

Compliance plan for Flick Energy Limited

Title: Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Dec-17</p> <p>To: 16-Nov-18</p>	<p>46 ICPs had incorrect profiles assigned and 44 ICPs had incorrect submission types assigned for NHH periods submitted as HHR using the HHY profile.</p> <p>Three ICPs had incorrect statuses recorded on the registry for some days.</p> <p>The data was corrected during the audit.</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>Controls are rated as strong because they are sufficient to ensure that most information is recorded correctly.</p> <ul style="list-style-type: none"> The profile and submission type data accuracy issues all related to ICPs that switched in with NHH metering and had incorrect profiles and submission types recorded for the NHH period. Flick has corrected the data and put improved procedures in place. Three of the 34 disconnected ICPs checked had incorrect active dates, these appeared to be isolated errors. <p>The risk rating is low; all ICPs met the requirements of the profile and were submitted as HHR and the incorrect data has been updated on the registry.</p>	
Actions taken to resolve the issue		Completion date
<p>Profiles and submission types has been corrected for all the 46 ICPs identified through this audit.</p> <p>The incorrect status for all the 3 ICPs identified through this audit has been corrected.</p> <p>The approved HHY profile has been revisited and amendment requests submitted to EA has now been approved. The recent approved amendment profile has been forwarded to the participant auditor.</p>		5/12/2018
		Cleared

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Compliant procedures which includes monthly internal audit has been put in place to avoid any further occurrence of this issue.</p> <p>A robust Refresher training has been provided to the Field team on this process on 5/12/2018.</p> <p>A weekly QA has been scheduled for the Field team which involves assessing the assignment of profiles and allocation of submission type</p>	Date 5/12/2018	

Title: Arrangements for metering equipment provision			
Non-compliance	Description		
<p>Audit Ref: 2.13</p> <p>With: Clause 10.36</p> <p>From: 11-Jun-18</p> <p>To: 02-Oct-18</p>	<p>No MEP arrangements are in place with Delta, LMGL, or Trustpower.</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 as strong, MEP arrangements are in place with the MEPs for almost all Flick ICPs.</p> <p>The impact is low, 17 ICPs were temporarily affected. In the event that there was an issue with one of the meters, Flick would bring forward the meter replacement date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>MEP contract is now in place with LMGL and progress has been made with Delta and Trustpower for arrangement of MEP agreements.</p> <p>The smart meter program which entails acceptance of NHH meters owned by Trustpower, LMGL and Delta has been put on hold until all agreements are in place.</p>		6/12/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>MEP validation check has been put in place for all manual acquisition of NHH ICPs. Please note that an automated process is already in place for MEP validation during acquisition of HHR ICPs.</p> <p>A weekly QA has been scheduled which involves assessment of MEP validation</p> <p>The MEP validation assessment has also been included in the scheduled monthly internal audit for the Field team.</p>	4/12/2018	

Title: Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Dec-17</p> <p>To: 25-Sep-18</p>	<p>79 late status updates.</p> <p>76 late MEP nominations.</p> <p>95 late trader updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement.</p> <p>The risk is low as most updates were completed on time or soon after they were due. The late trader updates checked were found to relate to corrections. Staff training has been completed to improve event date accuracy and prevent events from being backdated unnecessarily.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Most of the late status update and MEP nomination updates were due to the trader event date not being updated when nominating MEP or updating status. This was a training issue.		29/11/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A robust training has been completed on registry updates on 29/11/2018.</p> <p>A weekly QA has been scheduled which includes assessment of the registry update process.</p> <p>The assessment of this process has also been included in the scheduled monthly QA for the Field team.</p>	29/11/2018	

Title: Provision of information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 9</p> <p>Schedule 11.1</p> <p>From: 15-Jan-18</p> <p>To: 08-May-18</p>	<p>Four late status updates for new connections.</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 adequate to ensure that the registry is updated on time most of the time, but there is room for improvement.</p> <p>The risk is low as most updates were completed on time or soon after they were due.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Refresher training has been provided to the team which included monitoring the timeliness of registry updates.		3/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The assessment of this process has been included in the scheduled monthly internal audit for the Field team.		3/12/2018	

Title: ANZSIC codes			
Non-compliance	Description		
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 01-Dec-17 To: 16-Nov-18	Incorrect ANZSIC codes were recorded on the registry for seven ICPs. Potential impact: Low Actual impact: Low Audit history: Twice 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 that most ICPs have the correct ANZSIC codes recorded. The audit risk rating is low, because the ANZSIC codes have been corrected where necessary.		
Actions taken to resolve the issue		Completion date	Remedial action status
All incorrect ANZSIC codes identified through this audit has now been corrected.		28/11/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
A monthly process has been put in place to check that ANZSIC codes are consistent with the pricing and load group The accuracy of the ANZSIC code will also be assessed through the scheduled monthly QA for the Field team.		3/12/2018	

Title: Management of "inactive" status	
Non-compliance	Description
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 13-Feb-18 To: 04-Sep-18	Three ICPs were incorrectly recorded as inactive on the registry when they were active. All have since been corrected. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, because the inactive status is normally applied correctly, but errors may occasionally occur due to the manual nature of registry updates.</p> <p>The impact is low, because three ICPs with incorrect statuses on some days were identified and all had subsequently been corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The three ICPs identified with incorrect status through this audit has been corrected		5/12/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Refresher training has been provided to the Field team on 5.12.2018.</p> <p>The assessment of status update process has been included in the scheduled monthly QA for the Field team.</p>		5/12/2018	

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 and 4</p> <p>Schedule 11.3</p> <p>From: 04-Jan-18</p> <p>To: 09-Sep-18</p>	<p>Nine transfer switches had incorrect AN response codes applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls over AN responses are moderate. The codes are selected manually and further training has been provided to assist staff to select the correct codes.</p> <p>The impact is assessed as low. Whether AMI metering is present can normally be determined from other registry information.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Refresher training has been provided to switch team on use of correct AN code.</p> <p>This process has been automated effective 10/12/2018 which would see a decrease in this error.</p>		23/11/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
A weekly QA has been scheduled for the switch team which involves assessment of the AN code The assessment of this process has also been included in the monthly internal audit for the switch team. The AN response has now been automated effective 10/12/2018. This should eliminate most of the errors going forward.	23/11/2018	

Title: Losing trader must provide final information - standard switch			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 25-Dec-17 To: 04-Sep-18	Four late CS files for transfer switches. Some incorrect CS content. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate now that improved monitoring of switch timeliness has been implemented. CS files are created manually on the registry based on information in Telemetry and there is some room for errors to occur as data is transferred. The impact is assessed as low, most files were sent on time and most CS content was correct. The total volume difference identified was 24 kWh.		
Actions taken to resolve the issue		Completion date	Remedial action status
Process of CS file submission through registry is in the testing phase of process automation. We will see a decrease in error rate as each automation stage progresses.		1/3/2018 (estimated completion time)	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A Robust training has been completed with the Switch team</p> <p>A weekly QA has been scheduled which involves assessing the CS file content and timeframes.</p> <p>The assessment of this process is also covered in the scheduled monthly internal audit as the automation of this process progresses, we will see a decrease in the error rate.</p>	6/12/2018	

Title: Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Dec-17</p> <p>To: 16-Nov-18</p>	<p>One late RR file.</p> <p>One RR file contained an incorrect reading.</p> <p>14 ICPs did not have the agreed switch reading recorded in Telemetry.</p> <p>One AC file was invalidly rejected.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are assessed to be moderate overall, because most of the time Flick will apply the same reading as the other trader. In certain circumstances it is likely that Flick will not apply the agreed switch reading, including:</p> <ul style="list-style-type: none"> • switch outs where Flick has actual AMI data and the agreed switch read differs from this • switch ins where the difference between the CS read and AMI data is less than ± 5 kWh • switch ins where the difference between the CS read and AMI data is not identified for more than five days after the switch is completed • switch ins where an RR is rejected but processing the correct read will result in a large volume difference for customer billing. <p>The audit risk rating is medium, the issues could have a moderate impact on settlement outcomes, other participants, and consumers if not addressed. Flick intends to review and automate its RR and AC processes, and document improved procedures.</p>	

Actions taken to resolve the issue	Completion date	Remedial action status
RR process documentation has been reviewed to include the improved procedures which includes the change of threshold for rejecting CS reads from 5 to 1 unit. A robust refresher training on replacement read process has been completed on 6/12/2018	6/12/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A weekly QA has been scheduled for the Switch team which includes the assessment of the read replacement process A monthly internal audit has also been planned for the switch team which would include the assessment of the replacement read process. The replacement read process is in the top priority list for automation of Flick processes. The automation of this process should eliminate most of the above issues. A code amendment has also been raised by Flick to align the timeframe between data delivery and RR process which would also help in eliminating some of this issue.	Ongoing	

Title: Gaining trader informs registry of switch request - switch move			
Non-compliance	Description		
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 13-Mar-18 To: 24-May-18	Two switch moves were requested more than two business days after pre conditions were cleared. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are assessed to be strong, NTs are normally requested on time and there are controls in place to detect failed registry updates and re-send the files. The impact is low. Two NT files were affected and they were between two and four business days late.		
Actions taken to resolve the issue	Completion date	Remedial action status	
The two late files were due to system constraints which has now been resolved and there should not be any further occurrence of this issue.	30/11/2018	Identified	

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The process of assessing timeframes of submitting NT files is monitored through the weekly QA process of the Switch team</p> <p>The scheduled monthly internal audit of the Switch team also includes the assessment of this process.</p>	Ongoing	

Title: Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 04-Jan-18</p> <p>To: 19-Jan-18</p>	<p>Four switch moves had incorrect AN response codes applied.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls over AN responses are moderate, also taking into account the non-compliance found for all transfer switch AN files checked. The codes are selected manually and further training has been provided to assist staff to select the correct codes.</p> <p>The impact is assessed as low. Whether AMI metering is present can normally be determined from other registry information.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Refresher training has been provided to switch team on use of AN code.</p> <p>This process has now been automated effective 10/12/2018 which would eliminate most of the errors.</p>		23/11/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A weekly QA has been scheduled for the switch team which involves assessment of the AN code.</p> <p>The assessment of this process has also been included in the monthly internal audit for the switch team.</p> <p>The CS file submission which includes the AN response code is in the testing phase of process automation. The automation of this process will eliminate most of the errors.</p>		Ongoing	

Title: Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 13-Mar-18</p> <p>To: 19-Sep-18</p>	<p>Two late switch move CS files.</p> <p>Some incorrect CS file content.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate now that improved monitoring of switch timeliness has been implemented. CS files are created manually on the registry based on information in Telemetry and there is some room for errors to occur as data is transferred.</p> <p>The impact is assessed as low, most files were sent on time and most CS content was correct. No volume differences were identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Refresher training on the Switch process which included the CS file submission has been completed on 5/12/2018		5/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A weekly QA has been scheduled for the Switch team which include the assessment of the CS file submission process</p> <p>A monthly internal audit has also been planned for the switch team which includes this process</p> <p>The CS file submission process is in the testing phase of process automation. The automation of this process will eliminate most of the errors.</p>		Ongoing	

Title: 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: 01-Dec-17</p> <p>To: 16-Nov-18</p>	<p>Two late RR files.</p> <p>13 ICPs did not have the agreed switch reading recorded in Telemetry.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are assessed to be moderate overall, because most of the time Flick will apply the same reading as the other trader. In certain circumstances it is likely that Flick will not apply the agreed switch reading, including:</p> <ul style="list-style-type: none"> • switch outs where Flick has actual AMI data and the agreed switch read differs from this • switch ins where the difference between the CS read and AMI data is less than ± 5 kWh • switch ins where the difference between the CS read and AMI data is not identified for more than five days after the switch is completed • switch ins where an RR is rejected but processing the correct read will result in a large volume difference for customer billing. <p>The audit risk rating is medium, the issues could have a moderate impact on settlement outcomes, other participants, and consumers if not addressed. Flick intends to review and automate its RR and AC processes, and document improved procedures.</p>	
Actions taken to resolve the issue		Completion date
<p>RR process documentation has been reviewed to include the improved procedures which includes the change of threshold for rejecting CS reads from 5 to 1 unit.</p> <p>A robust read replacement process training has been completed on 6/12/2018</p> <p>Flick has also raised a code amendment for actual read to be defined as midnight read instead of reading from anytime of the day. The current non-clarification of an actual read contributes to the inconsistent CS read being applied by retailers.</p>		6/12/2018
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A weekly QA has been scheduled for the Switch team which includes the assessment of the read replacement process</p> <p>A monthly internal audit has also been planned for the switch team which would include the assessment of the read replacement process.</p> <p>The read replacement process is in the top priority list of automation of Flick processes. The automation of this process should eliminate most of the above issues</p>	Ongoing	

Title: Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 08-Jan-18</p> <p>To: 18-Sep-18</p>	<p>20 switch withdrawal requests were backdated greater than two months from the event date.</p> <p>Two switch withdrawal requests had incorrect advisory codes applied.</p> <p>One switch withdrawal request from another trader was rejected in error.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>The audit risk rating is low, a small number of files were affected and the rejected NW was accepted on reissue.</p>	
Actions taken to resolve the issue		Completion date
The backdated withdrawals were either initiated by customers or other retailers. It was essential to raise these to correct customer accounts. Flick actions requests for withdrawals as soon as incorrect property or incorrect sign ups are identified.		Ongoing
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Retraining has been provided to switch team on the use of the correct withdrawal codes. A weekly QA has been scheduled for the switch team which includes the assessment of the withdrawal process. The assessment of the withdrawal process has also been included in the monthly internal audit	ongoing	

Title: Metering information		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 11-May-18 To: 20-Jun-18	One incorrect CS read and one incorrect RR read were provided. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, as they are sufficient to ensure that the correct read is applied most of the time. The manual processes to both estimate where the switch read is different to the AMI read, and process RR files, can result in data entry errors or missed data. The audit risk rating is low, because most reads provided are correctly applied.	
Actions taken to resolve the issue		Completion date
A refresher training has been completed on 5/12/2018 on both the CS file submission process and the read replacement process.		5/12/2018
Preventative actions taken to ensure no further issues will occur		Completion date
A weekly QA has been scheduled which includes assessment of both the CS file submission process and the read replacement process A monthly audit has also been planned for the switch team which includes the assessment of the both the processes mentioned above The CS file automation is in the testing phase and read replacement process is in the priority list for automation of Flick processes		ongoing

Title: Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 11.14</p> <p>From: 11-Jan-18</p> <p>To: 20-May-18</p>	<p>No unmetered volumes were reported for two ICPs with unmetered load for part of the audit period.</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>Controls are rated as strong, as they prevent shared unmetered ICPs from switching in, and promptly identify added shared unmetered load so that appropriate action can be taken.</p> <p>The impact is very low, and resulted in under reporting by 3.7 kWh.</p>	
Actions taken to resolve the issue		Completion date
Refresher training has been completed on 30/11/2018 on safety net process which identifies data discrepancies including unmetered loads.		30/11/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>A weekly QA has been scheduled for the Field team which includes the assessment of the safety net process.</p> <p>A monthly internal audit has also been planned for the Field team which includes the assessment of the safety net process</p>		Ongoing
Remedial action status		
Identified		

Title: Electricity conveyed & notification by embedded generators	
Non-compliance	Description
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13 and clause 15.2</p> <p>From: 19-Jan-18</p> <p>To: 14-Aug-18</p>	<p>Energy is not metered and quantified according to the code where meters are bridged.</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>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A refresher training has been held with the data team on the estimation bridged meter process		27/11/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Quarterly internal audit has been scheduled for the data team which includes the assessment of the bridge meter process		Ongoing	

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: 07-Aug-18</p> <p>To: 07-Aug-18</p>	<p>Two photo readings were applied as actual readings in CS files, without being appropriately validated.</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. Flick is aware of the requirement to validate photo read, but I found that they had not consistently been validated.</p> <p>The impact is assessed to be low. NHH ICPs rarely switch out, they are normally either upgraded or withdrawn. It is likely that the photo readings were accurate.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The application of the two photo readings as an actual reading in the CS file was a manual data entry error and training has been provided to the Switch team.		5/12/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A weekly QA has been scheduled for the Switch team which includes assessment of the CS contents</p> <p>A monthly internal audit has also been planned for the switch team which would include the assessment of the CS contents</p>	Ongoing	

Title: NHH meter reading application			
Non-compliance		Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 11-May-18 To: 20-Jun-18		One incorrect CS read and one incorrect RR read were provided. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as moderate, as they are sufficient to ensure that the correct read is applied most of the time. The manual processes to create CS and RR files can result in some data entry errors. The audit risk rating is low, because most reads provided are correctly applied.	
Actions taken to resolve the issue		Completion date	Remedial action status
Refresher training has been provided to the Switch team on 5/12/2018		5/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A weekly QA has been scheduled for the Switch team which includes the assessment of the CS contents and replacement read process A monthly internal audit has also been planned for the switch team which would include the assessment of the CS contents and the replacement read process The CS file automation process is in the testing phase and read replacement process is in the priority list for automation of Flick processes. The automation of these processes will eliminate most of the above issues.		Ongoing	

Title: 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: 29-Aug-18</p> <p>To: 14-Oct-18</p>	<p>Two NHH metered ICPs did not have a validated read during the period of supply.</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 assessed to be strong, as Flick endeavours to complete upgrades or withdraw switches for any NHH ICPs. Switches out during the NHH period are relatively rare.</p> <p>The impact is low because two ICPs were affected and the period of supply was less than 36 days in both cases.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A Mandatory requirement has been added in the template for NHH Meter replacement service request to contractors to provide existing readings on NHH meters even for failed upgrades. MEP's have been advised of this additional mandatory requirement.</p> <p>The Field and Data team have been retrained on the NHH meter replacement process.</p>		3/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A weekly QA has been scheduled for the Field team which includes the assessment of the NHH meter replacement process.</p> <p>A monthly internal audit has also been planned for the Field team which includes the assessment of this process.</p>		Ongoing	

Title: Correction of HHR metering information			
Non-compliance	Description		
Audit Ref: 8.2 With: Clause 19(2) Schedule 15.2 From: 01-Aug-18 To: 14-Aug-18	A correction was not processed for the period ICP 0006891497RNC5D's meter was bridged. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate, as most corrections are processed appropriately. Improvement is required to ensure that that corrections for unrecorded consumption during bridged periods is captured. The impact is low, because only one meter was affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Correction has now been processed for the bridged period for ICP 0006891497RNC5D		7/12/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Quarterly internal audit has been scheduled for the data team which includes the assessment of the bridge meter process		Ongoing	

Title: Identification of readings	
Non-compliance	Description
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 07-Aug-18 To: 07-Aug-18	Two photo readings were applied as actual readings in CS files, without being appropriately validated. One actual switch read was provided with a read type of estimated. 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>Controls are rated as moderate. The readings were manually entered into the files with an incorrect read type.</p> <p>The impact is assessed to be low. It is likely that the photo readings were accurate, and a small number of read type errors were identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The application of the two photo readings as an actual reading in the CS file was a manual data entry error and training has been provided to the Switch team.		5/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A weekly QA has been scheduled for the Switch team which includes the assessment of the CS contents</p> <p>A monthly internal audit has also been planned for the switch team which would include the assessment of the CS contents</p>		Ongoing	

Title: Buying and selling notifications			
Non-compliance	Description		
<p>Audit Ref: 11.1</p> <p>With: Clause 15.3</p> <p>From: 06-Jan-18</p> <p>To: 09-Jul-18</p>	<p>No trading notification was provided for HHY profile for BRB0331, MTO0331, MPE1101 or TQB0011.</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	There is no impact. The reconciliation manager's system recorded the profile correctly, and the notification process does not allow the trader to enter the profile.		
Actions taken to resolve the issue		Completion date	Remedial action status
This technical non-compliance has been raised with EA and any action if any will be taken on their recommendation.		7/12/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Participant comments Awaiting response from EA for any suggested actions.		ongoing	

Title: Calculation of ICP days			
Non-compliance	Description		
Audit Ref: 11.2 With: Clause 15.6 From: 01-Apr-18 To: 16-Nov-18	ICP days are not provided for new ICPs until readings are entered after the switch in read. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as they are sufficient to ensure that most data is correctly reported. For a small subset of new switch ins, ICP days will not be provided until actual readings are received. The impact is assessed to be low, as updated data will be provided through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
This issue has been raised with the Tech team and an attempt will be made to resolve this non-compliance through system enhancement .		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The initial incorrect submission of ICP days would be corrected through the revision files.		Ongoing	

Title: Electricity supplied information provision to the reconciliation manager	
Non-compliance	Description
Audit Ref: 12.3 With: Clause 15.7 From: 01-Dec-17 To: 16-Nov-18	The AV120 report does not consistently reflect the quantity billed for the period. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate. Past testing of the AV120 confirmed that it does match invoice data for the samples checked, but there appear to be some issues with the report logic which are causing discrepancies.</p> <p>The impact is assessed to be low, because there is no impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>It was identified that the AV120 discrepancy was due to issues with system reporting.</p> <p>A replacement AV120 report which has been built to report from rating is in the testing phase. A material change audit is scheduled to be completed before the new report is implemented.</p>		1/3/2018 (estimated time)	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The issue with AV120 discrepancy will be resolved once the new report is completed and approved.</p>		1/3/2018 (estimated time)	

Title: HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Dec-17</p> <p>To: 16-Nov-18</p>	<p>HHR aggregates file does not contain electricity supplied information. Estimated submission data is not provided for new ICPs with no readings entered after the switch in read.</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>Controls are rated as strong as they are sufficient to ensure that most data is correctly reported. For a small subset of new switch ins, estimated data will not be provided until actual readings are received.</p> <p>The impact is assessed to be low, as updated data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A process change will be recommended together with system change to incorporate estimates from the switch in date if data is unavailable.</p>		ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
This change in process will ensure that HHR aggregates file include estimated electricity volume information.	ongoing	

Title: Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Dec-17</p> <p>To: 16-Nov-18</p>	<p>Some submission information was incorrect, due to a correction not being processed, some volumes not being based on agreed switch readings, and not providing estimates where actual data was unavailable in some cases.</p> <p>Potential impact: Medium</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 ensure that submission data is accurate most of the time.</p> <p>The audit risk rating is low, because submission information can be corrected washed up through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The incorrect profiles recorded for the 46 ICPs identified through this audit has been corrected. Correction has been processed for the bridged period for ICP 0006891497RNC5D		5/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Refresher training has been completed for the Data and Switch team which included training:</p> <ul style="list-style-type: none"> • Bridge meter process • Safety net – identification of unmetered load and switching out as of event date • Application of Correct profiles in registry • Read replacement process <p>All of the above process has been included to be assessed through the weekly QA and monthly internal audit.</p>		5/12/2018	