

Compliance plan for Paua to the People RP Audit– 2020

Material audit change request			
Non-compliance	Description		
Audit Ref: 1.11 With: Clause 16A.11 From: 01-Sept-19 To: 30-Apr-20	Material change audit not undertaken for system change that affected Paua's ability to comply with the code. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as Paua is now clear on what requires a material change and that system changes cannot go into production prior to this. The impact is assessed to be low, as updated data will be provided through the revision process prior by revision 14.		
Actions taken to resolve the issue		Completion date	Remedial action status
Working with Veritek to ratify system changes to date		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have agreed with Veritek to let them know what we are doing and rely on their advice for what requires an major change audit		1/5/2020	

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 05-Jun-18</p> <p>To: 06-Apr-20</p>	<p>ICP 0000123086TRFBA had an incorrect inactive status date applied not corrected from the last audit.</p> <p>CS file content incorrect for one ICP.</p> <p>Four RR requests contained requested readings inconsistent with the HHR data.</p> <p>Some revision files were not provided within the 14-month revision period resulting in corrections not being settled in the market.</p> <p>Three ICPs submitted against the incorrect NSP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for errors.</p> <p>The audit risk rating is low as data discrepancies found have a minor impact on reconciliation.</p>	
Actions taken to resolve the issue		Completion date
<p>We have updated our HHR dataset.</p> <p>Status changes are now done as soon as notifications are received from the MEP regardless of whether the customer reconnects.</p>		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Our system;</p> <ol style="list-style-type: none"> Checks the ICP for attribute changes monthly. The above relate to changes before adopting the new system Status change process above has stopped incorrect status changes <p>Prompts the operator to supply reports to the Reconciliation Managers schedule.</p>		1/5/2020
		Identified

Provision of information			
Non-compliance	Description		
Audit Ref: 2.2 With: Clause 15.35 From: 05-Jun-18 To: 06-Apr-20	Information was not provided as required by the code to meet the revision cycle causing corrections to not be settled to the market. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as Paua has now added functionality that prompts the operator for the revision files required for each submission. The audit risk rating is low corrections not processed will have a very minor impact in the market .		
Actions taken to resolve the issue		Completion date	Remedial action status
We have updated our HHR dataset.		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Our new system prompts the operator to supply reports to the Reconciliation Managers schedule. We now submit reports more regularly.		1/5/2020	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 12-Jul-18 To: 24-Jul-19	Ten late status updates. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls 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 a small number of updates were affected.	
Actions taken to resolve the issue		Completion date
Status changes are now done as soon as notifications are received from the MEP regardless of whether the customer reconnects.		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Status change process above has stopped incorrect status changes		1/5/2020
		Identified

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: 04-Mar-19</p> <p>To: 11-Jul-19</p>	<p>Six late AN files.</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. The process is manual and will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low as five out of the six late AN files were one day late. This will have no material impact on other participants.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Systems development to try to automate as the Switch Breach report is unhelpful in this regard.		8/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We are looking to automate this process to be more compliant.</p> <p>The Registry is unhelpful in providing guidance in when AN and CS switches are due if you use the Switch Breach report. For retailers who use the Web interface this is really unhelpful, and we respectfully suggest that the EA make some changes to the report to help small retailers.</p>		8/2020	

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: 04-Oct-18</p> <p>To: 06-Apr-20</p>	<p>58 late CS files.</p> <p>CS file content incorrect for one ICP.</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 the process is manual and will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low as the majority of the late files were only one to two days late and 99% of the CS files were sent using AMI data which have a high level of accuracy.</p>	
Actions taken to resolve the issue		Completion date
Systems development to try to automate as the Switch Breach report is unhelpful in this regard. We would however like to point out that ~99% of our CS switches are done on the proposed date.		8/2020
Preventative actions taken to ensure no further issues will occur		Completion date
We are looking to automate this process to be more compliant.		8/2020
		Investigating

Retailers must use same reading - standard switch			
Non-compliance	Description		
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 12-Nov-18 To: 08-Oct-19	One late RR file. 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 assessed to be strong as reads are applied correctly and the switch breach report is monitored regularly. The breach risk rating is low, as the only one late RR was identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action can be taken.		1/5/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Not sure what else can be done.		1/5/2020	

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1)</p> <p>Schedule 11.3</p> <p>From: 05-Oct-18</p> <p>To: 25-Mar-20</p>	<p>Two incorrect AN codes send – AD was sent when the PD code was more accurate.</p> <p>No AN file sent for 175 AN switches.</p> <p>Seven late CS files</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 now aware of the different switch timings and will work to these.</p> <p>The impact is assessed as low because the missing AN files has no material impact and only seven CS files were sent date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action can be taken.		1/5/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We are trying to automate the system to remove operator error		8/2020	

Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 04-Oct-18 To: 06-Apr-20	CS file content incorrect for three ICPs (one ICP had both the incorrect average daily consumption and an incorrect estimate). Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as the process is manual and will mitigate risk most of the time but there is room for errors to occur. The audit risk rating is low as the volume of switch moves processed is low so this will have a minor impact to other participants.		
Actions taken to resolve the issue		Completion date	Remedial action status
HHR Reads are consistent with agreed reads.		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
System automation is coming.		8/2020	

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: Clause 12</p> <p>Schedule 11.3</p> <p>From: 17-May-19</p> <p>To: 31-Mar-20</p>	<p>Four RR requests contained requested readings inconsistent with the HHR data.</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 assessed to be moderate as the process is manual and will mitigate risk most of the time but there is room for errors to occur.</p> <p>The breach risk rating is low as the correct read was applied in all instances so there is no impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Nothing.		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have recently upgraded our system to provide a calculated read rather than have to manually get the read from our HHR raw data. Veritek have had visibility of what is calculated (essentially proves data for all fields on the AN and CS).		1/5/2020	

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 29-Sept-18</p> <p>To: 15-Nov-18</p>	<p>One incorrect NW code.</p> <p>One late withdrawal acknowledgement.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Four times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>The audit risk rating is low as only two ICPs were affected.</p>	
Actions taken to resolve the issue		Completion date
No action can be taken.		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Given the uncertain and inconsistent use of NW codes maybe some guidance from the EA might be appreciated.		1/5/2020
		Investigating

Metering information		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 17-May-19 To: 31-Mar-20	Two CS files with incorrect estimated reads. Four incorrect RR reads were provided. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are assessed to be moderate as the process is manual and will mitigate risk most of the time but there is room for errors to occur. The breach risk rating is low as the correct read was applied in all instances so there is no impact on reconciliation.	
Actions taken to resolve the issue		Completion date
HHR data is now corrected for future submissions.		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
We have supplied our estimation engine to Veritek who are happy it is now compliant.		1/5/2020
		Identified

Correction of HHR metering information			
Non-compliance	Description		
Audit Ref: 8.2 With: Clause 19(2) of Schedule 15.2 From: 04-Oct-18 To: 06-Apr-20	Corrections not materially similar to the period with missing data. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as Foxworks has been corrected and additional checks have been put in place to ensure that corrections are processed correctly. The audit risk rating is low as the volume of corrections is very minor and all corrections affected have been recalculated.		
Actions taken to resolve the issue		Completion date	Remedial action status
HHR data is correct for future submissions.		1/5/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We have supplied our estimation engine to Veritek who are happy it is now compliant.		1/5/2020	

HHR Estimation		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 15 of Schedule 15.2 From: 04-Oct-18 To: 06-Apr-20	Estimations did not meet reasonable endeavours. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as Foxworks has been corrected and additional checks have been put in place to ensure that corrections are processed correctly. The audit risk rating is low as the volume of corrections is very minor and all corrections affected have been recalculated.	
Actions taken to resolve the issue		Completion date
HHR data corrected for future submissions		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
We have supplied our estimation engine to Veritek who are happy it is now compliant.		1/5/2020

ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Sept-18</p> <p>To: 01-Dec-19</p>	<p>Inaccurate ICP days were reported for a small number of ICPs due to NSP changes not being processed correctly.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are currently rated as moderate but will be strengthened to strong if the recommendation of checking the ICPs missing (GR090) report is adopted.</p> <p>The impact is assessed to be low, as the number of ICPs affected is small in relation to the market.</p>	
Actions taken to resolve the issue		Completion date
HHR data corrected.		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Our current system is controlling this. The three ICP were incorrectly assigned the NSP manually when we rebuilt our customer tables. It was not picked up because the change happened many months prior.		1/5/2020

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Oct-18</p> <p>To: 01-Dec 19</p>	<p>The HHR aggregates file does not contain electricity supplied information.</p> <p>Three ICPs reconciled to the incorrect NSP.</p> <p>Some submission inaccuracies were identified which have not been submitted within the 14-month revision cycle resulting in corrections not being settled to the market.</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 as they will mitigate risk most of the time but there is room for improvement.</p> <p>The issue relating to content of the aggregates file is an error in the code, Paua is providing submission information as expected.</p> <p>The audit risk rating is low as the volume of ICPs affected will have a very minor impact to the market.</p>	
Actions taken to resolve the issue		Completion date
HHR Corrected and included in submissions where possible.		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
All breaches were old. Our current system is proving robust.		1/5/2020
		Identified

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-Oct-18</p> <p>To: 01-Dec 19</p>	<p>One late submission file was provided in June 2019 for May 2019 Ri.</p> <p>Revisions not routinely being submitted.</p> <p>Some submission inaccuracies were identified which have not been submitted within the 14-month revision cycle resulting in corrections not being settled to the market.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is low as the volume of ICPs affected will have a very minor impact to the market.</p>	
Actions taken to resolve the issue		Completion date
Submission was submitted.		1/5/2020
Preventative actions taken to ensure no further issues will occur		Completion date
See comments above regarding more regular submissions.		1/5/2020
		Identified

Allocation of submission information			
Non-compliance	Description		
Audit Ref: 12.3 With: Clause 15.5 From: 01-Oct-17 To: 01-May-19	Three ICPs submitted against the incorrect NSP. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement. The audit risk rating is low, as this affected only a small number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments that appear at least twice previously regarding these three ICP.		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See comments that appear at least twice previously regarding these three ICP.		1/5/2020	

Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Oct-17</p> <p>To: 31-Dec-19</p>	<p>Some late revision files were provided.</p> <p>Some revision files were not provided within the 14-month revision period resulting in corrections not being settled in the market.</p> <p>Some incorrect submission data was provided.</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 as they mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is low as the volume of ICPs affected will have a very minor impact to the market.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments that appear at least twice previously regarding frequency of submissions		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See comments that appear at least twice previously regarding frequency of submissions		1/5/2020	

Provision of submission information to the RM			
Non-compliance	Description		
Audit Ref: 13.1 With: Clause 8 Schedule 15.3 From: 01-Sept-18 To: 01-May 19	Three ICPs reconciled to the incorrect NSP. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement. The audit risk rating is low as the ICPs were all within the same balancing area therefore the impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
These three ICP have now appeared in at least four breaches all to do with this issue. Please see comments above		1/5/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
These three ICP have now appeared in at least four breaches. Please see comments above		1/5/2020	