

Compliance plan for Body Corporate Power

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35 From: 01-Feb-17 To: 30-Apr-18	Submissions files late in July'18 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. Submission of RM file is contracted out to JC Consulting. It was a dispute over non-payment which caused volume information to not be submitted on time. There was no impact on settlement outcomes therefore audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Negotiation with JC Consulting on terms and deliverables		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Agreed compliant terms with JC Consulting		Completed	

Non-compliance	Description		
Audit Ref: 2.2 With: 11.2 From: 04-Apr-18 To: 18-May-18	Incorrect date of assigned status for 38 ICPs located in Clifton Court Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. There was minor impact on settlement because all ICPs in Clifton Court were vacant. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Better understanding of recording event dates, issue with Registry on adjusting date range. Communication with RM		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Date Range adjustments require first a change is status and can then be updated with correct dates. ICP Status process updated. Incorrect dates updated in registry.		18 May 2018	

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 04-Jul-17 To: 30-Apr-18	Backdated trader and status events in the registry 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. There is not a full understanding of the significance of an event date in the registry. There was a minor impact on settlement outcomes because of the small number of ICPs		
Actions taken to resolve the issue		Completion date	Remedial action status
Better understanding of Event date requirements, Review of Registry Training and process updated		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Educated on Event Status and Event Date requirements.		18 May 2018	

Non-compliance	Description		
Audit Ref: 3.9 With: 19 of Schedule 11.1 From: 01-Feb-17 To: 30-Apr-18	Incorrect status was assigned for 38 ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as weak. There is not a full understanding of the significance of an event date in the registry. There was a minor effect on settlement outcomes because of the small number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Understanding of change in event dates to last event		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Educated on change in Registry to most recent event date and Registry update requirements. Updated process documentation. Review of Registry Training		18 May 2018	

Non-compliance	Description		
Audit Ref: 4.2 With: 3 of Schedule 11.1 From: 31-Oct-17 To: 27-Jan-18	3 out of 8 AN files were sent late to the registry Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak because there are some improvements that can be made to them. The management of the timing of registry updates is not the best. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Daily Task File Updated to Include Switch Breach Monitoring on a Daily Basis.		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Daily Monitoring now in place		18 May 2018	

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.1 From: 31-Oct-17 To: 27-Jan-18	2 out of 8 CS files were sent late to the registry Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak because there are some improvements that can be made to them. The management of the timing of registry updates is not the best. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Daily Monitoring of Switch Breach in Registry. Updated Daily Task Process.		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitor Switch Requests Daily. Update and Process within 5 Business days.		18 May 2018	

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 31-Oct-17 To: 27-Jan-18	1 out of 2 CS files were sent late to the registry Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak because there are some improvements that can be made to them. The management of the timing of registry updates is not the best. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Daily Monitoring of Switch Breach in Registry. Updated Daily Task Process.		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitor Switch Requests Daily. Update and Process within 5 Business days.		18 May 2018	

Non-compliance	Description		
Audit Ref: 4.10 With: 11 of Schedule 11.3 From: 19-Mar-18 To: 19-Apr-18	Incorrect content of CS file for 0000142054UNB5D Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak because there are some improvements that can be made to them. The management of the timing of registry updates is not the best. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Updated Process Documentation to include Final Read as Actual Read Date.		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
(See Note 1) Monitor NHH Final Reads. Read Process Updated.		18 May 2018	

Non-compliance	Description		
Audit Ref: 6.6 With:3(2) of Schedule 15. From: 04-Oct-17 To: 18-Apr-18	Validation of meter readings for 0000142054UNB5D was done using customer reads Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. Management of non AMI reads has to be improved. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
(see Note 1) Metering Reading Process updated to include actual (validated) readings to support customer supplied reads and photos.		18 May 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NHH Manual Process Updated for Exception Reads.		18 May 2018	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Feb-17 To: 30-Apr-18	HHRAGGR files do not contain electricity supplied information Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Body Property Power submits submissions volumes as per the reconciliation manager specification		
Actions taken to resolve the issue		Completion date	Remedial action status
Recommend Code Amendment to Address misalignment between the Code requirements and RM file specification		On-going	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Work with Electricity Authority and Market Participants on Code Change		On-going	

Non-compliance	Description		
Audit Ref: 12.2 With: From: 06-Jul-17 To: 06-Jun-17	Submission files were late in July'17. BCPL lodged a self-breach Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. There was no impact on settlement because files were late only a few hours. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Negotiate commercial Terms with JC Consulting		July 17 2017	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New Terms agreed to ensure compliance.		December 2017	

Non-compliance	Description		
Audit Ref: 13.3 With: 10 of Schedule 15.3 From: 01-Jan-18 To: 31-Jan-18	Target of 80% was not met for HEN0331. There was only one ICP traded on this NSP Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. Management of non AMI reads has to be improved. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
((see Note 1) Metering Reading Process updated to include actual (validated) readings to support customer supplied reads and photos.		18 Mau 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NHH Exception Read Process Updated		18 May 2018	