as per above	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching team to continue to monitor the Registry's switch breach report		Ongoing	

Metering information			
Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 21</p> <p>Schedule 11.3</p> <p>From: 14-Feb-20</p> <p>To: 14-Feb-20</p>	<p>For one switch move CS file issued by Pioneer, the switch event readings did not reflect the actual reading or estimated reading on the 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		
Low	Controls are rated as moderate, because I was unable to confirm the source of the original read in the CS file. The audit risk rating is low, based on the kWh difference.		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff trained		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching and Billing team aware of this incident and trained		01.11.2020	

Distributed unmetered load			
Non-compliance	Description		
<p>Audit Ref: 5.4</p> <p>With: Clause 11 Schedule 15.3, Clause 15.37B & 16A.26</p> <p>From: 01-Mar-20</p> <p>To: 28-Oct-20</p>	<p>The Grey and Gore DC DUMML databases are not accurate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The effectiveness of the controls is recorded as moderate as Pioneer are working to resolve the issues found.</p> <p>The impact on settlement is medium because submission information is based on databases which contain some inaccurate information.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Grey DC – Audit completed 27.05.2020, Next audit 01.12.2021. At the time of the last audit the LED rollout was reported as being 85% complete. The remainder of the rollout has been completed during the audit period. The completion of the rollout has seen the correction of the discrepancies identified in the 2019 field audit. The only inaccuracy identified in this audit was one item of load with no wattage recorded.</p>		27.05.2020	Identified
<p>Gore DC – Next audit due 08.12.2020 - Working closely with Peter Standing at Gore DC they have carried out a complete review of the under canopy and Parks lighting, positioning of the full stock identifying the type and number and how they are presently powered. This is being loaded into the SLIMs database and have reviewed the other anomalies pointed out in the last audit.</p>		08.12.2020	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Grey DC - Working closely with ElectroNet to ensure an ongoing accurate database is maintained. From the last audit 27.05.2020 the database is pretty accurate now.</p>		27.05.2020	
<p>Gore DC – Working closely with Gore DC to ensure an ongoing accurate database is maintained. The results of the audit due on 08.12.2020 should show this.</p>		08.12.2020	

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13 and Clause 15.13</p> <p>From: 01-Jan-20</p> <p>To: 28-Oct-20</p>	<p>ICPs 0000033279CE035, 0000101696DE14B, 0000500005CE26E and 0000204054DEBB3 have submission against the RPS and PV1 profiles, but only RPS profile is recorded on the registry.</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 are rated as strong. Generation consumption is captured and reported where generation is present, and the non-compliance relates only to the accuracy of registry metering information.</p> <p>The incorrect profiles on the registry have no impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Registry updated		01.11.2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>New report is getting developed by our IT Orion provider Agility (#PGL-984). This will give us the ability to complete a reconciliation between Orion and the Registry on a monthly basis.</p> <p>Until this report is in place we will complete checks using the LIS file on a monthly basis to ensure we are reconciled between Orion and the Registry for fields RPS and PV1 profiles</p>		<p>01.03.2020</p> <p>01.11.2020</p>	

NHH meter reading application	
Non-compliance	Description
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 14-Feb-20</p> <p>To: 14-Feb-20</p>	<p>The agreed switch reading was not applied in Orion for ICP 0000507601DEF19 (14/02/20) resulting in 71 kWh of under submission.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, I found that the correct switch event reading was applied for all other examples checked. The audit risk rating is low based on the kWh difference.		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching team aware		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All staff members are aware of this incident and will monitor and check going forward		Ongoing	

NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) of Schedule 15.2 From: 01-Apr-20 To: 30-Apr-20	An inaccurate four month read ICP total was provided in the April 2020 meter read attainment report for CYD0331-DUNE. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong. The reports are generated by Orion, and manually validated and corrected where actual readings have been received after the report was run. The error was isolated and caused by a typing error. There is no impact on submission, and a minor impact on the Authority, who use this report to monitor read attainment.		
Actions taken to resolve the issue		Completion date	Remedial action status
Check put in place to make sure no further typing error		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Control in place		01.11.2020	

Meter data used to derive volume information		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Jan-20 To: 28-Oct-20	AMI meter reading data is rounded on import into the Orion. 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. Only AMI meters which are settled as NHH are affected. The impact is assessed to be low. Only NHH settled AMI readings provided with decimal places are affected, and the overall kWh difference is expected to be small.	
Actions taken to resolve the issue		Completion date
Noted		01.11.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Team will investigate decimal places on AMI meters. Orion issue which we will need to get our IT provider to investigate and fix.		31.05.2021

Calculation of ICP days	
Non-compliance	Description
Audit Ref: 11.2 With: Clause 15.6 From: 01-Jan-20 To: 28-Oct -20	The AV110 report excludes ICPs from revision submissions for periods where they were active if the ICP's current status is decommissioned and includes inactive ICP days where an ICP has switched in with inactive status. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate, because Orion does not calculate the correct number of ICP days where an ICP is decommissioned or switched in with inactive status. Monitoring controls are in place to identify ICPs with incorrect ICP days reported and adjust the submission information.</p> <p>The impact is assessed to be low, because a system change to resolve the issue is currently being tested, and revised submission data will be washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Manual controls are in place and further check's against ICPCOMP report before submitting. R14 is double checked, manually updated if required before submitting		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New control in place to check AV110 against ICPCOMP before sending. Agility have a fix in place which will be rolled out soon, so at the moment it is a manual process. All washups are double checked before submitting		Ongoing	

Electricity supplied information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7</p> <p>From: Aug-19</p>	<p>The AV120 report included information on ICPs which were billed by Pioneer but reconciled by another trader. They should have been excluded from Pioneer's billed submission.</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	Controls are rated as strong because the issue was isolated. Pioneer had invoiced the customer for the usage but was not responsible for settlement for the ICP. The impact is assessed to be low because there is no impact on settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected at R14 for Aug19		19.10.2020	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Control in place with a new s/sheet to monitor large differences and investigate and manually fix before report is submitted	Ongoing	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Jan-20 To: 28-Oct-20	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	The issue relating to content of the aggregates file is an error in the code, Pioneer is providing submission information as expected.	
Actions taken to resolve the issue		Completion date
Noted		01.11.2020
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to check and confirm EMS files before they submit on our behalf		Ongoing

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Jan-20</p> <p>To: 28-Oct-20</p>	<p>The agreed switch reading was not applied in Orion for ICP 0000507601DEF19 (14/02/20) resulting in 71 kWh of under submission.</p> <p>The agreed switch reading was not applied in Orion for 0001425261UN6BF (01/06/20) resulting in forward estimate being created instead of historic estimate.</p> <p>Six ICPs have some incorrect reading information, which Pioneer intends to update prior to r14.</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	
Low	<p>The controls are rated as moderate, because the submission process itself is operating as intended, the incorrect submissions were caused by inputs manually entered into those processes.</p> <p>The impact is assessed to be low, based on the kWh differences identified.</p> <p>Corrected submission information will be provided through the revision process.</p>	
Actions taken to resolve the issue		Completion date
Will be corrected at R14.		01.11.2020
Preventative actions taken to ensure no further issues will occur		Completion date
All staff aware		01.12.2020

Permanence of meter readings for reconciliation	
Non-compliance	Description
<p>Audit Ref: 12.8</p> <p>With: Clause 4 of Schedule 15.2</p> <p>From: Jul-18, Aug-18, and Sep-18 r14</p>	<p>Some estimates were not replaced by revision 14.</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	Controls are rated as moderate as they were sufficient to ensure that most NSPs had 100% historic estimate by revision 14, but there was room for improvement. The impact is low. Total forward estimate for the three months reviewed was 20,660.39 kWh. Some of this relates to unmetered load which is true historic estimate, but is incorrectly classified, and some relates to invalid forward estimate.		
Actions taken to resolve the issue		Completion date	Remedial action status
New process in place especially at R14 to check the historic estimates and amend if necessary before submitting		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Manual process in place until Agility fix in place		31.01.2021	

Historical estimates and forward estimates			
Non-compliance	Description		
Audit Ref: 12.11 With: Clause 4 and 5 Schedule 15.3 From: tests a and d	Historic estimate is not calculated as expected for some tests which used opening and/or closing reads to calculate historic estimate. Potential impact: None Actual impact: None Audit history: Twice Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak, because the calculation is not operating as expected for some ICPs with opening and closing readings. The impact is assessed to be low because a system change to resolve the issue is currently being tested, and revised submission data will be washed up. Small numbers of ICPs have switched in and out during the audit period.		
Actions taken to resolve the issue		Completion date	Remedial action status
Aware of issue and checking manually and correcting if required		01.12.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Controls in place and the fix from Agility will help resolve this issue		01.02.2021	

Forward estimate process			
Non-compliance	Description		
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: Apr-19, Aug-19, Nov-19, Dec-19, and Jan-20</p>	<p>Some balancing area differences between revisions were over the threshold because of inaccurate forward estimates.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate. Pioneer now have processes in place to identify invalid zero forward estimate and update it prior to submission.</p> <p>The audit risk rating is low because revised submission data will be washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Aware of issue and control/check in place		01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes in place to identify invalid zero forward estimate and update prior to submission if required		Ongoing	

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: Jan-Mar 19 (r14), Sep-Nov 19 (r7), Jan 20 (r3) and Mar 20 (r3)</p>	<p>Historic estimate thresholds were not met for some revisions.</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 were sufficient to ensure that most NSPs are close to the target values, but there was room for improvement.</p> <p>The impact is assessed to be low. Some of the forward estimate relates to unmetered load which is true historic estimate, but is incorrectly classified, and some relates to invalid forward estimate.</p>		

Actions taken to resolve the issue	Completion date	Remedial action status
Aware of issue. Control/check in place for UML.	01.11.2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Aware of issue and manually updated if required	Ongoing	