

Compliance plan for Nova Energy Limited

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Jul-16</p> <p>To: 31-Mar-20</p>	<p>TODD</p> <p>Some inaccurate data was not corrected as soon as practicable.</p> <p>Profile discrepancy on the day of meter change for upgrades and downgrades.</p> <p>Inaccurate submission for ARC Innovations HHR metering.</p> <p>Hunet</p> <p>Over submission of 465,000 kWh in April 19 and 50,000 kWh in October 19 due to inadequate validation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple 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. The Hunet validation controls require strengthening.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is low. Where statuses are incorrect, the reconciliation process ensures that all consumption is reported. Status inaccuracies can have a minor impact on ICP days submissions.</p> <p>The Hunet validation issue resulted in over submission until the next revision.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Item 1. ICPs 0006053840ALA07, 1002063909LC22F and 1000021444BP3FC incorrect status event dates</p> <p>Action:</p> <ul style="list-style-type: none"> Refer 3.8 & 3.9 <p>Item 2. 1 ICP at status "inactive new connection in progress" (1,12) with an initial electrical connection date populated by the Distributor</p> <p>Actions:</p> <ul style="list-style-type: none"> Resolved <p>Item 3. Active date variance with Initial Electrical connection date</p> <p>Actions:</p>		<p>TODD on-going</p>
		Identified

<ul style="list-style-type: none"> • ICPs 0006053840ALA07 and 1002063909LC22F were found to have incorrect status event dates applied which were not corrected through TODD's validation processes prior to the audit. • Refer 3.8 & 3.9 <p>Item 6. Distributor indicates embedded generation present with RPS profile</p> <p>Actions:</p> <ul style="list-style-type: none"> • Four ICPs were timing differences, and one ICP 0000710336WP2BE was confirmed not to be generating yet. • Refer 6.1 <p>Item 7. Active ICP with cat 9 and UML="N"</p> <p>Actions:</p> <ul style="list-style-type: none"> • ICP 0001681263PCCEC was confirmed to be metered, and it appears the MEP's records are incorrect. • Refer 3.4 • Nova have identified an opportunity to create reporting and add to the existing data integrity daily reporting suite to support CAT9, Null & zero ICPs. Implemented 30 May 2020 <p>Item 8. Active ICP with no MEP recorded and UML="N"</p> <p>Actions:</p> <ul style="list-style-type: none"> • 14 ICPs MEP nominated & accepted. <ul style="list-style-type: none"> ○ 12 ICPs registry populated by MEP, ○ 2 ICPs updated and completed. NGCM have now updated registry. <p>Item 10. Meter cat 3 with residential ANZSIC code</p> <p>Actions:</p> <ul style="list-style-type: none"> • 1 ICP the code was incorrect and updated during audit. • Refer 3.6 <p>Item 13. Incorrect ANZSIC code applied</p> <p>Actions:</p> <ul style="list-style-type: none"> • 9 ICPs had incorrect ANZSIC codes, 8 were corrected during audit. • ICP 0000012956WE988 customer is a meat processor and wholesaler, but the H440000 (accommodation) ANZSIC code is still applied on the registry. Refer 3.6 correction completed <p>Item 16. ICPs with incorrect shared unmetered load</p> <p>Actions:</p> <ul style="list-style-type: none"> • ICP 0014603340ELCF7 had incorrect trader unmetered load information recorded in Orion and the registry. Refer 3.7 & 5.1 <p>Item 18. Arc category 2 meters submitted as HHR, with compensation factors of 100 or greater</p> <p>Actions:</p>		
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<ul style="list-style-type: none"> • 2 ICPs with ARC metering, with compensation factors of 100 or greater. • Nova has recently become aware that low usage on HHR reconciled Arc meters may have the potential to shift time periods if certain usage thresholds aren't met. • Nova supports an industry wide approach that considers the costs and benefits of the most appropriate response to this situation • Refer 12.7 • Nova seek EA clarification and guidance on this issue <p>Profile Discrepancy. Profile discrepancy on the day of meter change for upgrades/downgrades</p> <ul style="list-style-type: none"> • Nova will continue current submission processes around upgrades/downgrades. This is a technical non-compliance that arises due to the registry being unable to reflect an ICP being NHH & HHR on the same day. • As noted by the auditor there is no material impact on reconciliation. <p>Hunet Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> • Hunet amended large meter reading error report cycle from daily to monthly basis since Hunet began dealing with HHR ICPs. <p>Actions:</p> <ul style="list-style-type: none"> • Hunet had 2 cases where actual reads from Wells were used in initial report and corrected in R01 as it turned out to be a misreading upon investigation. It took less than 20 days to correct the readings. 	<p>Hunet 30 May 2020</p>	
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Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> Detailed outcomes are covered in the applicable sections of the audit document <p>Hunet</p> <ul style="list-style-type: none"> Hunet will implement a new validation tool that detects potential mis-readings as soon as readings from Wells arrive 	<p>TODD on-going</p> <p>Hunet 30 May 2020</p>	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 14-May-19</p> <p>To: 19-Dec-19</p>	<p>TODD</p> <p>13 late certifications for new connections</p> <p>101 late certifications for reconnections.</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 moderate. Processes are in place to identify metering certification issues and replace affected meters.</p> <p>The impact on settlement is recorded as minor because installations with expired or interim certification may be less accurate than certified metering installations.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> 13 late certifications for new connections <ul style="list-style-type: none"> All 13 occurrences of late certifications are due to late registry updates not late certifications. Nova have processes in place to identify, instigate and monitor actions across certification and recertification on TODD traded ICPs. 101 late certifications for reconnections 		On-going
		Identified

<ul style="list-style-type: none"> ○ Nova continue to work with MEPs on deployment programmes, BAU field jobs, turn downs due to additional electrical work required and consumer contact challenges etc ○ These challenges are on-going across the industry 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> • Non-compliance will continue to occur until all uncertified metering across the industry has been certified. • Nova updated our service request template in 2019 to capture if uncertified metering was identified which results in a request to the MEP to attend and recertify • Nova will continue to reinforce with our MEPs through service level agreements and on-going performance reviews, certification of ICPs moving to active or changing to active is a critical and improved timeline(s) with registry updates to be focused on • Nova have implemented further data integrity controls across CAT9, null or zero sites to improve review and resolution outcomes • ICP 0001681263PCCEC will be addressed as and when COVID-19 restrictions allow 	On-going & May 2020	

Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 22-Jan-19</p> <p>To: 18-Dec-19</p>	<p>TODD, Hunet and WISE</p> <p>Some registry information was not updated within 5 business days of the event.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls over the timeliness and accuracy of status and trader updates are strong. The late updates were mainly caused by delays in receiving paperwork, or corrections where Nova had confirmed the initial update was incorrect.</p> <p>Hunet and WISE controls are robust and errors are identified and corrected by both Hunet and WISE as soon as possible.</p> <p>The audit risk rating is low as the vast majority of updates to the registry occur within the required timeframe.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD – Hunet - WISE</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> TODD, Hunet & Wise continue to display on-going commitment to timely status updates which is reflected in the compliance results. In instances where backdated corrections are made, we elect to provide complete and accurate information and acknowledge this creates contention with Clause 10 Schedule 11.1. 	On-going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD, Hunet & WISE</p> <ul style="list-style-type: none"> On-going work with our industry stakeholders to improve compliance time frames and where required we elect to provide complete and accurate information over timeliness. The focus will continue to be on accuracy of event dates and complete and accurate information. 	On-going	

Provision of information to the registry manager	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 31-Jan-19</p> <p>To: 02-Dec-19</p>	<p>TODD</p> <p>34 late updates to active status for new connections.</p> <p>ICP 0006053840ALA07 has active status recorded from 08/08/19 but should have active status recorded from 06/08/19.</p> <p>ICP 1002063909LC22F has active status recorded from 17/07/19 but should have active status recorded from 15/07/19.</p> <p>Hunet</p> <p>Late registry update for one new connection.</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 over the timeliness and accuracy of new connection status updates are strong.</p> <ul style="list-style-type: none"> • The late updates were caused by delays in receiving paperwork, or corrections where TODD had confirmed the initial update was incorrect. • The inaccurate updates appear to be isolated and caused by manual data entry errors, which were not corrected because the ICPs later switched out to another trader. <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted. Comments:</p> <ul style="list-style-type: none"> • 34 late updated to active status for new connections <ul style="list-style-type: none"> ○ Timely updates to the registry continue to remain a focus. Nova focus on achieving a high level of compliance with timely updates and on-going strong relationships with stakeholders to influence improved outcomes. • ICP 0006053840ALA07 & ICP 1002063909LC22F incorrect status recorded <ul style="list-style-type: none"> ○ Both instances were human error. The ICPs switched before the incorrect updates could be corrected. <p>Hunet Response: Non-Compliance accepted. Comments:</p> <ul style="list-style-type: none"> • 1 new connection late registry update due to delays receiving paperwork from the MEP. • Hunet actively monitor and engage with our stakeholders to gain complete and accurate information in a timely manner. <p>Actions:</p> <ul style="list-style-type: none"> • 1 new connection late registry update <ul style="list-style-type: none"> ○ Update was made as soon as paperwork received from the MEP. 		On-going	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> Data integrity reporting will be reviewed and updated to retain focus on ICPs that are updated incorrectly, if the discrepancy continues to exist it will continue to be visible until resolved Nova will continue to actively work on updating status' in a timely manner. Refresher training was provided to the wider team May 2020 and continues to be a team discussion and focus area on-going. <p>Hunet</p> <ul style="list-style-type: none"> We will continue to actively work on updating status in registry at the earliest timeframe possible 	<p>TODD on-going & May 2020, 30 June 2020</p> <p>Hunet On-going</p>	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 9 (1(k) Schedule 11.1</p> <p>From: 19-Dec-19</p> <p>To: 03-Apr-20</p>	<p>TODD</p> <p>Nine ICPs had incorrect ANZSIC codes applied, and eight were corrected during the audit. ICP 0000012956WE988's customer is a meat processor and wholesaler, but the H440000 (accommodation) ANZSIC code is still applied on the registry. ICPs 0000551085NR750 and 1000012524BP6C4 have incorrect trader event dates applied on the registry.</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>Controls are strong. There are preventative controls are in place to ensure that ANZSIC codes are initially recorded accurately, and monitoring controls to detect invalid ANZSIC codes and discrepancies.</p> <p>The audit risk rating is low this has no direct impact on submission accuracy.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Due to a task changeover within the team during the audit period this has contributed to an increase in 		<p>April 2020</p> <p>Identified</p>

<p>incorrect ANZSIC codes being applied and associated trader event date misalignment.</p> <ul style="list-style-type: none"> 9 ICPs had incorrect ANZSIC codes, 8 were corrected <ul style="list-style-type: none"> Incorrect ANZSIC codes applied due to human error. ICP 0000012956WE988 incorrect <ul style="list-style-type: none"> Incorrect ANZSIC code applied due to human error ICPs 0000551085NR750 and 1000012524BP6C4 incorrect trader event dates <ul style="list-style-type: none"> Incorrect trader event dates occurred due to human error <p>Actions:</p> <ul style="list-style-type: none"> All corrections have been completed April 2020 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> Nova recognises the importance on ensuring correct and accurate ANZSIC codes are applied and reviewed regularly Refresher training provided to the wider team and process updated to revisit the need for correct and accurate ANZSIC codes and associated event date updates. 	30 May 2020	

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: 01-Jul-16</p> <p>To: 03-Mar-20</p>	<p>TODD</p> <p>The trader daily unmetered kWh was incorrect on the registry for ICP 0000540556TU6C9. A correction was processed during the audit.</p> <p>The readings recorded against the unmetered register for 0000540556TU6C9 do not start from the switch in date, and do not include all expected unmetered load.</p> <p>An incorrect trader event date was recorded for the addition of unmetered load on the registry for 0014603340ELCF7. 01/07/16 was recorded instead of 17/09/19.</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. They are usually sufficient to ensure that unmetered load discrepancies are identified and resolved.</p> <p>The audit risk rating is low. The data for 0000540556TU6C9 has been partially corrected and the impact on submission is 93 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Billing team processes currently only check for load variance between Orion and Registry Process and knowledge gap within the team have caused the inaccuracies <p>Actions:</p> <ul style="list-style-type: none"> ICP 0000540556TU6C9 error with switch in date and expected unmetered load corrected April 2020 <ul style="list-style-type: none"> Invoicing has been reversed and corrected ICP 0014603340ELCF7 incorrect trader event date corrected April 2020 		April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Billing team process checks for load variance between Orion and Registry and has been updated to also include event date errors. Process update implemented April 2020 		April 2020	

Management of "active" status	
Non-compliance	Description
<p>Audit Ref: 3.8</p> <p>With: 17 Schedule 11.1</p> <p>From: 05-Dec-19</p>	<p>TODD</p> <p>ICP 0000050781CPF0C was active against two customer accounts for 05/12/19 to 06/12/19. The ICP later switched out effective from 06/12/19.</p> <p>ICP 0006053840ALA07 has active status recorded from 08/08/19 but should have active status recorded from 06/08/19.</p> <p>ICP 1002063909LC22F has active status recorded from 17/07/19 but should have active status recorded from 15/07/19.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p>

To: 06-Dec-19	Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong, because there are good preventative and detective monitoring controls in place. The inaccurate updates appear to be isolated and caused by manual data entry errors. Two were not corrected because the ICPs later switched out to another trader.</p> <p>The audit risk rating is low based on the number and nature of the discrepancies found.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> • ICP 0000050781CPF0C active status recorded incorrectly & switched out <ul style="list-style-type: none"> ○ The issue is both a timing issue and human error. The ICP was mid switch when the account was closed and ICP moved to vacant process. When the switch out process completed the incorrect date/read was used. Had the setting up of the vacant process not occurred, the incorrect date/read would not have been used. ○ The switching process flow was interrupted by the vacant process being completed. ○ The impacts of this are seen across 4.10 & 4.16 • ICP 0006053840ALA07 active status recorded incorrectly <ul style="list-style-type: none"> ○ Refer 3.5 • ICP 1002063909LC22F active status recorded incorrectly <ul style="list-style-type: none"> ○ Refer 3.5 <p>Actions:</p> <ul style="list-style-type: none"> • ICP 0000050781CPF0C corrections completed May 2020 		May 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> • Review of data integrity reporting will be undertaken, and improvements implemented 		Q3	

Management of "inactive" status			
Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 12-Feb-19</p> <p>To: 12-Apr-20</p>	<p>TODD</p> <p>ICP 1000021444BP3FC incorrectly had inactive status recorded between 12/02/19 and 27/02/19. Consumption occurred between the 12/02/19 and 28/02/19 reads. Because the date that consumption began cannot be pinpointed, the status should be corrected from the earliest date that consumption could have occurred from, which is 12/02/19.</p> <p>WISE</p> <p>Disconnected ICPs not changed to inactive status unless they are disconnected for more than three days.</p> <p>Potential impact: Low</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 assessed to be moderate, because most ICPs have the correct status and event dates recorded, but there is room for improvement.</p> <p>The impact was assessed to be low. There is no impact on volume submissions, and a very minor impact on ICP days submissions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted</p> <p>Comments:</p> <ul style="list-style-type: none"> ICP 1000021444BP3FC status was updated at the point in time that aligned with the date the read indicated consumption was identified. Prior to this date Nova were unaware that electricity could be conveyed at the ICP. There is no way to pinpoint exactly when and where the consumption occurred during the inactive period nor does the code explicitly suggest that the event date should be a date that pre-dates when the trader was made aware that electricity flowed. The status updates reflected when Nova confirmed actual readings (either via meter reader or AMI reads) that consumption flowed through the meter. <p>Actions:</p> <ul style="list-style-type: none"> We have updated the one identified ICP event date to reflect when electricity "could" have been conveyed. This does not impact on volume submissions 		TODD April 2020	Identified

<p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> WISE will conduct a review of the registry status update processes with the intent to update the process to change the ICP status to inactive within +1 day of disconnection <p>Actions:</p> <ul style="list-style-type: none"> Updated process to change ICP status to inactive within +1 day of disconnection to be delivered by 30 May 2020 	WISE May 2020	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> Our focus will continue to be on accuracy of event dates and complete and accurate information. Our data integrity reporting remains a focus area reviewed regularly to identify opportunities for refinement. <p>WISE</p> <ul style="list-style-type: none"> Our focus will continue to be on accuracy of event dates and complete and accurate information. We will monitor disconnected ICPs on an on-going basis and where required, look for opportunities for improvements. 	<p>TODD on-going</p> <p>WISE on-going</p>	

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: 06-Mar-19</p> <p>To: 06-Jan-20</p>	<p>TODD</p> <p>One late CS file.</p> <p>CS average daily consumption is based on the average daily consumption over the previous year, not the last actual read to read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded.</p> <p>Two transfer CS files were issued with CS premises lines only.</p> <p>WISE</p> <p>5 late CS files.</p> <p>2 incorrect switch event meter readings.</p> <p>Incorrect calculation of average daily consumption</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p>

	Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate: <ul style="list-style-type: none"> • The process to determine average daily kWh is not consistent with the Registry Functional Specification but does provide a reasonable estimate of average daily consumption. • A small number of CS files contained missing information, and TODD will investigate to determine why. • There were only a small number of late files. • The incorrect reading issue for WISE is now resolved. The audit risk rating is low: <ul style="list-style-type: none"> • The average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP. • Both switches where the CS file contained missing information were later withdrawn, and the incorrect reading issue for WISE is now resolved. 		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Comments: <ul style="list-style-type: none"> • One late CS file <ul style="list-style-type: none"> ○ ICP 0000051576TR73DCS was removed from our systems automated processes to administer additional steps. This is similar error that was identified in 2018 audit. • CS files – incorrect daily consumption <ul style="list-style-type: none"> ○ Memo dated 18 June 2019 received regarding Average Daily Consumption ○ On review of memo and the outcomes to the 2018 audit we believed we were compliant. This is incorrect. ○ Requirements will be developed to align with the industry specifications. ○ This was an oversight on our behalf. Anticipated resolution Q4 • Two Transfer CS files with premise lines only <ul style="list-style-type: none"> ○ See Recommendation outcomes 4.3 		TODD on-going & Q4	Identified

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: 6(1) and 6A Schedule 11.3</p> <p>From: 22-May-19</p> <p>To: 23-Sep-19</p>	<p>TODD</p> <p>Two late RR files for transfer switches.</p> <p>Potential impact: Low</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>The controls over the read renegotiation process are strong.</p> <p>The audit risk rating is low. The late RR files are expected to improve data accuracy, and revised reconciliation data is washed up once the RR process is completed.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Two late RR files for Transfer switches <ul style="list-style-type: none"> ICP 0000230355WED17 customer was unable to provide key access due to being off shore ICP 0008812169MLB32 gaining access due to water taxi availability Historical access issues both with Nova and previous provider contributed to an extended length of time to identify the gaining reads were incorrect and gain 2 validated meter readings. 		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
<ul style="list-style-type: none"> Nova will continue with on-going refresher training, review processes and where possible look for opportunities for improvement. 		On-going

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: 02-Jul-19</p> <p>To: 04-Jul-19</p>	<p>Hunet</p> <p>9 late NT files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated a strong in normal circumstances. The events surrounding this group of ICPs were an exception.</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
<p>Hunet</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> 9 late NT files <ul style="list-style-type: none"> When implementing processes to support setting up TOU accounts in the billing system an small technical issue presented which caused the late NT files <p>Actions:</p> <ul style="list-style-type: none"> 9 late NT files <ul style="list-style-type: none"> The billing system TOU set up issue was resolved 1 July 2019 		July 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Hunet will continue focusing on optimizing its standards by identifying and monitoring its performance and opportunities for improvements. 		On-going	

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: 10(1) Schedule 11.3</p> <p>From: 05-Jun-19</p> <p>To: 02-Sep-19</p>	<p>WISE</p> <p>One AN file with a date greater than 10 business days from NT data</p> <p>Two AN files with event dates earlier than the proposed date</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 they mitigate risk to an acceptable level.</p> <p>Two of the ICPs switched on the date proposed in the NT file but one ICP switched on the date sent in the AN file.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>WISE</p> <p>Response:</p> <p>Non-Compliance not accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> One AN file with date > 10 BD from NT data <ul style="list-style-type: none"> Issues identified pre material change audit. The process was updated in September 2019 to resolve this. Two AN files with event dates earlier than proposed date <ul style="list-style-type: none"> Issues identified pre material change audit. The process was updated in September 2019 to resolve this 		September 2019	Identified WISE confirmed that the issue has been resolved.
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> The updates made in September 2019 have corrected occurrences of this moving forward WISE system automation implemented to source and add event date 		September 2019	

	•		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> • Incorrect average daily consumption <ul style="list-style-type: none"> ○ Refer 4.3 • ICP 0000559123NRAC4 incorrect last actual read <ul style="list-style-type: none"> ○ Combination of timing and human error has caused this issue. A change was made the day prior the ICP switch to ensure accurate consumption was invoiced. The process was not followed accurately which has caused the non-compliance. • ICP 0000050781CPF0C incorrect last actual read and date <ul style="list-style-type: none"> ○ Refer 3.8 • 20 switch moves CS files with premise line only <ul style="list-style-type: none"> ○ Refer point 3 @ 4.3 <p>Hunet</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> • Incorrect date of last read on one ICP <ul style="list-style-type: none"> ○ An actual read from Wells was identified as an error upon investigation. <p>Actions:</p> <ul style="list-style-type: none"> • Hunet has updated the switching file generation system to retrieve the correct read date of last read <ul style="list-style-type: none"> ○ Update implemented April 2020 <p>WISE</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> • Calculation methodology for average daily consumption not compliant refer 4.8 <ul style="list-style-type: none"> ○ WISE process for determining estimated daily kWh calculation due to the nature of the daily “read to read” periods is accurate, and this is evident by the analysis from the audit outcomes. 		<p>TODD Refer 4.3, 3.8</p> <p>Hunet April 2020</p> <p>WISE Refer 4.8 & September 2019</p>	Identified

<ul style="list-style-type: none"> WISE's CS was not always using the switch read for the actual reading on their last day of responsibility. Refer 4.3 <p>Actions:</p> <ul style="list-style-type: none"> Calculation methodology for average daily consumption will be reviewed and monitored CS process issue – switch read <ul style="list-style-type: none"> WISE have reviewed the process so that the most recent readings will be used in CS files moving forward. implemented September 2019 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> Refer 3.8, 4.3 & recommendation <p>Hunet</p> <ul style="list-style-type: none"> Hunet has updated the switching file generation system to retrieve the correct read date of last read <ul style="list-style-type: none"> Update implemented April 2020 <p>Wise</p> <ul style="list-style-type: none"> Updated switching process to ensure most recent reads are used in CS file implemented September 2019 	<p>TODD on-going</p> <p>Hunet April 2020</p> <p>WISE September 2019</p>	

Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>From: 04-Mar-19</p> <p>To: 29-Nov-19</p>	<p>TODD</p> <p>Eight late RR files for switch moves.</p> <p>Potential impact: Low</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>The controls over the read renegotiation process are strong.</p> <p>The audit risk rating is low. The late RR files are expected to improve data accuracy, and revised reconciliation data is washed up once the RR process is completed.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> 8 late RR files for switch moves <ul style="list-style-type: none"> 6 late RR files were due to access issues and inside meters 3 ICPs vacant sites 3 ICPs with no one home during business hours <p>Actions:</p> <ul style="list-style-type: none"> Nova maintains following best practices and only sends files outside of timeframe as required to correct invoicing for customers. Attempts are made to gain actual reads as quickly as possible upon switch in. 0.16% of the RR files sent on NTMI switches during the audit period were sent past compliance timeframes. 	On-going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> As above 	On-going	

Gaining trader informs registry of switch request - gaining trader switch	
Non-compliance	Description
<p>Audit Ref: 4.12</p> <p>With: Clause 14 Schedule 11.3</p> <p>From: 01-Jul-19</p> <p>To: 04-Jul-19</p>	<p>Hunet</p> <p>Five backdated NT files.</p> <p>Potential impact: Low</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 these switches were originally to TODD, then they were withdrawn in order that Hunet could become the trader.</p> <p>There was no impact because all parties agreed to the trader change.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Hunet Response: Non-Compliance accepted. Comments: <ul style="list-style-type: none"> 5 backdated NT files were impacted by the same issue described in section 4.7 	July 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> Hunet will continue focusing on optimizing its standards by identifying and monitoring its performance and ways for improvement. 	On-going	

Losing trader provision of information - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.13 With: Clause 15 Schedule 11.3 From: 14-Mar-19 To: 13-Dec-19	TODD Nine ICPs had response code AD (advanced metering) invalidly applied. None of the ICPs had the AMI flag selected at the time of the switch. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak, because the AN response codes are automatically assigned by Orion and most HH ANs were issued with an incorrect response code. The impact on settlement and participants is minor, metering details can be confirmed from other information recorded on the registry.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Comments: <ul style="list-style-type: none"> 9 ICPs response code AD invalidly applied 	On-going	Identified

	<ul style="list-style-type: none">• most NW codes were correctly selected, and• the late files were processed as soon as possible.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none">• 95 late NW files<ul style="list-style-type: none">○ Nova considers it is in the best interest of the customer to correct data to accurately invoice and that we comply with Clause 11.2 of part 11 “to provide complete and accurate information”.• 3 ICPs were issued NWs in error<ul style="list-style-type: none">○ A previously employed staff member used the NW process in error and not in alignment with our switching processes and protocols <p>WISE</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none">• WISE accept the non-compliance on one ICPs incorrect NW code used <p>Actions:</p> <ul style="list-style-type: none">• WISE provided refresher training to staff members on the use of correct NW codes May 2020 <p>Hunet</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none">• 1 incorrect NW identified, and training provided to staff member 31 March 2020• 1 late NW due to NTMI and Hunet unable to contact customer at time the switch was processed. Flatting situation and ICP was moved to GEOL which resulted in NW being processed late.		<p>TODD on-going</p> <p>WISE May 2020</p> <p>Hunet March 2020</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD</p> <ul style="list-style-type: none">• Review and update process documentation		<p>TODD 30 May 2020 & on-going</p>	

<ul style="list-style-type: none"> Provider the wider team refresher training 		
<p>WISE</p> <ul style="list-style-type: none"> WISE provided refresher training to staff members on the use of correct NW codes May 2020 	WISE May 2020	
<p>Hunet</p> <ul style="list-style-type: none"> Staff training provided 31 March 2020 	<p>Hunet</p> <p>31 March 2020</p>	

Metering information			
Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 06-Dec-19</p> <p>To: 06-Dec-19</p>	<p>TODD</p> <p>For one CS file the switch event reads did not reflect the actual reading or best estimate of an actual reading on the event date.</p> <p>WISE</p> <p>3 inaccurate switch event meter readings.</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, this was an isolated exception for TODD which occurred because the ICP had a customer change mid switch and some data was transferred between the customer accounts inaccurately.</p> <p>WISE's CS process has now changed to include more recent actual readings, and the controls are strong.</p> <p>The impact on settlement and participants is minor; the kWh difference in readings was small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> 1 CS file ICP 0000050781CPF0C switch event reads did not reflect actual reading or best estimate on the event date <ul style="list-style-type: none"> Refer 3.8 <p>Actions:</p>		TODD May 2020	Identified

<ul style="list-style-type: none"> 1 CS file switch event reads did not reflect actual reading or best estimate on the event date <ul style="list-style-type: none"> Correction completed May 2020 <p>WISE</p> <p>Response: Non-Compliance not accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> 3 inaccurate switch event meter readings <ul style="list-style-type: none"> WISE have reviewed the process so that the most recent readings will be used in CS files moving forward. Implemented September 2019 refer 4.10 & 4.3 <p>Actions:</p> <ul style="list-style-type: none"> 3 inaccurate switch event meter readings <ul style="list-style-type: none"> See 4.10 & 4.3 	WISE September 2019	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> As above <p>WISE</p> <ul style="list-style-type: none"> WISE implemented an update to the switching process in September 2019. <ul style="list-style-type: none"> Refer 4.10 & 4.3 	<p>TODD May 2020</p> <p>WISE September 2020</p>	

Maintaining shared unmetered load	
Non-compliance	Description
<p>Audit Ref: 5.1</p> <p>With: Clause 11.14</p> <p>From: 19-Oct-19</p> <p>To: 31-Mar-20</p>	<p>TODD</p> <p>The trader daily unmetered kWh was incorrect on the registry for ICP 0000540556TU6C9. A correction was processed during the audit.</p> <p>The readings recorded against the unmetered register for 0000540556TU6C9 do not start from the switch in date, and do not include all expected unmetered load.</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. They are usually sufficient to ensure that unmetered load discrepancies are identified and resolved.</p> <p>The audit risk rating is low. The data for 0000540556TU6C9 has been partially corrected and the impact on submission is 93 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> ICP 0000540556TU6C9 daily unmetered kWh incorrect on registry & readings recorded against the unmetered register do not start from the switch in date or include expected unmetered load <ul style="list-style-type: none"> See response @ 3.7 		April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Billing team process checks for load variance between Orion and Registry has been updated to also include event date errors. Process update implemented April 2020 		April 2020	

Electricity conveyed & notification by embedded generators	
Non-compliance	Description
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 17-Dec-18</p> <p>To: 30-Mar-20</p>	<p>TODD</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 12 ICPs.</p> <p>ICP 0000710336WP2BE temporarily had an incorrect event date for its generation profile recorded on the registry and was corrected during the audit.</p> <p>WISE</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 4 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

<ul style="list-style-type: none"> WISE does not initiate the bridging of meters except in extremely rare circumstances where energy supply is required for health and safety reasons. WISE agrees that a bridged meter is not a desirable outcome however at times these are also outside our control i.e. as a result of a failed remote reconnection from an alt trader. WISE take measures to act reasonably. WISE has a thorough process in place which describes the actions to be taken if a bridged meter is identified or initiated by Wise. 	
Preventative actions taken to ensure no further issues will occur	Completion date
<p>TODD</p> <ul style="list-style-type: none"> Nova will continue to work with MEPs through service level agreements and on-going regular operational meetings to ensure bridging of meters continues to be an undesirable outcome for Nova. Nova has a thorough process in place which describes the actions to be taken if a bridged meter is identified or initiated by Nova. 	TODD on-going
<p>WISE</p> <ul style="list-style-type: none"> WISE will continue to work with MEPs through service level agreements and on-going regular operational meetings to ensure bridging of meters continues to be an undesirable outcome. 	WISE on-going

Derivation of meter readings	
Non-compliance	Description
<p>Audit Ref: 6.6</p> <p>With: Clause 5 of Schedule 15.2</p> <p>From: 01-Jan-19</p> <p>To: 31-Mar-20</p>	<p>TODD</p> <p>Customer and photo readings are not specifically validated against at least two readings not provided by the customer.</p> <p>One customer reading for ICP 0000017604CP1F8 was recorded as a customer reading but had not been validated against a set of readings from another source.</p> <p>Potential impact: Low</p> <p>Actual impact: Medium</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 overall. The controls over most of the process are robust, but customer photo readings are consistently treated as validated readings where they have not been validated against at least two validated actual readings provided by a source other than the customer.</p> <p>The audit risk rating is low. Further actual readings were obtained for ICP 0000017604CP1F8, confirming that it should pass validation. Only one of the ten customer and photo reads checked had not been appropriately validated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response: Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Customer and Photo readings not validated against at least two reading not provided by the customer <ul style="list-style-type: none"> See recommendation 6.6 1 customer reading ICP 0000017604CP1F8 was recorded as a customer reading but had not been validated against a set of readings from another source <ul style="list-style-type: none"> See recommendation 6.6 		May 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Recommendation accepted and updated process to be completed 30 May 2020 		May 2020	

NHH meter reading application	
Non-compliance	Description
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-May-19</p> <p>To: 31-Mar-20</p>	<p>TODD</p> <p>In a CS file for ICP 0000050781CPF0C, the switch event reads did not reflect the actual reading or best estimate of an actual reading on the event date.</p> <p>WISE</p> <p>Incorrect readings provided for three ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The incorrect switch reading for ICP 0000050781CPF0C was an isolated exception which occurred because the ICP had a customer change mid switch and some data was transferred between the customer accounts inaccurately.</p> <p>The issue with WISE CS reads is now resolved.</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
<p>TODD Response: Non-Compliance accepted. Comments:</p> <ul style="list-style-type: none"> • ICP 0000050781CPF0C switch event reads did not reflect actual reading or best estimate of an actual reading on the event date <ul style="list-style-type: none"> ○ Refer point 3 of section 4.10 <p>WISE Response: Non-Compliance accepted. Comments:</p> <ul style="list-style-type: none"> • Incorrect readings provided for three ICPs <ul style="list-style-type: none"> ○ WISE have reviewed the process so that the most recent readings will be used in CS files moving forward. implemented September 2019 refer 4.10 & 4.3 		<p>TODD May 2020</p> <p>WISE September 2019</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD</p> <ul style="list-style-type: none"> • As above <p>WISE</p> <ul style="list-style-type: none"> • Refer 4.3, 4.10 		<p>TODD May 2020</p> <p>WISE September 2019</p>	

Interrogate meters once			
Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 09-Dec-18</p> <p>To: 31-Mar-20</p>	<p>TODD</p> <p>Exceptional circumstances were not proven for at least four ICPs not read during the period of supply.</p> <p>WISE</p> <p>Exceptional circumstances were not proven for one ICP not read during the period of supply.</p> <p>Hunet</p> <p>Exceptional circumstances were not proven for one ICP not read during the period of supply.</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 and expected to improve to strong once the revised process for TODD is implemented. A small number of exceptions were identified for Hunet and WISE.</p> <p>The audit risk rating is low as the number of ICPs not read during the period of supply is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Nova accept that exceptional circumstances were not proven Historically the sources used to identify opportunities to improve read attainment were complex and relied on multiple data sources. The read attainment process is actively under review <ul style="list-style-type: none"> Nova have identified a phased improvement approach that will: <ul style="list-style-type: none"> Identify the discrepancies Design single source of reliable data Implement automated workflow mechanisms Further enhance and utilise SMS capabilities to mitigate read attainment issues at the on-set 		TODD Q4	Identified

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Nov-18</p> <p>To: 31-Oct-19</p>	<p>TODD</p> <p>Exceptional circumstances were not proven for at least two ICPs unread in the 12 months ending 31/10/19.</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 and expected to improve to strong once the revised process is implemented.</p> <p>The audit risk rating is low as the percentage of ICPs read at 12 months is number of ICPs not read during the period of supply is low.</p>	
Actions taken to resolve the issue		Completion date
<p>TODD</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Exceptional circumstances were not proven for 2 ICPs unread in 12month period <ul style="list-style-type: none"> Refer 6.8 		Q4
Preventative actions taken to ensure no further issues will occur		Completion date
<ul style="list-style-type: none"> Refer 6.8 		Q4
		Identified

Meter data used to derive volume information			
Non-compliance	Description		
<p>Audit Ref: 9.2</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Jan-19</p> <p>To: 31-Mar-20</p>	<p>TODD</p> <p>Raw meter data is rounded upon receipt and not when volume information is created.</p> <p>WISE</p> <p>Raw meter data is rounded upon receipt and not when volume information is created.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>There are no controls to prevent rounding of raw meter data, the system is designed to round as soon as the data arrives.</p> <p>There is very little impact because no metered consumption information is “missing”, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD</p> <p>Comments:</p> <ul style="list-style-type: none"> To be compliant with this clause would potentially suggest a non-compliance with Schedule 11.3 clause 5 & 11 and clause 6 (Traders must use same reading <ul style="list-style-type: none"> A switch event meter reading is defined to mean a validated meter reading. A switch event meter reading cannot be a validated meter reading if the validated meter reading is unrounded and the switch event meter reading is rounded, these are now two readings that are not one and the same. Nova holds the meter readings and validated meter readings as rounded in the billing system. The raw meter data (received from the MEPs) is held unrounded external to the billing/reconciliation system and rounded at the point of import and meter read creation within the billing system <p>Actions:</p> <ul style="list-style-type: none"> The interpretation of the code needs to be reviewed and clarified by the EA 		TODD N/A	Disputed

<p>WISE</p> <p>Response:</p> <p>Non-Compliance not accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Raw meter data rounded upon receipt & not when volume information created <ul style="list-style-type: none"> WISE previously applied rounding to raw meter data until the last audit. However, it was first noted in last year's Audit, and since October 2019, raw meter data is applied unrounded. Raw meter data is used for reconciliation, and when billing to a customer, it is calculated as the value with the decimal point discarded. In addition, the switch event meter reading, like other retailers, uses the value with the decimal point discarded. 	<p>WISE October 2019</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD</p> <ul style="list-style-type: none"> The interpretation of the code needs to be reviewed and clarified by the EA <p>WISE</p> <ul style="list-style-type: none"> As above 	<p>TODD N/A</p> <p>WISE October 2019</p>	

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: Jul-19</p> <p>To: Nov-19</p>	<p>TODD</p> <p>Some ICPs billed in AXOS were double counted in the AV120 submissions.</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, as they are sufficient to mitigate the risk of incorrect as billed data for most ICPs.</p> <p>The impact is rated as low because there is no impact on market submission, and a small proportion of ICPs were affected.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Comments: <ul style="list-style-type: none"> The task of invoice xml creation was moved from the time-of-day system to the CRM billing system for this set of time-of-day billed ICPs during 2019. The unintended impact of this was that the billed transactions (containing the volumes) from the time-of-day system did not cease as this system continued to be used for the volume calculation part of invoicing. The result of these transactions not ceasing meant that volumes continued to be reported in the AV-120 from the time-of-day system, as well as being reported in the AV-120 from the CRM billing system where the invoice creation task now resides. If adjusted to remove these double-reported volumes, the variance between billed and submission for the year ending November 2019 is 0.8% (submitted greater than billed). 	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> The inclusion of these duplicate volumes from the time-of-day system was ceased in December 2019. Nova will washup AV-120 files to the RM. 	December 2019 & Q3	

HHR aggregates information provision to the reconciliation manager	
Non-compliance	Description
Audit Ref: 11.4 With: Clause 15.8 From: Dec-18 To: Mar-19	TODD and Hunet HHR aggregates file does not contain electricity supplied information. 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 issue relating to content of the aggregates file is an error in the code, submission data is provided as expected.	
Actions taken to resolve the issue		Completion date
TODD - Hunet Response: Non-Compliance accepted. Comments: <ul style="list-style-type: none"> HHR aggregates file doesn't contain electricity supplied information Nova will continue to prepare the HHR aggregates file at an ICP level based on submission information as required by the Reconciliation Manager. Nova supports a Code change to allow the aggregate files used in practice within the industry to remain unchanged. 		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
TODD - Hunet <ul style="list-style-type: none"> Nova continue to support a code change 		N/A
Identified		

Accuracy of submission information	
Non-compliance	Description
Audit Ref: 12.7 With: Clause 15.12 From: 19-Oct-19 To: 31-Mar-20	TODD The readings recorded against the unmetered register for 0000540556TU6C9 do not start from the switch in date, and do not include all expected unmetered load. 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 over accuracy of submission data are strong, only one exception was identified. The audit risk rating is low. The data for 0000540556TU6C9 has been partially corrected and the impact on submission is 93 kWh.

Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Comments: <ul style="list-style-type: none"> ICP 0000540556TU6C9 <ul style="list-style-type: none"> Refer 3.7 Arc Innovations meters settled as HHR <ul style="list-style-type: none"> Refer 2.1 	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> ICP 0000540556TU6C9 <ul style="list-style-type: none"> Refer 3.7 Arc Innovations meters settled as HHR <ul style="list-style-type: none"> Refer 2.1 	N/A	

Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 of Schedule 15.3 From: 1-Dec-18 To: 31-Dec-18	TODD The accuracy threshold was not met due to FE being estimated too high in relation to balancing area DUNEDINDUNEG (December 18 r1). Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, as they are sufficient to ensure almost all data is within the prescribed thresholds. Initial data is replaced with revised data and washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Comments:	March 2019	Identified

<ul style="list-style-type: none"> Nova has historically achieved a strong level of compliance regarding its accuracy of Forward estimates. As shown in the auditor's commentary above, only 2 balancing areas were outside of the threshold prescribed. Additionally, at an aggregate level the average percentage change between the initial revision against subsequent revisions was well within the 15% threshold - indicating robustness in Nova's Forward estimate process. <p>Actions:</p> <ul style="list-style-type: none"> Following our previous audit where Nova registered a non-compliance under this clause, Nova have used end of month reads for ICPs where AMI data is available. This has resulted in Nova's initial submissions becoming more accurate as the proportion of Historic estimates increase and Forward estimates decrease. Additionally, increased consumption based on starting and ending end of months reads reduces the effect of profiling, further reducing the variance between the initial submission and subsequent revisions. Nova incorporated this change for submission months starting February 2019 onwards. The auditor has noted in the audit report that differences have settled with none occurring since February 2019. 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> Nova will continue entering end of month reads for ICPs where AMI data is available. This will ensure a high degree of accuracy in the initial submission and smaller variances between the initial and subsequent revisions. Nova recognise it will be on-going to achieve full compliance with this clause due to factors such as legacy meters, mid-month reads and the effects of aggressive profiling. 	March 2019	

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: Jun-Aug 19 r3</p>	<p>Hunet</p> <p>Historic estimate thresholds were not met for R3 for a small number of months and revisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple 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 the risk of not meeting the threshold most of the time. The NSPs where the target wasn't met have a low total number of ICPs.</p> <p>The audit risk rating is low because the overall percentage of HE is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Hunet</p> <p>Response:</p> <p>Non-Compliance accepted.</p> <p>Comments:</p> <ul style="list-style-type: none"> Historic estimate thresholds not met for R3 for small number of months & revisions <ul style="list-style-type: none"> The threshold was not met for some NSPs for revisions 3 and small number of ICPs are connected at the NSPs. <p>Actions:</p> <ul style="list-style-type: none"> We have been actively working on gaining an actual read at the earliest timeframe as possible 		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Hunet will continue focusing on optimising its standard by identifying and monitoring its performance and opportunities for improvement. 		On-going	