

Compliance plan for Hunet 2018

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: 11.2 & 15.2</p> <p>From: 04-Dec-17</p> <p>To: 31-Mar-18</p>	<p>Information is not complete or accurate for the ICPs with distributed generation.</p> <p>Submission file contains incorrect information.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate as controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk is rated as high because submission information is inaccurate (over submission) for at least January 2018 by 70,000 kWh and is likely to be inaccurate for other months.</p>	
Actions taken to resolve the issue		Completion date
Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with section 6.1. Distributed generation volumes was tested and have been confirmed that the new submission system accurately reports the volumes. The incorrect information submitted over the past 14month period will be addressed during the new revision process.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We have made excellent progress with our new submission system and the compliance that we follow, and we are pleased that our HE and FE consumption have been correctly implemented. The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.</p> <p>We will also establish a SFTP connection to our hosting account to ensure that data is securely transmitted via our AMI reading management process, which will be same as our working Metrix and NGCM process.</p>		31/05/2018
		Identified

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 18-Oct-17</p> <p>To: 22-Dec-17</p>	<p>Not recorded as responsible for one ICP on the registry at the time of electrical connection.</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 rated as moderate as controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk is low as only one ICP was affected.</p>	
Actions taken to resolve the issue		Completion date
<p>This is an exceptional case and it wasn't our intention to breach the code. On 08/06/2016 metering at a new point of connection to the Vector network was electrically connected. Due to a misunderstanding the metering was associated with ICP# 0766592896LC50D even though it was separate customer and separate point of connection to the Vector network and should never have been with Hunet / associated with this ICP identifier.</p> <p>Metrix identified this and worked with us to get an ICP identifier created from the date the ICP was created (08/06/2016)</p> <p>Vector have created the ICP identifier of 1002040580LCE15 for this point of connection to the network, however have set a creation date of 18/10/2017 (the date the point of connection was confirmed to be a separate connection to the Vector network).</p> <p>As a result we do not have an ICP number to reconcile the volumes consumed at this point of connection between 08/06/2016 – 18/10/2017.</p> <p>EA requested Vector to give ICP#1002040580LCE15 the correct 'ready' date of 08/06/2016 to enable us to claim the ICP from this date and reconcile the metered volumes they have for this point of connection.</p>		30/06/2018
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Metrix advised us that they are implementing processes to prevent this occurring going forward. Vector will also be able to move the ICP creation date to an earlier date by DM-010 process.	ongoing	
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Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 Schedule 11.1</p> <p>From: 15-Aug-16</p> <p>To: 31-Mar-18</p>	<p>Registry information not updated within 5 business days of the event for 27 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate as controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low due to the small number of ICPs backdated greater than five days.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Hunet has deployed a robotic tool called the “Disco Reco Manager” which automatically updates the ICPs status once the service request is returned. This went live on 07/02/2018. The operator raises a work request via the excel form provided by MEPs to reconnect or disconnect an ICP. This lodges a task in the “Disco Reco” management file. Once the job is complete and its paperwork is received, the robot completes the task updating both Hunet’s system and the registry overnight. It usually takes 1 day for remote job and 3-5 days for manual job. Total 244 disco and reco jobs have been raised with our new process since 07/02/2018 and there has been no delay in update reported.</p>		07/02/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The operations manager also checks that all jobs have been processed and consumption has stopped as expected. We also review consumption increase for old inactive ICPs on a monthly basis from ICP management tool to keep track of the status changes.</p> <p>We consider that the controls in place are strong and are adequate to ensure that the compliance is met.</p>		ongoing	

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: 9 Schedule 11.1</p> <p>From: 18-Oct-17</p> <p>To: 22-Dec-17</p>	<p>1 ICP not updated within five business days of electrical connection.</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 rated as moderate as controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk is low as only one ICP was affected.</p>	
Actions taken to resolve the issue		Completion date
<p>This is an exceptional case and it wasn't our intention to breach the code. On 08/06/2016 metering at a new point of connection to the Vector network was electrically connected. Due to a misunderstanding the metering was associated with ICP# 0766592896LC50D even though it was separate customer and separate point of connection to the Vector network and should never have been with Hunet / associated with this ICP identifier.</p> <p>Metrix identified this and worked with us to get an ICP identifier created from the date the ICP was created (08/06/2016)</p> <p>Vector have created the ICP identifier of 1002040580LCE15 for this point of connection to the network, however have set a creation date of 18/10/2017 (the date the point of connection was confirmed to be a separate connection to the Vector network).</p> <p>As a result we do not have an ICP number to reconcile the volumes consumed at this point of connection between 08/06/2016 – 18/10/2017.</p> <p>EA requested Vector to give ICP#1002040580LCE15 the correct 'ready' date of 08/06/2016 to enable us to claim the ICP from this date and reconcile the metered volumes they have for this point of connection.</p>		30/06/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Metrix advised us that they are implementing processes to prevent this occurring going forward. Vector will also be able to move the ICP creation date to an earlier date by DM-010 process.		Ongoing

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 9 (1(k) of Schedule 11.1</p> <p>From: 01-Oct-17</p> <p>To: 31-Mar-18</p>	<p>12 incorrect ANZSIC codes assigned.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls for the audit period are rated as moderate and I note that the commercial sign up process going forward has strong controls.</p> <p>The audit risk rating is low as this has no direct impact on submission accuracy.</p>	
Actions taken to resolve the issue		Completion date
Hunet has already deployed a new ANZSIC code validation tool for all the new gaining ICPs since March 2018. Our new tool determines the correct ANZSIC code for a business from its business classification registered in Equifax as part of a customer registration process. Equifax gathers business data from 'Companies office', and registers and updates business information. The information on Equifax is very reliable.		01/03/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Hunet has already deployed a new ANZSIC code validation tool for all the new gaining ICPs since March 2018. We will examine all the existing business ICPs for their ANZSIC codes assigned to ensure their validity.</p> <p>Hunet will also continue to focus on optimizing our standard by identifying and monitoring our own performance and ways for improvement, and to ensure business classification is matching with the business name.</p>		30/06/2018
		Identified

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: 3 and 4 Schedule 11.3</p> <p>From: 27-Sep-16</p> <p>To: 18-Oct-17</p>	<p>Two late AN files sent.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 the automated process will eliminate risk to an acceptable level.</p> <p>The audit risk rating is low as this has no direct impact on submission accuracy.</p>	
Actions taken to resolve the issue		Completion date
<p>Hunet have deployed the switching module which was assessed during the last audit. This went live on 16/10/17. The AN code is now determined according to a hierarchy and these are updated to the registry via Hunet's switching module. The sample checked confirmed that the compliance was met, and no delayed or invalid AN code found since the new progress went live.</p>		16/10/2017
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We consider that the controls in place are strong and are adequate to ensure that the compliance is met.</p> <p>Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways for improvement.</p>		ongoing
		Cleared

Losing trader must provide final information - standard switch			
Non-compliance	Description		
Audit Ref: 4.3 With: 5 Schedule 11.3 From: 01-Oct-17 To: 31-Mar-18	CS file content incorrect for 4 out of 6 examples checked. Three late CS files. 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 is low as the errors only affects ICPs with two meters or registers and I note that this is expected to be corrected as part of the material change.		
Actions taken to resolve the issue		Completion date	Remedial action status
Hunet deployed a new switching breach report and it reports list of ICPs twice a day when any switch due within the same day or next day arrives. We also enhanced our date validation tool in the switching module on 22.01.2018 and our system no longer allows end users to send late CS files for NTTRs. The three late CS files found in the audit were the cases that occurred prior to when the new breach report process was put in place.		22/01/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We consider that the controls in place are strong and are adequate to ensure that the compliance is met. Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways for improvement.		Ongoing	

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: 10(1) Schedule 11.3 From: 01-Oct-17 To: 31-Mar-18	Six late CS files. 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 controls will mitigate risk most of the time but there is room for errors to occur. Thu audit risk rating is assessed to be low due to the small number of CS files.	
Actions taken to resolve the issue		Completion date
Hunet deployed a new switching breach report and it reports list of ICPs twice a day when any switch due within the same day or next day arrives. We also enhanced our date validation tool in the switching module on 22.01.2018 and our system no longer allows end users to send late CS files for NTTRs. However, we discovered that we missed the date validation tool for NIMIs in this audit.		22/01/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We can add an additional feature onto our existing date validation tool on the switching module to prevent end users from sending CS files for NTMIs late, when our CS event date is already passed for more than 5 days from the date NTMI is received from the losing trader.		31/05/2018
		Identified

Losing trader determines a different date - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: 10(2) Schedule 11.3</p> <p>From: 08-Oct-17</p> <p>To: 09-Oct-17</p>	<p>One event date set earlier than the gaining traders requested date.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as the switching module contains validation that mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as this affected one ICP.</p>	
Actions taken to resolve the issue		Completion date
Hunet has deployed the switching module which was assessed during the last audit, and this will not allow for a move switch event date to be set earlier than the gaining trader's event date, which is no greater than ten business days in advance. This went live on 16/10/17. Review of the event detail report discovered that ICP 0676799523LC05B had a proposed switch event date that was earlier than the gaining trader's request date.		16/10/2017
Preventative actions taken to ensure no further issues will occur		Completion date
We consider that the controls in place are strong and are adequate to ensure that it meets the compliance. Hunet will also continue to focus on optimizing our standard by identifying and monitoring our own performance and ways for improvement.		ongoing
		Cleared

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: 11 Schedule 11.3 From: 01-Oct-17 To: 31-Mar-18	CS file content incorrect. 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 currently rated as moderate but this is expected to move to strong with the new submission system addressing the incorrect average daily consumption for ICPs with multiple meters or registers. The audit risk is low as the errors detected will have a minimal effect on reconciliation.	
Actions taken to resolve the issue		Completion date
The last read date validation has been added to the switching console from 22/01/2018 and the correct read dates have been used since the new progress went live. Average daily consumption has also been corrected in the new submission system to calculate accurate average daily consumption for more than one meter or register, and was proven its validity in the material change audit. Average daily consumption is working correctly for ICPs and will be used in CS file as soon as our new submission system go live.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Hunet considers that the controls in place are strong and are adequate to ensure that the compliance is met. We will also continue to focus on optimizing our standard by identifying and monitoring our own performance and ways for improvement.		ongoing
		Identified

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
Audit Ref: 4.11 With: 12 Schedule 11 From: 19-Oct-17 To: 05-Mar-18	One RR file sent not derived from two actual reads. One late AC file. 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 controls will mitigate risk most of the time but there is room for errors to occur. The audit risk rating is low as this relates to two ICPs only.		
Actions taken to resolve the issue		Completion date	Remedial action status
The one late AC file was due to human error. This was prior to the switching console being deployed and there have been no late AC files since this has been in place.		14/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Hunet will not accept customer readings for RR.		21/05/2018	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: 10.13, Clause 10.24 and 15.13</p> <p>From: 04-Dec-17</p> <p>To: 31-Mar-18</p>	<p>Generation volumes incorrectly treated as load for the 4 ICPs with distributed generation.</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>Present controls are rated as weak as the generation volumes are being treated as load.</p> <p>The audit risk rating is low as only four ICPs are affected.</p>	
Actions taken to resolve the issue		Completion date
<p>Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 10.13, Clause 10.24 and Clause 15.13</i>.</p> <p>Distributed generation volumes was tested and have been confirmed that the new submission system accurately reports the volumes. The incorrect information submitted over the past 14month period will be addressed during the new revision process.</p>		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.</p>		18/07/2018
		Identified

Derivation of meter readings		
Non-compliance	Description	
Audit Ref: 6.6 With: Clause 5 of Schedule 15.2 From: 01-Oct-17 To: 31-Mar-18	Datacol does not identify and report phase failure to Hunet. 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 reduce the risk most of the time, but Datacol do not report phase failure to Hunet. The audit risk rating as is low as 2.9% of Hunet's ICPs are manually read and this is continuing to decrease.	
Actions taken to resolve the issue		Completion date
We have identified the requirements and will contact Datacol to discuss further about this matter.		31/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We will work with Datacol to resolve this issue.		31/07/2018

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: 7(1) and (2)</p> <p>Schedule 15.2</p> <p>From: 07-Apr-17</p> <p>To: 05-Oct-17</p>	<p>One ICP not read during period of supply.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 the AMI meter replacement process is successful in most instances but I recommend a process be developed for those rare instances where AMI is refused or unable to be installed.</p> <p>The audit risk rating is low as only one ICP was not read therefore the impact on reconciliation is low.</p>	
Actions taken to resolve the issue		Completion date
Hunet has offered smart meter installation for customers in various ways. We have 150 ICPs that had AMI meters replaced in the last 9 months		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
It is sometimes very difficult to get hold of customer on site for the meter replacement. Hunet will build a new process for those customers that we predict to have high estimate consumption and push for a meter replacement.		31/05/2018
		Identified

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: 8(1) and (2) Schedule 15.2 From: 01-Oct-17 To: 31-Mar-18	Incorrect monthly meter reading report being provided to the Electricity Authority. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The continuing inaccurate information being reported indicates controls are weak. Overall the volume of unread ICPs reported is small or none and the report is over reporting the number of ICPs.	
Actions taken to resolve the issue		Completion date
Hunet has completed the data cleaning exercise to investigate all the long term unread sites. The MEP has been sent to each site to determine the correct status and Hunet have then updated their system.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As Hunet has completed the data cleaning exercise, our next project is to correct our meter reading report to not include ICPs that have been decommissioned or disconnected.		31/05/2018
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: 9(1) and (2) Schedule 15.2 From: 01-Apr-17 To: 30-Sep-17	Incorrect monthly meter reading report being provided to the Electricity Authority. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The continuing inaccurate information being reported indicates controls are weak. Overall the volume of unread ICPs reported is small or none and the report is over reporting the number of ICPs.	
Actions taken to resolve the issue		Completion date
Hunet has completed the data cleaning exercise to investigate all the long term unread sites. The MEP has been sent to each site to determine the correct status and Hunet have then updated their system.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As Hunet has completed the data cleaning exercise, our next project is to correct our meter reading report to not include ICPs that have been decommissioned or disconnected.		31/05/2018
		Identified

Correction of NHH meter readings		
Non-compliance	Description	
<p>Audit Ref: 8.1</p> <p>With: 19(1) Schedule 15.2</p> <p>From: 01-Oct-17</p> <p>To: 31-May-18</p>	<p>Corrections have not been submitted during the audit period.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 corrections are being calculated but due to the submission file being incorrect have not been submitted.</p> <p>The impact on reconciliation is low as the number of ICPs traded by Hunet is small.</p>	
Actions taken to resolve the issue		Completion date
<p>Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 19(1) Schedule 15.2</i>.</p> <p>Dummy volumes for stopped meters and generation volumes were tested and have been confirmed that the new submission system accurately reports the volumes. The incorrect information submitted over the past 14month period will be addressed during the new revision process.</p>		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We have made excellent progress with our new submission system and the compliance that we follow, and we are pleased that our HE and FE consumption have been correctly implemented. The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.</p>		18/07/2018
		Identified

Meter data used to derive volume information		
Non-compliance	Description	
Audit Ref: 9.3 With: 3(5) Schedule 15.2 From: 01-Oct-17 To: 10-May-18	Meter reading data rounded for Metrix reads and truncated for AMS reads. 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 weak as Hunet were unaware of this requirement, but I note this was corrected immediately upon discovery. The audit risk rating is low as the volume of ICPs traded by Hunet is small in relation to the market.	
Actions taken to resolve the issue		Completion date
Hunet has updated submission information during the site audit for NHH Meter readings provided by Datacol and the MEPs providing data are not rounded or truncated		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We have confirmed that NHH Meter readings provided by Datacol and the MEPs providing data are not rounded or truncated in the new submission files.		11/05/2018
		Identified

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: 15.6 From: 01-Aug-17 To: 31-Mar-18	ICP days report double counting ICPs with multiple meters or registers. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak as the ICP day error wasn't identified. Audit risk rating is low as the volume of ICPs affected will not have material impact on settlement.	
Actions taken to resolve the issue		Completion date
Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 15.6</i> . ICP days was tested and have been confirmed that the new submission system accurately reports the volumes. The incorrect information submitted over the past 14month period will be addressed during the new revision process.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We have made excellent progress with our new submission system and the compliance that we follow, and we are pleased that ICP days have been correctly implemented. The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.		18/07/2018
		Identified

Accuracy of submission information			
Non-compliance	Description		
Audit Ref: 12.7 With: 15.12 From: 01-Aug-17 To: 31-Mar-18	Corrections not processed since the last audit. NHH submission files inaccurate. Potential impact: Low Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	Controls for the current system are rated as weak as the calculations are incorrect. The audit risk rating is high due to the over submission for Jan 18 of over 70,000 kWh		
Actions taken to resolve the issue		Completion date	Remedial action status
Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 15.12</i> . The incorrect information submitted over the past 14month period will be addressed during the new revision process.		11/05/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have made excellent progress with our new submission system and the compliance that we follow, and we are pleased that our HE and FE consumption have been correctly implemented. The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.		18/07/2018	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: 4 Schedule 15.2 From: 01-Oct-17 To: 31-Mar-18	Some FE still exists at 14 months. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak as the logic behind the current submission tool is not understood and therefore it is unclear as to how reads are being managed in relation to submission. I note that the revised file is expected to be correct. The volume overall of HE is low at revision 14 therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 4 Schedule 15.2</i> . The incorrect information submitted over the past 14month period will be addressed during the new revision process.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We have made excellent progress with our new submission system and the compliance that we follow, and we are pleased that our HE and FE consumption have been correctly implemented. The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.		18/07/2018
		Identified

Historical estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.11</p> <p>With: 4 and 5 Schedule 15.3</p> <p>From: 01-Oct-17</p> <p>To: 31-May-18</p>	<p>HE scenarios not working correctly in the current submission system.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls for the current system are rated as weak as the calculations are incorrect.</p> <p>The audit risk rating is high due to the over submission for Jan 18 of over 70,000 kWh</p>	
Actions taken to resolve the issue		Completion date
<p>Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 4 and 5 Schedule 15.3</i>. The incorrect information submitted over the past 14month period will be addressed during the new revision process.</p>		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We have made excellent progress with our new submission system and the compliance that we follow, and we are pleased that our HE and FE consumption have been correctly implemented. The submission files will also be monitored for the next two months through the peer review by John Candy to ensure that the new submission system works as per expectation in production.</p>		18/07/2018
		Identified

Reporting resolution		
Non-compliance	Description	
Audit Ref: 13.2 With: 9 Schedule 15.3 From: 01-Oct-17 To: 31-May-18	Submission is rounded to whole numbers. 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 weak as Hunet were unaware of this requirement, but this was corrected immediately upon discovery. The audit risk rating is low as the volume of ICPs traded by Hunet is small in relation to the market.	
Actions taken to resolve the issue		Completion date
Hunet has updated submission information during the site audit to round up values to not more than two decimal places.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We have confirmed that updated submission information is being correctly rounded to whole numbers.		22/05/2018
		Cleared

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: 10 Schedule 15.3 From: 01-Oct-17 To: 31-Mar-18	Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Processes in place will mitigate risk most of the time hence controls are rated as moderate. The audit risk rating is low as the volume of FE overall is low.	
Actions taken to resolve the issue		Completion date
Hunet worked closely with John Candy to accurately obtain data, calculation formula and the output from the two in each scenario, and it has already proven that they are compliant with <i>Clause 10 Schedule 15.3</i> . The incorrect information submitted over the past 14month period will be addressed during the new revision process and the percentage HE at a summary level from the new submission files will be met with the required target.		11/05/2018
Preventative actions taken to ensure no further issues will occur		Completion date
We consider that the controls in place are strong and are adequate to ensure that the compliance is met. Hunet will also continue to focus on optimizing our standard by identifying and monitoring our own performance and ways for improvement.		ongoing
		Identified