

Compliance plan for Switch Utilities (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: 22-Jan-19</p> <p>To: 27-Oct-20</p>	<p>Notification files have not been reviewed or actioned since April 2020.</p> <p>Some inaccurate information is recorded on the registry and/or in the Energy Database.</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: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement particularly for corrections.</p> <p>The impact is assessed as medium overall:</p> <ul style="list-style-type: none"> DART and DRS/MDMS retrieve ICP attribute information directly from the registry, including data used to determine the aggregation factors. The failure to import and review notification files in the Energy Database is expected to have little to no impact on reconciliation. Some corrections have been outstanding for more than two years. The notification file issues have impacted the CS process. 	
Actions taken to resolve the issue		Completion date
Based on auditor feedback we built additional validation alerts from the NOT files which we import to flag other actions required		20 th November 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Automated Synchronisation of the NOT files will occur and historical updates for the Electricity App will be synced once further development work is carried out		20 th November 2020
		Identified

Provision of information			
Non-compliance	Description		
Audit Ref: 2.2 With: Clause 15.35 From: 22-Jan-19 To: 27-Oct-20	25 corrections for consumption during bridged periods remain outstanding from the previous audit. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	Controls are rated as moderate as they ensure corrections are processed on time most of the time, but there is room for improvement for bridged meters. The impact is assessed as medium overall, because some corrections have been outstanding for more than two years.		
Actions taken to resolve the issue		Completion date	Remedial action status
Historical Corrections have been carried out and the method/timing of corrections communicated to Veritek		First week of November	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Electricity App additional validation and checks for both Legacy and Smart Meters development work completed. Team to have training on use of application.		20 November	

Data transmission	
Non-compliance	Description
Audit Ref: 2.3 With: Clause 20 Schedule 15.2 From: 01-Jan-20 To: 27-Oct-20	BOPE AMI volumes and readings are provided in a zip file attached to an email, which is not password protected. 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 and the impact as low, because almost all metering data is provided via SFTP.</p> <p>Review of the event detail report found 153 active ICPs had BOPE meters at some time during the audit period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have contacted the one ICP which we receive metering data via email and arranged with the Vendor to receive an automated daily file delivery and cancelled the email delivery		13 November	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitor metering data method of receipt		in the future	

Audit trails			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clause 21</p> <p>Schedule 15.2</p> <p>From: 01-Jun-18</p> <p>To: 27-Oct-20</p>	<p>The DRS/MDMS audit logs do not record the individual who imported information into the database.</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 and the impact as low.</p> <p>Audit trails are available and contain the required information, but the person who processed the change is not identifiable within the audit trail. A small number of users have access to the affected system.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We assumed we had fulfilled the requirements when we updated the Switching Audit Logs to clearly indicate the individual user who imported the file for the NT, NW, AN files. This was a significant amount of development work.		Completed	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We note the auditor comment and now understand the requirements with regards to EIEP files provided by MEPs and agents containing HHR interval data. We have internally raised a request for further development work and this is likely to be completed in mid 2021.	Mid 2021	

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 19-Dec-19</p> <p>To: 27-Jul-20</p>	<p>Five bridged ICPs were not re-certified on unbridging.</p> <p>Nine late certifications for reconnected meters.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 Switch Utilities 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 and all were certified at a later date. 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
This Training was overlooked as part of the transition of staff. We will provide further training to our teams and ask them to follow up with metering equipment providers to remind them of the need to complete recertification.		Mid November 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Key to this will be incorporating the checks of certification in the sign up and reconnection process to ensure certification is checked at that point.		By 31/12/2020	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 01-Jan-20 To: 23-Jul-20	303 late status updates to active. 44 late status updates to inactive. 20 late trader updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because they are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement. The risk is low as most updates were completed on time or soon after they were due unless they were backdated corrections.		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> - Late updates due to backlogs/staffing issues will be addressed by streamlining tasks, removing single-person dependency - Difficulties where assistance is required from the IT team will be addressed by establishing clear escalation pathways - MEP nominations being done upon service order completion will be addressed via training to ensure this is done at time of service order creation. 		November 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above		November 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: 16-Aug-20</p> <p>To: 27-Oct-20</p>	<p>ICP 1001267567LC7DB temporarily had a T99 series ANZSIC code applied.</p> <p>Incorrect ANZSIC codes were temporarily assigned for at least 12 ICPs.</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 moderate, because all ANZSIC codes are checked upon customer sign up but there was evidence that some ANZSIC codes are incorrectly recorded.</p> <p>There is no impact on other participants or settlement, but there is a minor impact on the Authority because this information is used for reporting.</p>	
Actions taken to resolve the issue		Completion date
We identified that this was principally from third-party sales channels where incorrect ANZSIC codes were selected, and we will be providing refresher training to those agents to remind them of the importance of correct ANZSIC code selection.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
We will review the AC020 trader compliance report on the last day of each month as part of our submission processes		Starting 31 December

Changes to unmetered load	
Non-compliance	Description
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 02-May-17</p> <p>To: 15-Oct-20</p>	<p>0010426583EL500 had an incorrect unmetered flag and has now switched out.</p> <p>ICPs 0001951000TG7C9 and 1000007422BP18E recorded unmetered load when none was present and were corrected during the audit.</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 are rated as moderate overall. Most unmetered load details were correct, but a small number of exceptions were identified because there no regular validation between the trader and distributor unmetered load details.</p> <p>The impact is low. Corrected data will be provided through the revision process for ICPs 0001951000TG7C9 and 1000007422BP18E. ICP 0010426583EL500 has no impact on submission because the daily kWh was correctly recorded as zero.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have raised a development item internally to trigger automatic validation events for internal teams to check unmetered load when a site with unmetered load is gained, and then every 12 months thereafter.</p> <p>All unmetered loads identified during the audit have been fixed (apart from one who switched out)</p>		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Our Field Services and Billing Coordinator will receive an unmetered load report on a monthly basis from our Billing/Energy Analyst and chase the Metering Companies</p>		Starting 20 November	

Management of “active” status	
Non-compliance	Description
<p>Audit Ref: 3.8</p> <p>With: Clause 17 of Schedule 11.1</p> <p>From: 22-Mar-19</p> <p>To: 27-Oct-20</p>	<p>ICP 0005278970RN79A was reconnected from 22/03/19 but should have remained disconnected until it was reconnected by the customer’s electrician on 26/03/19 because the paperwork confirmed the job was turned down.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are recorded as strong, because only one data accuracy error was identified.</p> <p>The impact is low. Submission data is revised once late updates are completed, and corrections are processed.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Agent was aware that both hard and remote reconnection had failed so no changes made to status.</p> <p>0005278970RN79A ended up being reconnected by customer's own electrician who replaced fuses.</p> <p>We only updated registry status on 24/03/2020 (agent not sure how we were notified of this though).</p>	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We will implement a daily review of deenergised sites with consumption and update statuses where applicable. The above example was an exception and customer had independently arranged access and communication to provisioning was not triggered.	November 2020	

Management of "inactive" status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Jan-20</p> <p>To: 27-Oct-20</p>	<p>Three ICPs had status reason code 1,10 (Electrically disconnected at meter box fuse) applied but should have had 1,8 (Electrically disconnected at pole fuse).</p> <p>At least eight ICPs with inactive consumption did not have status corrections processed, or disconnection and/or reconnection reads had not been entered resulting in consumption being recorded in inactive periods.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>Controls are rated as weak, because they are not sufficient to identify and correct all instances of inactive consumption.</p> <p>The audit risk rating is medium based on the kWh differences identified. The report of ICPs with inactive consumption during the audit period indicated that 285,520.213 kWh of consumption was attributed to the 120 ICPs on the report, indicating potential under submission. Because disconnection and reconnection readings are not consistently entered and the report includes estimated readings, some of this consumption will not have genuinely occurred during inactive periods.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Incorrect reason code: Feedback provided to the agent involved. The ICPs with inactive consumption identified during the audit have had status corrections processed, or disconnection and/or reconnection reads entered. Our process for reviewing ICPs with historic consumption during inactive should ensure this exceptions are addressed as/if they occur moving forward.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Incorrect reason code: Agent confirmed that the wrong option had been chosen in error. Agent will take care in future to ensure the correct reason code is always applied.	Completed	

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 14-Feb-20</p> <p>To: 03-Aug-20</p>	<p>Two ANs had proposed event dates more than ten business days after the NT receipt date.</p> <p>Three late AN files.</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. AN compliance is expected to be achieved if NT files are successfully imported into the Energy Database and processed soon after they are received. Unsuccessful attempted file imports are identified by the Energy Database, but are not consistently actioned promptly, resulting in some non-compliant proposed event dates and late AN files.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Breach Reporting to appropriate teams now implemented as part of a weekly process	Completed	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Breach reporting should identify these as they occur and therefore will be fixed in a timely manner	Completed	

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: 10-Feb-20</p> <p>To: 21-Aug-20</p>	<p>Three late transfer CS files.</p> <p>Incorrect average daily consumption for at least eight transfer CS files.</p> <p>Incorrect last actual read dates for at least two transfer CS files.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are moderate. Most CS files were issued on time, most CS information checked was correct. The method to calculate average daily kWh was updated during the audit period, but system defects which are under investigation are resulting in some incorrect values being applied.</p> <p>The impact on settlement and participants is minor, because the event readings were correct and the average daily kWh differences were less than ± 18 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Files updated manually where appropriate		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
API had a known bug which is has now been fixed and will be monitored to ensure no additional non compliance arising via a monthly review of randomised ICPS		November 2020	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 07-Apr-20</p> <p>To: 24-Jul-20</p>	<p>Seven late RR files.</p> <p>Two late AC files.</p> <p>The RRs for 0424308045LCD00 (09/03/2020) and 0000007471TE5D1 (20/02/2020) were supported by some unvalidated customer readings instead of validated actual readings.</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, because:</p> <ul style="list-style-type: none"> in most cases the sampled RRs were supported by two validated actual readings, but Switch Utilities' policy allows RRs to be supported by one validated actual and one customer reading, and most RR and AC files were issued on time, and the delays were caused by waiting for information, or a temporary issue with workloads which delayed processing of some AC files. <p>The impact is low because, the event readings were correctly recorded, the read type difference has no impact on submission, and the customer readings appeared reasonable.</p>	
Actions taken to resolve the issue		Completion date
Additional training was completed in November to create further awareness on this issue		November 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Breach reporting should identify these as they occur and therefore will be fixed in a timely manner		November 2020
		Identified

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 22-Jan-20 To: 10-Aug-20</p>	<p>Ten late switch move AN files.</p> <p>123 late switch move CS files.</p> <p>ICPs 0042147873PC9D7 (25/03/2020) and 0000029100UN28F (10/08/2020) had the AA (acknowledge and accept) response code applied when AD (advanced metering) was expected.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate.</p> <ul style="list-style-type: none"> AN and CS files are expected to be issued on time if NT and AN files are successfully imported into the Energy Database, and CS failures are investigated and resolved. Unsuccessful attempted file imports and exceptions are identified by the Energy Database; but are not consistently actioned promptly resulting in some late files. AN file content is applied according to a hierarchy and expected to be accurate where files are processed by the Energy Database and the database information is consistent with the registry. The exceptions related to an AN file which was manually processed on the registry, and a metering information discrepancy between the registry and Energy Database. <p>The audit risk rating is low as this has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
Preventative actions taken to ensure no further issues will occur		Completion date
Implementation of a breaching report after training and access to obtaining this. Based on an agreed flag value (number of days before breach), agents will submit a list of ICPs close to breaching to IT to try and resolve the moving of AN/CS files before breach.		02/11/2020
		Identified

Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 of Schedule 11.3</p> <p>From: 03-Apr-19</p> <p>To: 06-Dec-19</p>	<p>Incorrect average daily consumption for at least six switch move CS files.</p> <p>Incorrect last actual read dates for at least three switch move CS files.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are moderate. Most CS files were issued on time, most CS information checked was correct. The method to calculate average daily kWh was updated during the audit period, but system defects which are under investigation are resulting in some incorrect values being applied.</p> <p>The impact on settlement and participants is minor, because the event readings were correct and the average daily kWh differences were less than ± 16 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer to 4.3		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer to 4.3		Completed	

Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
<p>Audit Ref: 4.11</p> <p>With: Clause 12 of Schedule 11.3</p>	<p>Three late RR files.</p> <p>Six late AC files.</p> <p>The RR for 0327269985LC9D7 (08/06/2020) was supported by unvalidated customer readings instead of validated actual readings.</p> <p>0000001165TRE25 (19/02/2020), did not have a final reading recorded which matched the outcome of the RR process.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p>

From: 13-Jan-20 To: 30-Jul-20	Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate, because:</p> <ul style="list-style-type: none"> in most cases the sampled RRs were supported by two validated actual readings, but Switch Utilities' policy allows RRs to be supported by one validated actual and one customer reading, most RR and AC files were issued on time, and the delays were caused by waiting for information, and a temporary issue with workloads which delayed processing of some AC files, and only one read discrepancy was identified. <p>The impact is low because most event readings were correctly recorded, the read type difference has no impact on submission, and the customer readings appeared reasonable. The difference between the reading applied and the agreed switch reading for ICP 0000001165TRE25 (19/02/2020) was 14 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Read discrepancy identified was investigated		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Awareness created to ensure all RRs were supported with 2 actual contractor readings.		October 2020	

Losing trader provision of information - gaining trader switch	
Non-compliance	Description
Audit Ref: 4.13 With: Clause 15 Schedule 11.3 From: 10-Jun-20 To: 19-Aug-20	Four late HH AN files. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	The controls are recorded as strong, because the HH process is automated but there were some delays in processing files directed to work queues.

	The impact on settlement and participants is minor, as all the files were provided between three and five business days late. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have automated the HH switching process.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Review of the Electricity App but any issues will be picked up via the Breach Report	Nov 2020	

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 of Schedule 11.3</p> <p>From: 13-Jan-20</p> <p>To: 08-Jul-20</p>	<p>19 late AW files.</p> <p>Nine late withdrawal cycle resolutions.</p> <p>0452063043LCFAB (07/04/2020) had a NW issued in error.</p> <p>1000000207BP3F2 (05/06/2020) had CX (customer cancellation) withdrawal code applied, but WP (wrong premises) was a better fit.</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 moderate. Workflows are automated but there are sometimes delays in processing files during periods with high workloads. The incorrect NW codes were caused by data processing errors.</p> <p>The impact on other participants is minor, therefore the audit risk rating is low. The two withdrawals sent with incorrect codes were rejected by the other trader.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The Provisioning Team believed that withdrawal codes were pre-populated so the agent actioning the NW could not choose an appropriate code but discussions indicated this not the case and further training to increase awareness provided	November 2020	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
AW withdrawals and NW issues all addressed via the Breach Report or Training and Awareness	November 2020	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24 and 15.13</p> <p>From: 01-Jan-20</p> <p>To: 27-Oct-20</p>	<p>ICP 0000292879WE5FA has submission against the RPS profile only, but the RPS and PV1 profiles are recorded on the registry.</p> <p>15 bridged meters were identified during the audit period. Energy was not quantified in accordance with the code during the bridged periods.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</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 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 estimated to be medium based on the number and nature of exceptions identified, and because corrections for consumption during bridged periods do not consistently occur.</p>	
Actions taken to resolve the issue		Remedial action status
Corrections have been carried out and the method/timing of corrections communicated to Veritek		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Future processes addressed by changes to the Electricity App and training on using this to Provisioning Teams		20 November

Derivation of meter readings			
Non-compliance	Description		
Audit Ref: 6.6 With: Clause 3(1), 3(2) and 5 Schedule 15.2 From: 03-Dec-19 To: 12-Sep-20	Four readings which appear to have been taken by the customer were recorded as actual readings by Wells, and actual readings in the Energy Database. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. Both Wells and Switch Utilities have processes in place to ensure that customer readings are correctly classified. A small number of exceptions were identified. The impact on settlement and participants is minor, because the readings were taken from the meter and were validated by Wells and Switch Utilities.		
Actions taken to resolve the issue		Completion date	Remedial action status
Confirmed with Wells via email that they are sometimes recording customer readings in the "reads" field with a note indicating it is a customer read instead of following their usual process		Advised Wells of the findings on the 16/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Moving forward monthly sanity checks to ensure Wells process has been changed		From November 2020	

Interrogate meters once	
Non-compliance	Description
Audit Ref: 6.8 With: Clause 7(1) and (2) of Schedule 15.2 From: 01-Jan-20 To: 31-Jul-20	106 ICPs were not read during the period of supply. The best endeavours requirement was not met for at least seven of these ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate

	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate, because they are not sufficient to ensure that a reading is received within the period of supply where the period is short.</p> <p>The impact on settlement from an estimate for a short period is minor therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>For those customers which respond, we are organising special reads.</p> <p>For those that don't respond, we are</p> <ul style="list-style-type: none"> - Creating a keypack process for no-access customers. - Having a more robust response to meters that have not been read in a long time – organize special reads etc. - Ensuring best endeavours criteria met for all no-read meters. Making frontline aware of what 'best endeavours' are. 		November 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Setting up a last attempt to contact process via a letter mailed out to customers		Early 2021	

NHH meters interrogated annually	
Non-compliance	Description
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) of Schedule 15.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>The best endeavours requirement was not met for at least seven ICPs not read in the previous 12 months.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate, because they are not sufficient to ensure that the best endeavours requirements will be met for all ICPs.</p> <p>Consumption will be estimated for settlement and the impact is expected to be low, based on read attainment being close to 100% after 12 months.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>For those customers which respond, we are organising special reads.</p> <p>Ensuring best endeavours criteria met for all no-read meters.</p> <p>Making frontline aware of what 'best endeavours' are.</p>		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Implementing a template to so frontline can send a letter to customers as a last resort after extinguishing other contact attempts.</p>		Early 2021	

NHH meters 90% read rate			
Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 29-Feb-20</p>	<p>The best endeavours requirement was not met for at least three ICPs not read in the previous four months.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate, because they are not sufficient to ensure that the best endeavours requirements will be met for all ICPs.</p> <p>Consumption will be estimated for settlement and the impact is expected to be low, based on read attainment being over 99% after four months.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
See above		Completed	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
See above	Early 2021	

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3)</p> <p>Schedule 15.2</p> <p>From: 03-Dec-19</p> <p>To: 12-Sep-20</p>	<p>Apparent customer readings for ICPs 0002925110WFD92 (03/12/19), 0000958958TUE71 (12/09/20) and 0000909065TUD0F (24/02/20 and 22/07/20) were provided by Wells as actual readings and recorded in the Energy Database as actual readings.</p> <p>An actual meter reader reading ICP 0000212320TP100 (06/12/19) was incorrectly classified as a customer reading.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong.</p> <ul style="list-style-type: none"> Most manually entered readings are customer readings and correctly classified. The error occurred because the read type was not clearly specified on the data entry request. Both Wells and Switch Utilities have processes in place to ensure that customer readings are correctly classified. A small number of exceptions were identified. <p>The impact on settlement is expected to be minor. The customer readings were taken from the meter and were validated by Wells and Switch Utilities.</p>	
Actions taken to resolve the issue		Completion date
<p>Confirmed with Wells via email that they are sometimes recording customer readings in the "reads" field with a note indicating it is a customer read instead of following their usual process, Additional training has been provided to the Provisioning Team with regards to classifying reads received.</p> <p>The Provisioning team needs to understand the method for raising tickets - this was an error in the type of request and further training has been provided.</p>		<p>Advised Wells findings on the 16/11/2020</p>
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Moving forward monthly sanity checks to ensure Wells process has been changed	From November 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: 27-Oct-20	AMI meter reading data is rounded on import into the Energy Database, and the rounded data is transferred to DART. 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
Preventative actions taken to ensure no further issues will occur		Completion date
Following the Audit's Recommendation and clarification of the non-compliance issue, we will raise a bug fix with our development team in order for fix the rounding of the data		Early 2021 due to Brown Out Period

Calculation of ICP days	
Non-compliance	Description
Audit Ref: 11.2 With: Clause 15.6	There is no zeroing process for ICP days submissions which resulted in some incorrect NHH and HHR ICP days. One ICP day each was excluded from the ICP days submission because 0000909109TU8E5, 0194357368LC792, 0005269052WA075, 0000547801TP241,

From: Mar-19 r14, Apr-19 r14, May-19 r7, Jul-19 r7, Dec-19 r7	<p>0087824400PC1CA, 0000048697UNC58 and 1000007658BPC45 were supplied for one day, and a final reading was not recorded.</p> <p>Where default forward estimate is applied, an ICP day is not reported for the first day of supply. This is corrected through the revision process once a subsequent reading is received.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk of incorrect ICP days being reported most of the time.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> • where the first ICP day is missed because default forward estimate is applied, corrected data is provided through the revision process once another reading is recorded for the ICP, • a small number of ICPs were supplied for one day, and • not zeroing submissions typically only affects NSPs with a small number of ICPs connected, the difference in ICP days is small and will be washed out once corrections are processed. 		
Actions taken to resolve the issue		Completion date	Remedial action status
1) and 2) Processes now understood and will not be a non-compliance issue moving forward		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Some development is required to our DART reconciliation platform to achieve this change.		Aimed completion date for this review is mid 2021	

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.3 With: Clause 15.7 From: Oct-19, Dec-19, May-20 and Jun-20.	The AV120 report does not consistently reflect the quantity billed for the period. 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, because the report reflects the invoices generated but this is not always consistent with the invoices issued to the customer. The impact is assessed to be low because there is no impact on settlement.	
Actions taken to resolve the issue		Completion date
Processes now understood and will not be a non-compliance issue moving forward		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Feb-20 To: 27-Oct-20	Aggregates file contains submission information. Potential impact: Low Actual impact: Low 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, Switch Utilities is providing submission information as expected.	

Actions taken to resolve the issue	Completion date	Remedial action status
No action to be taken as this is a code error		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 22-Jan-19</p> <p>To: 27-Oct-20</p>	<p>There was some missing submission data including, including:</p> <ul style="list-style-type: none"> unreported consumption during periods with inactive status for at least eight ICPs, and unreported consumption during periods where meters were bridged for at least 39 ICPs. <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls over corrections are rated as weak because processes have been developed but have not been consistently followed while users await training. New detection and correction processes are being implemented for stopped, faulty and bridged meters which are expected to improve the controls to strong.</p> <p>The audit risk rating is medium based on the kWh differences identified. Submission data will be revised once corrections are processed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Corrections have been carried out and the method/timing of corrections communicated to Tara	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Future processes addressed by changes to the Electricity App and training on using this to Provisioning Teams	20 November	

Accuracy of submission information			
Non-compliance		Description	
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 22-Jan-19 To: 27-Oct-20</p>		<p>Some incorrect submission data was provided, including:</p> <ul style="list-style-type: none"> unreported consumption during periods with inactive status for at least eight ICPs, unreported consumption during periods where meters were bridged for at least 39 ICPs, invalid generation of forward estimate for one ICP, historic estimate was calculated based on customer readings provided by Wells for four ICPs, an actual reading was not used to calculate historic estimate because it was incorrectly classified as a customer reading, and agreed switch readings for one ICP were not used to calculate historic estimate because they were not entered. <p>Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 6</p>	
Audit risk rating		Rationale for audit risk rating	
Medium		<p>Controls are assessed to be weak overall.</p> <ul style="list-style-type: none"> The controls over corrections are rated as weak because correction processes have been developed but have not been consistently followed while users await training. The controls over readings are strong, the issues occurred because Wells provided a small number of customer readings as actual readings, which was against their policy. The other incorrect or incorrectly classified readings appear to be isolated issues. <p>The audit risk rating is medium based on the kWh differences identified. Submission data will be revised once corrections are processed.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
<p>1. De-energized sites with consumption are tracked through the Switching UI and reviewed daily</p> <p>2. This is now resolved and requires testing for future bridged sites</p> <p>3. A process exists for creating permanent estimates for meters not recording consumption, but this was not applied</p>		November/December 2020	Identified

<p>in one instance more checks will be conducted to avoid such instances in the future</p> <p>4.Relates to Wells not following their normal process as they classified customers readings as real reads, we informed them of these findings the 16/11/2020</p> <p>5. Provisioning team needs to understand the method for raising tickets - this was an error in the type of request and further training has been provided.</p> <p>6. This instance has been raised with our DB team who are investigating the cause</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	

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: Jan-19, Feb-19, Mar-19</p>	<p>Some estimates were not replaced by revision 14.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because a permanent estimate process is in place and has been followed. Some forward estimate still remains due to errors made when processing the files, and metering information discrepancies.</p> <p>The impact is low. Total forward estimate for the three months reviewed was 2,845 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Processes now understood and will not be a non-compliance issue moving forward , no need a correction for the historical data as those lines get self-fixed when we upload the PE lines in the Energy DB		November 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

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), Oct-Nov 19 (r7) and Jan-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>The controls are recorded as moderate overall, based on my assessment of the read attainment processes (sections 6.8-6.10) and permanent estimate process (section 12.8).</p> <p>The impact is low. Total forward estimate for the three months reviewed was 2,845 kWh.</p>	
Actions taken to resolve the issue		Completion date
Auditors comments are noted, processes are in place for obtaining reads but awareness of the process and timelines required are being reiterated with the team to improve the read attainment processes moving forward		November 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified