

COMPLIANCE PLAN FOR ECOTRICITY

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>Incorrect ANZSIC code for some ICPs. Incorrect information in registry for type of profile assigned to some ICPs</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>The controls are rated as moderate because there are some improvements that can be made to them. The list of tasks is comprehensive, but the outcome is not as successful as expected. The audit risk rating is low because the impact on the settlement outcome is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This is a reflection of the ORION issues that we have experienced which has taken the focus of key staff away from fulfilling this task.</p> <p>Ecotricity however do how take responsibility for not fulfilling and checking this function.</p>		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Meter upgrade staff have been briefed on corrective action.</p> <p>An extra staff member has been appointed and starts on 5/4/2018.</p>		20/3/2018	

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35 From: 01-Dec-17 To: 28-Feb-18	AV-120 file was sent late once. Meter Reading Frequency report not sent regularly Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made to them particularly in relation to sending regular Meter Readings Frequency Report (MRF). It was noted that the task of sending MFR was not on the list of monthly tasks provided by Ecotricity. The audit risk rating is low because the impact on the settlement outcome is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
A monthly task has been added for MRF in our Daily Processes check.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>Late trader's updates to registry (38.8% of all entries), delayed updates to ICPs "active" status</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: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as weak. 38.8 % of traders' updates are backdated more than 5 BD and 48.7% updating the status to "active". Ecotricity is a small trader. Status changes can have a minor impact on settlement outcomes if submission volumes are based on the registry information and later on are corrected using the revision process. ORION calculates submission volumes regardless of site status in registry, submissions are based on raw data. Incorrect information of the ICPs status can affect switching and customer invoicing. Audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This is a staff resourcing issue as opposed to a process issue. Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 9 of Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>Some ICPs of new connections were updated to “active” late</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>The controls are recorded as moderate. The information for new connections is correct but updates to the “active” status is often late. Audit risk rating is recorded as low because there was impact on settlement outcomes as submission volumes are based on raw data in ORION.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have the controls necessary to avoid this breach. We have however been under resourced in this area from a number of staffing perspective.		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 01-Jul-17 To: 28-Feb-18	34 ICPs have incorrect ANZSIC codes assigned Potential impact: Low Actual impact: Low Audit history: once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because the checks are in place. The level of non-compliance has not improved since last year. Incorrect ANZSIC codes identified in the last audit were not corrected.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have the controls necessary to avoid this breach. Metering staff in particular have been re-briefed on resolving this issue. We have also been under resourced in this area from a number of staffing perspective.		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Description	Recommendation	Audited party comment	Remedial action
Incorrect ANZIC code for permanent supplies	Review ANZSIC code after a switch is finalised and after a new connection changes from BTS to permanent	Metering staff in particular have been re-briefed on resolving this issue.	Identified

Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: 17 of Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>A number of ICPs have incorrectly assigned “inactive” status when they should be “active”</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once before</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. The process for disconnection/connection from the point of view of communication with MEPs and WELLS works well. The weak point is not updating the registry correctly as per section 3.3. No impact on settlement outcomes. Audit risk rating is low. Small number of ICPs affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have the controls necessary to avoid this breach.</p> <p>We have been under resourced in this area from a number of staffing perspective.</p>		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: 19 of Schedule 11.1</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>A number of ICPs had incorrect “inactive” status assigned in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once before</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. The process for disconnection/connection from the point of view of communication with MEPs and WELLS works well. The weak point is not updating the registry correctly as per section 3.3. The LIS file had the status as “inactive” for 22 ICPs. No impact on settlement outcomes. Audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have the controls necessary to avoid this breach.</p> <p>We have been under resourced in this area from a number of staffing perspective.</p>		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 01-Jul-17 To: 28-Feb-18	One CS file late and incorrect type of reading flag in one CS file randomly chosen to assess compliance. Potential impact: Low Actual impact: Low Audit history: Once before Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong. Only one CS file was late in the period covered by this audit. The impact on settlement outcomes is minor		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching process have been vastly improved and will continue to be a strong point of our business.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching staff have been involved in the Audit and will continue to improve where possible.		20/3/2018	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 6(1) of Schedule 11.3</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>Three RR files were sent later than 4 calendar months. RR file not sent for one ICP</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 recorded as moderate. It is a manual well managed process, to which additional improvements should give more confidence in accuracy and speed up the process. Minor impact on settlement outcomes because of the small number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The Switching process has been resourced up and has been vastly improved and will continue to be a strong point of our business.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching staff have been involved in the Audit and will continue to improve where possible.		20/3/2018	

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 01-Jul-17 To: 28-Feb-18	CS file for one ICP was sent later than 5BD (9 days) Potential impact: Low Actual impact: Low Audit history: Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. Well managed process. Audit risk rating recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
The Switching process has been resourced up and has been vastly improved and will continue to be a strong point of our business.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching staff have been involved in the Audit and will continue to improve where possible.		20/3/2018	

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: 12 of Schedule 11.3</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>Ecotricity did not use the same read as the gaining trader for two ICPs</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	<p>Controls are recorded as strong. It is a manual well managed process, to which additional improvements should give more confidence in accuracy and speed up the process. No impact on settlement outcomes because of the small number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The Switching process has been resourced up and has been vastly improved and will continue to be a strong point of our business.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching staff have been involved in the Audit and will continue to improve where possible.		20/3/2018	

Non-compliance	Description		
Audit Ref: 4.14 With: 16 of Schedule 11.3 From: 01-Nov-17 To: 30-Nov-17	ICP 1001282351LCDF7 switch was complete later than 3 business days Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. The process is manual. Every day the Switch Breach Report is checked. There is only a small number of this type of switch. No impact on settlement outcomes because it was within the same reconciliation period		
Actions taken to resolve the issue		Completion date	Remedial action status
The Switching process has been resourced up and has been vastly improved since our last audit.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Switching staff have been involved in the Audit and will continue to improve where possible.		20/3/2018	

Non-compliance	Description		
Audit Ref: 5.1 With: 11.14(6)(7) From: 01-Nov-17 To: 28-Feb-18	Daily Unmetered kWh are not recorded for shared unmetered load for one ICP Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There are no controls to identify shared unmetered load as a part of a newly gained ICP. In this case, it is only 19W over 12 hours. No impact on settlement outcomes. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was functionally we understood was working in Orion (Agility) however during the audit it was discovered it was not.		tba	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Agility has been briefed on the functionality not working.		tba	

Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: 7(1)(2) of Schedule 15.2</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>The requirements to use best endeavours to obtain a read for all ICPs not read during the period of supply was not met</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because there is no structured process in place to assure compliance is met. Impact on settlement outcomes is minor because ORION estimates data at the end of each month.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>It is noted this is an area for improvement. This functionality is not currently available in Orion. Agility have been briefed on this shortcoming.</p> <p>Metering staff have been briefed and processes have been put in place in the meantime.</p>		4/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Metering staff have been briefed and processes have been put in place in the meantime.</p>		tba	

Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: 8(1)(a)(2) of Schedule 15.2</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>The requirements to use best endeavours to obtain a read for all ICPs annually was not met. The last time a Reading Frequency Report was submitted for Nov'17</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once before</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because there is no structured process in place to assure compliance is met. Impact on settlement outcomes is minor because ORION estimates data at the end of each month.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The frequency read report in Agility is deficient and therefore ICPS requiring reads were missed.		4/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Agility have been briefed on the deficient report.		tba	

Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: 9(1)(3) of Schedule 15.2</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>The requirements to use best endeavours to obtain a read for all ICPs annually was not met. The last time a Reading Frequency Report was submitted for Nov'17</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once before</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak because there is no structured process in place to assure compliance is met. Impact on settlement outcomes is minor because ORION estimates data at the end of each month.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The frequency read report in Agility is deficient and therefore ICPS requiring reads were missed.		4/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Agility have been briefed on the deficient report.		tba	

Non-compliance	Description		
Au dit Ref: 11.3 With: 15.7 From: 06-Feb-18 To: 13-Apr-18	AV-120 file for the month of January'18 was not submitted by 1600 hour on day 4. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. It is the first time that Ecotricity not submitted AV-120 file.		
Actions taken to resolve the issue		Completion date	Remedial action status
We self-breached as noted, again because human resource was being swamped because of having to deal with billing Agility issues. Reconciliation Dashboard Reports will be developed for monthly internal reviews. However, we would also like to note our own disappointment in the difference in as billed volumes compared to submitted volumes. This was primarily due to an issue with Agility not reporting (minor) volumes on some new GXP's, hence default volumes were charged on these GXP's which will be washed out in May 2018.		4/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Extra staff have been appointed specifically to reporting to assist current staff.		4/4/2018	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Jul-17 To: 28-Feb-18	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Ecotricity submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted, we have the controls necessary to avoid this error.		20/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		20/3/2018	

Non-compliance	Description		
Audit Ref: 12.3 With: 15.5 From: 01-Jul-17 To: 28-Feb-18	Allocation of volumes information for some ICPs to another NSP than indicated by the data held in the registry for the relevant consumption 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	Controls are recorded as moderate because there are some improvements that can be made to them. Synchronising data between ORION and the registry is still not satisfactory.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have the controls necessary to avoid this breach. We have been under resourced in this area from a number of staffing perspective.		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
Audit Ref: 12.8 With: 4 of Schedule 15.2 From: 01-Jul-17 To: 28-Feb-18	Permanence of meter reading for the period May'16 to Dec'16 not achieved. 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 recorded as moderate because there are some improvements that can be made to them. Ecotricity trades a small number of NHH ICPs for which metering is changed to HHR as soon as possible. The audit risk rating is low because the impact on the settlement outcome is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have the controls necessary to avoid this breach. We have been under resourced in this area from a number of staffing perspective.		5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.		5/4/2018	

Non-compliance	Description		
Audit Ref: 12.9 With: 2(c) of Schedule 15.3 From: 01-Jul-17 To: 28-Feb-18	Shared unmetered and unmetered load ICPs not reconciled. Reconciliation volumes for 20 ICPs are submitted as HHR. Volumes are profiled using NHH reads Potential impact: Low Actual impact: Low Audit history: once before Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low			
Actions taken to resolve the issue		Completion date	Remedial action status

We have the controls necessary to avoid this breach. We have been under resourced in this area from a number of staffing perspective.	5/4/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional staff have been appointed to fulfil these tasks in a timely manner.	5/4/2018	

Non-compliance	Description		
Audit Ref: 12.10 With: 4 of §schedule 15.3 From: 01-Jul-17 To: 28-Feb-18	Incorrect calculation of historical estimates conducted by ORION Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as weak. ORION calculations are not correct by applying GR-030		
Actions taken to resolve the issue		Completion date	Remedial action status
This has been an ongoing issue which we understood to have been resolved after one previous audit. Other Orion retailers appear to have this issue resolved which Agility have set up a special working group to check and then deploy with Ecotricity. Ecotricity also is better equipped to test the NHH historic estimate functionality.		tba	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Agility have set up a special working group to check and then deploy with Ecotricity.		tba	

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Jul-17</p> <p>To: 28-Feb-18</p>	<p>Historically HE targets not met for revision 3, 7, and 14.</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			
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This has been an ongoing issue which we understood to have been resolved after one previous audit.</p> <p>Other Orion retailers appear to have this issue resolved which Agility have set up a special working group to check and then deploy with Ecotricity.</p> <p>Ecotricity also is better equipped to test the NHH historic estimate functionality.</p>		tba	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Agility have set up a special working group to check and then deploy with Ecotricity.		tba	