

Compliance plan for Yes Power – 2020

Relevant information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 19-Dec-20</p> <p>To: 21-Nov-20</p>	<p>Inaccurate HHR data where ARC is the MEP due to there only being one decimal place.</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 because registry checking ensures data is accurate and the ARC issue of inaccurate data is difficult to avoid without turning away customers.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
ARC meters are being displaced by EDMl smart meters which records HHR data more accurately. The ARC meters/mesh is being dismantled in such a way to minimise disruption to communications so early removal is ineffective. Vector metering under their project "Continuing to replace our ARC smart meter fleet with NGC meters", expects to complete this project by Dec 2023.		Dec 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 01-Dec-19 To: 19-Nov-20	Some late status and trader updates. Potential impact: Low Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong. They have been improved during the audit period they now mitigate risk to an acceptable level. The impact on settlement and participants is negligible; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Business rules and processes have been reviewed and updated to avoid late registry updates.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Provision of information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 04-Aug-20 To: 23-Sep-20	One new connection not updated to the registry within 5 business days. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Business rules and new connection process have been reviewed and updated to avoid late registry updates.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Business rules and new connection process will be reviewed and updated for continuous improvement.		
		Identified

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 06-Jul-20 To: 12-Nov-20	One incorrect ANZSIC code 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 recorded as strong because ANZSIC codes are now confirmed on switch in, and the audit compliance report is checked monthly. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Business rules and processes have been reviewed and updated. ANZSIC codes are checked during switching and now during monthly compliance checks.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Cleared

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: 19-Dec-20</p> <p>To: 19-Nov-20</p>	<p>Incorrect use of the AA switch response code.</p> <p>One late AN file by one day.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 because YES Power has changed the default setting to AD.</p> <p>There is no impact because the presence of AMI metering is a registry field and the content of the AN file is not normally used as a source of information to confirm the presence of AMI.</p>	
Actions taken to resolve the issue		Completion date
Switch AN response code changed to "AD" for AMI metering, "AA" for non-AMI metering and will be overridden for other applicable AN response.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Remedial action status
		Cleared

Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 01-Dec-19</p> <p>To: 19-Nov-20</p>	<p>At least two average daily consumption errors.</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 recorded as strong because the average daily consumption calculation was resolved prior to the audit. The current controls for CS timeliness are strong and no late files have been sent since July 2020.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Business process have been reviewed and updated for switch CS where daily average consumption is calculated accurately.		Jul 2020
Preventative actions taken to ensure no further issues will occur		Completion date

Retailers must use same reading - standard switch		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 17-Jun-20 To: 17-Jun-20	One incorrect RR reading 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 they have been improved since the last audit and they minimise risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Business process for switch RR have been reviewed and updated to accurately calculate the switch read.		July 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Cleared

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 02-Dec-19 To: 15-May-20	Three late NT files. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because staff training and controls have been improved. There have not been any issue since May 2020. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Business rules and processes have been reviewed and updated to avoid late registry updates.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 01-Dec-19 To: 19-Nov-20	One late AN file Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because controls have been strengthened during the audit period. There is little impact because the one file was only two days late.	
Actions taken to resolve the issue		Completion date
Business rules and processes have been reviewed and updated to avoid late registry updates. Switch Summary Report checked daily.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Losing trader determines a different date - switch move		
Non-compliance	Description	
Audit Ref: 4.9 With: Clause 10(2) Schedule 11.3 From: 01-Dec-19 To: 19-Nov-20	Incorrect use of the AA switch response code. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the default is now changed to AD. There is no impact because the presence of AMI metering is a registry field and the content of the AN file is not normally used as a source of information to confirm the presence of AMI.	
Actions taken to resolve the issue		Completion date
Switch AN response code changed to "AD" for AMI metering, "AA" for non-AMI metering and will be overridden for other applicable AN response.		Nov 2020
Preventative actions taken to ensure no further issues will occur		Completion date

Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 01-Dec-19 To: 19-Nov-20	26 late CS files At least three average daily consumption errors. 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 recorded as strong because the average daily consumption calculation has been corrected and the controls for timeliness are now more robust; there have not been any late files since mid-July 2020. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Business rules and processes have been reviewed and updated to avoid late registry updates and provision of accurate information to the registry. Switch Summary Report checked daily.		Jul 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

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: 09-Mar-20	One late AC file Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they have been improved since the last audit and they minimise risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Business rules and processes have been reviewed and updated to avoid late registry updates. Switch Summary Report checked daily.		Jul 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Dec-19 To: 20-Nov-20	Six ICPs not read during the period of supply. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Ad-Hoc reads in place for all NHH meters.		Oct 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Dec-19 To: 20-Nov-20	Seven ICPs not read in the 4-month 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	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Ad-Hoc reads in place for all NHH meters.		Oct 2020
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Jun-20 To: 30-Jun-20	ICP days incorrect for nine NSPs for files sent in one month. 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 because they have been strengthened during the audit period. The impact is assessed to be low, as updated data was provided through the revision process.	
Actions taken to resolve the issue		Completion date
System patch update resolved these grouping issues.		Jul 2020.
Preventative actions taken to ensure no further issues will occur		Completion date
		Cleared

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.3 With: Clause 15.7 From: 01-May-20 To: 31-May-20	Error in electricity supplied file for May 2020. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they have recently been strengthened and will identify these sorts of issues now. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Certain Billed Invoice Statuses was not picked for the Electricity Supplied Report due to manual process. Reporting updated where manual step is now automated.		Jul 2020.
Preventative actions taken to ensure no further issues will occur		Completion date
		Cleared

HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.4 With: Clause 15.8 From: 01-Jan-19 To: 02-Dec-19	HHR aggregates file does not contain electricity supplied information. Errors in aggregates files for 14 ICPs Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because they have been strengthened during the audit period. The impact is assessed to be low, as updated data was provided through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Nil.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Jan-20 To: 31-Jul-20	10 HHR ICPs missing from HHR aggregates and HHR vols files between January and July 2020 due to system issues. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong because they have been strengthened during the audit period. The impact is assessed to be low, as updated data was provided through the revision process.	
Actions taken to resolve the issue		Completion date
System patch update resolved these grouping issues.		Jul 2020
Preventative actions taken to ensure no further issues will occur		Completion date

Allocation of submission information		
Non-compliance	Description	
Audit Ref: 12.3 With: Clause 15.5 From: 01-May-20 To: 31-May-20	Incorrect NSP for one ICP for May 2020 Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong because they have been strengthened during the audit period. The impact is assessed to be low, as updated data was provided through the revision process.	
Actions taken to resolve the issue		Completion date
System patch update resolved these grouping issues.		Jul 2020.
Preventative actions taken to ensure no further issues will occur		Completion date
		Cleared

Non-compliance	Description		
Audit Ref: 13.3 With: Clause 10 Schedule 15.3 From: 01-Nov-19 To: 30-Jun-20	Two NSPs did not meet the 90% threshold for HE for the 7-month revision. Between November 2019 and June 2020 three NSPs did not meet the 80% threshold for HE. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Ad-Hoc reads in place for all NHH meters.		Oct 2020.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	