

Compliance plan for Bosco Connect

Title: Relevant information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 01-Jun-17 To: 26-Feb-18	Some registry discrepancies identified. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as moderate as not all discrepancies are being checked for. Only one ICP was affected by the missing validations, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The one ICP has been fixed.		April 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Daily monitoring has been implemented.		May 2018	

Title: Electrical Connection of Point of Connection			
Non-compliance	Description		
Audit Ref: 2.11 With: Clause 10.33A From: 01-Jun-17 To: 26-Feb-18	Eight ICPs not certified within five business days of electrical reconnection. 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 rated as weak as there are no controls in place to ensure reconnected ICPs with uncertified metering are certified within five business days. The audit risk rating is low as this has no direct impact on reconciliation		

Actions taken to resolve the issue	Completion date	Remedial action status
BOSCO is looking to implement the Auditors recommendation and investigate changing processes or refusing customers transfers. As noted by the auditor, it is MEP non-compliance that is triggering Retailer non-compliance.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
EA should consider this as an industry wide issue where compliance by a retailer is potentially unachievable.	2020	

Title: Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 of schedule 11.1 From: 01-Jun-17 To: 26-Feb-18	Registry not updated within 5 business days of the event. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as controls will mitigate risk most of the time, but there is room for errors to occur. The audit risk rating is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Bosco is investigating as multiple changes may be required. Bosco has followed the auditor recommendation and reduced the threshold to 50kWh and will assess if this is sufficient to improve compliance for this obligation.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	May 2019	

Title: Provision of information to the registry manager			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 9 of schedule 11.1 From: 18-Dec-17 To: 19-Dec-17	Registry information not provided within 5 business days of commencement of supply for one ICP. 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 rated as strong as the process whilst manual has high visibility and is managed closely. The audit risk rating is low as only one ICP was updated one day late.		
Actions taken to resolve the issue		Completion date	Remedial action status
Operator error for the one ICP. Coaching has been provided and ICP corrected.		April 2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing coaching		Ongoing	

Title: Changes to unmetered load	
Non-compliance	Description
Audit Ref: 3.7 With: Clause 9(1)(f) of Schedule 11.1 From: 15-Mar-13 To: 13-Apr-18	Unmetered load was not recorded for ICP 1000010602BPA5D. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3

Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as weak as this is not checked as part of the registry discrepancy process.</p> <p>The audit risk rating is low as only one ICP was affected and this has been corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This has been corrected.		April 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reports have been implemented to identify sites of this nature.		May 2018	

Title: Losing trader response to switch request and event dates - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 & 4 of schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 12-Apr-18</p>	<p>Incorrect sending of the AA AN response code for sites with AMI metering for transfer switches.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as moderate as the controls will mitigate errors most of the time.</p> <p>I have recorded the audit risk rating as low as there is no direct effect on settlement outcomes in relation to this clause.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This is a system issue (Ezy Business is sending the AA automatically) An IT ticket has been raised However this is an issue that EA is assessing through the technical switch group.		October 2018	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Dependant upon the result of the IT ticket however Bosco would not look to implement changes until the Authority has completed their assessment through the switch technical group.	April 2020	

Title: Losing trader must provide final information - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: Clause 5 of schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 26-Feb-18</p>	<p>Incorrect last read date for ICPs that close on an estimate.</p> <p>Actual read incorrectly labelled as an estimate.</p> <p>Five late CS files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as weak as the same issues have been identified in the previous audit and therefore a lack of controls is indicated.</p> <p>I have recorded the audit risk rating as low as the volume of ICPs affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This was operator error and also required system logic to be updated. This error has been corrected.		April 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing operator coaching and possible change to process to be investigated.		Ongoing	

Title: Retailers must use same reading - standard switch		
Non-compliance	Description	
Audit Ref: 4.4 With: Clauses 6(1) and 6A Schedule 11.3 From: 01-Jun-17 To: 26-Feb-18	A read request sent based on one validated meter reading. An RR file was accepted but the reads were not updated. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as weak as the read requests accepted but not updated indicate controls are weak. The audit risk rating is low as the volume of ICPs affected are small.	
Actions taken to resolve the issue		Completion date
This was operator error. Updated training and coaching has been provided to the operator.		April 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing coaching		Ongoing

Title: Non-half hour switch event meter reading - standard switch	
Non-compliance	Description
Audit Ref: 4.5 With: Clauses 6(2) and (3) Schedule 11.3 From: 16-Jan-18 To: 26-Jan-18	Two RRs rejected in error. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as moderate, because the non-compliance was caused by a training issue.</p> <p>The audit risk rating is low as the volume of ICPs affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This was operator error. Updated training and coaching has been provided to the operator.		April 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing coaching		Ongoing	

Title: Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10 of schedule 11.3</p> <p>From: 01-Jun-17</p> <p>To: 26-Feb-18</p>	<p>Incorrect sending of the AA AN response code for sites with AMI metering for move switches.</p> <p>45 late CS files.</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>I have rated the controls as moderate as controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>I have recorded the audit risk rating as low as the volume of ICPs affected is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
System enhancement is required to rectify AN code issue. An IT ticket has been raised.		October 2018	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Dependent upon the IT ticket	April 2019	

Title: Losing trader must provide final information - switch move			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 11 of schedule 11.3 From: 01-Jun-17 To: 20-Feb-18	Incorrect CS file content. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as weak as the same issues have been identified in the previous audit and therefore a lack of controls is indicated. I have recorded the audit risk rating as low as the volume of ICPs affected is small in the overall market.		
Actions taken to resolve the issue		Completion date	Remedial action status
A system enhancement required. An IT ticket has been raised.		October 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
This will be dependent upon the outcome of the IT ticket		May 2019	

Title: Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 01-Jun-17 To: 20-Feb-18	An RR sent without two validated reads being gained. Four late RR files. An RR file was accepted but the reads were not updated. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	I have rated the controls as moderate as controls will mitigate risk most of the time. The audit risk rating is low as the volume of ICPs affected is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was operator error. Updated training and coaching has been provided to the operator and the error corrected.		April 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing coaching		Ongoing	

Title: Withdrawal of switch requests	
Non-compliance	Description
Audit Ref: 4.15 With: Clauses 17 & 18 of schedule 11.3 From: 01-Jun-17 To: 26-Feb-18	23 switch withdrawals sent later than two months of the event date. Four switch withdrawals sent with the incorrect code. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>I have rated the controls as moderate as controls mitigate risk most of the time, but a small number of human errors were evident.</p> <p>The audit risk rating is low as the volume of backdated switch withdrawals is low, but processing of these increases submission accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Late AW responses were sent late due to Operator error. Breach report is run daily and now we have stronger controls in place to assess it.		April 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional reporting in place		May 2018	

Title: Distributed unmetered load			
Non-compliance	Description		
<p>Audit Ref: 5.4</p> <p>With: Clauses 11(1) of schedule 15.3, 10.14 & 15.13</p> <p>From: 01-Jun-17</p> <p>To: 12-Apr-18</p>	<p>Database and submission errors found</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as weak as the errors were found in the database and submission.</p> <p>The risk is medium due to the impact on submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Bosco will be undertaking more regular reviews of its singular UML site for discrepancies.		October 2018	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
BOSCO is also looking to document UML processes for different scenarios including on-boarding to reduce discrepancies between databases and ensure consistency. BOSCO is also not actively seeking to add further ICP's to it's DUMML database.	June 2019	

Title: Electricity conveyed & notification by embedded generators	
Non-compliance	Description
<p>Audit Ref: 6.1 With: Clause 10.13</p> <p>From: 01-Jun-17 To: 12-Apr-18</p>	<p>While meters were bridged, energy was not metered and quantified according to the code for nine ICPs. For three ICPs with generation, energy was not quantified according to the code. For one ICP with generation, electricity was not metered in accordance with the code.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate 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 reduce the risk most of the time. The audit risk rating is assessed to be low, as a small number of ICPs are affected. Bridging only occurs where a soft reconnection cannot be performed. In all examples reviewed, corrections had been appropriately processed. Affected ICPs were switched out within seven months of distributed generation being identified. Bosco's normal process is not to accept customers with distributed generation. If a distributed generation customer is found, they arrange for the customer to switch the ICP to another retailer as soon as possible.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>For the bridged meters the correct consumption was calculated as noted in 8.1. This process was followed to ensure a customer was receiving supply.</p> <p>For the other issues the correct internal process was followed and a backdated switch out occurred.</p> <p>For the one ICP it was a network issue and BOSCO is still awaiting their resolution.</p>	October 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A new report is going to be introduced to identify sites that are non-compliant.	May 2019	

Title: Derivation of meter readings	
Non-compliance	Description
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Jun-18</p> <p>To: 12-Apr-18</p>	<p>Datacol did not conduct or record checks for phase failure.</p> <p>Some meter condition information obtained when meters are read manually is not reviewed or acted upon.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are rated as weak, because some meter condition information provided is not reviewed or acted upon.</p> <p>Phase failure is often not indicated on non-AMI meters. It is expected there would be a relatively small number of meters read by Datacol where phase failure is present or visible. Datacol had not provided meter reading services to Bosco since March 2018. The impact of this non-compliance is low.</p> <p>83% of Bosco's active ICPs have AMI metering installed; 17% are read manually by agents. Of those only a small proportion are expected to have meter condition issues present. Bosco's other validation checks are likely to identify some meter condition issues. The residual risk is assessed to be low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Bosco currently investigating the process to identify cause and remediation and control steps.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Dependant upon the outcome of the investigation	May 2019	

Title: Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Jun-17 To: 10-Apr-18	No reporting in place to quantify ICPs not interrogated at least once during the period of supply. Potential impact: Low Actual impact: Low Audit history: One previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are weak, because no reporting on ICPs not interrogated at least once during the period of supply is available. The impact is assessed as low because four and 12 month read attainment rates are high.	
Actions taken to resolve the issue	Completion date	Remedial action status
New reporting has been implemented.	May 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
as above.	N/A	

Title: NHH meters interrogated annually			
Non-compliance	Description		
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Mar-18 To: 12-Mar-18	The January 2018 meter reading frequency report was submitted late. Potential impact: Low Actual impact: None Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, this appears to be an isolated late return.		
Actions taken to resolve the issue		Completion date	Remedial action status
Bosco was made aware of this issue by the Authority and responded within 30mins of being aware.		April 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was an exception to normal procedures and unlikely to occur again.		N/A	

Title: NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Jun-17 To: 31-Jan-18	The best endeavours requirement was not met for nine ICPs unread for four months. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, because they are sufficient to ensure that most ICPs supplied for four months will receive at least one actual read. The risk is rated as low, a small number of ICPs were affected, and overall read attainment rates are high with close to 100% of ICPs read every four months.		

Actions taken to resolve the issue	Completion date	Remedial action status
Under investigation. Bosco notes close to 100% has been obtained.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Dependant upon the investigation	May 2019	

Title: Correction of NHH meter readings			
Non-compliance	Description		
<p>Audit Ref: 8.1</p> <p>With: Clause 19(1) Schedule 15.2</p> <p>From: 01-Jun-17</p> <p>To: 12-Apr-18</p>	<p>Four stopped meters did not have corrections processed to estimate consumption during the stopped period.</p> <p>Four ICPs with consumption while inactive did not have status corrections processed.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</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, as they are sufficient to ensure that most corrections are processed. Corrections for stopped or defective meters are not processed, and corrections for consumption while inactive are not consistently processed.</p> <p>The impact for stopped meters is assessed to be low, all affected ICPs were domestic and consumption during the stopped period was estimated to be low. The consumption while inactive which has not been reported is estimated to be low.</p>		
Actions taken to resolve the issue	Completion date	Remedial action status	
Same as 6.1. Under investigation. Some of these ICP's are in Edgumbe and is being queried with the Network.	October 2018	Investigating	
Preventative actions taken to ensure no further issues will occur	Completion date		
Dependant upon the investigation	May 2019		

Title: Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 28-Dec-17 To: 28-Dec-17	Actual read incorrectly labelled as an estimate. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as weak as the same issue with CS file content has been identified in previous audits and therefore a lack of controls is indicated. I have recorded the audit risk rating as low as one ICP is affected.	
Actions taken to resolve the issue		Completion date
The switch read was originally estimated and was subsequently corrected using smart meter data		May 2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A		N/A
Remedial action status		
Cleared		

Title: Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Jun-18 To: 12-Apr-18	AMI event information not adequately monitored. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Bosco is monitoring and actioning emailed event information.	

Actions taken to resolve the issue	Completion date	Remedial action status
Bosco is currently working with MEPS to confirm the definition of event information, then request a report from our smart meter partners Metrix and AMS relevant to Bosco	May 2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above. Further functionality may need to be introduced.	May 2020	

Title: HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
Audit Ref: 11.4 With: Clause 15.8 From: June 2017 To: April 2018	HHR aggregates file does not contain electricity supplied information. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1		
Actions taken to resolve the issue	Completion date		
Low	The issue relating to content of the aggregates file is an error in the code, Bosco is providing submission information as expected.		
Preventative actions taken to ensure no further issues will occur	Completion date	Remedial action status	
As identified by the auditor, this is an error in the EA code See above. BOSCO would request the risk rating be removed due to this code error.	2020	Disputed	
Actions taken to resolve the issue	Completion date		
EA needing to resolve the code error	2020		

Title: Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-Jun-17</p> <p>To: 12-Apr-18</p>	<p>For three ICPs with generation, energy was not metered and quantified according to the code.</p> <p>Four ICPs with consumption while inactive did not have status corrections processed.</p> <p>Four stopped meters did not have corrections processed to estimate consumption during the stopped period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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, as they are sufficient to ensure that most data is correctly reported.</p> <p>Corrections for stopped or defective meters are not processed, and corrections for consumption while inactive are not consistently processed. The impact for stopped meters is assessed to be low, all affected ICPs were domestic and consumption during the stopped period was estimated to be low. The consumption while inactive which has not been reported is estimated to be low.</p> <p>If a distributed generation customer is found, they arrange for the customer to switch the ICP to another retailer as soon as possible.</p>	
Actions taken to resolve the issue		Completion date
Under investigation		October 2018
Preventative actions taken to ensure no further issues will occur		Completion date
To be determined upon investigation completion.		May 2019

Title: Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Jun-18</p> <p>To: 12-Apr-18</p>	<p>Four corrections for consumption while inactive, and four corrections for stopped or faulty meters were not processed.</p> <p>For three ICPs with generation, energy was not metered and quantified according to the code.</p> <p>For two read changes, the accepted reads were not recorded and used for submission.</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 most submission data is accurate but there is some room for improvement.</p> <p>The impact is assessed to be low, and once corrected revised data will be submitted.</p>	
Actions taken to resolve the issue		Completion date
Related to 6.1		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
N/A		N/A
Investigating		

Title: Permanence of meter readings for reconciliation	
Non-compliance	Description
<p>Audit Ref: 12.8</p> <p>With: Clause 4 of Schedule 15.2</p> <p>From: 01-Oct-16</p> <p>To: 31-Oct-16</p>	<p>Some estimates were not replaced by revision 14.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, and the missed submission check appears to be isolated. The impact is low, total forward estimate was 1358 kWh for October 2016, and related to four ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Bosco have a control in the form of a 14 month estimate report. The single non-compliance was due to operator error. This operator has been coached.		May2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing coaching if the issue re-occurs.		Ongoing	

Title: Forward estimate process			
Non-compliance	Description		
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: Oct 2017	The accuracy threshold was not met for all months and revisions. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, as they are sufficient to ensure data is within the accuracy threshold most of the time. Initial data is replaced with revised data and washed up.		
Actions taken to resolve the issue		Completion date	Remedial action status
This could potentially be addressed by reviewing our forward estimate calculation algorithm. Given that the differences were very close to the threshold further investigation will occur before a course of action can be finalised.		October 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Under investigation		May 2019	

Title: 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: October 2016 (r14)</p>	<p>Historic estimate thresholds were not met for one revision.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate because in most cases the thresholds were met, and processes are in place to make estimated readings permanent.</p> <p>The audit risk rating is low, because Bosco were close to the target in all cases.</p>	
Actions taken to resolve the issue		Completion date
This is caused by 14 month estimates issue identified by 12.8. As advised this resulted in further coaching of a staff member.		May 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing coaching		Ongoing
		Identified