

## Compliance plan for Globug– 2018

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: 10.6,11.2 & 15.2 From: 01-Jul-17 To: 30-Jun-18	Some registry discrepancies. Potential impact: Medium Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the existing discrepancy reporting is not identifying status misalignments. The audit risk is rated as low as the ICPs not updated for disconnection (incorrect status updates and credit disconnections) this will affect ICP day accuracy and other participants if an ICP switches away at the incorrect status.	
Actions taken to resolve the issue		Completion date
Both ICPs with cat 9 metering have been corrected as of 31.07.2018 All 103 ICPs have been reviewed and all misalignments have been corrected as of 23.08.2018		23.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
Globug will be added to monthly reporting to capture cat 9 discrepancies. For status misalignments for status1,4 and 1,9 sites we have created a manual process to check for and reconcile any misalignments while we work to improve automated reporting		20.08.2018
		Identified

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: 10.33A From: 07-Jun-18 To: 30-Jul-18	Two ICPs reconnected with uncertified metering. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as Globug's process to install AMI meters for their service will ensure certified metering is in place. The audit risk rating is low as this affected two ICPs and once the meters are replaced these will be compliant with this clause.	
Actions taken to resolve the issue		Completion date
MEEN is looking to implement the Auditors recommendation and investigate changing processes or refusing customers transfers. As noted by the auditor, it is MEP non-compliance that is triggering Retailer non-compliance.		October 2018
Preventative actions taken to ensure no further issues will occur		Completion date
EA should consider this as an industry wide issue where compliance by a retailer is potentially unachievable.		2020

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: 10 Schedule 11.1  From: 22-Jan-18 To: 30-Jun-18	Registry not updated within 5 business days of the event for some reconnections, disconnections and one MEP change.  Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as the process in place to update the registry is generally functioning well with the exception of the two issues identified above which are causing some updates to be missed or updated late  The volume of ICPs affected by the late updates is small therefore the impact is low.	
Actions taken to resolve the issue		Completion date
Status and MEP nominations have been corrected as at time of audit		July 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Additional manual processes have been put in place to capture all disconnection statuses for ICPs that have been recently onboarded and therefore increase the controls.		20.08.2018

Management of “active” status		
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: 30-Jun-18</p>	<p>Incorrect status recorded for 18 ICPs (32%) in the registry and SAP.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as weak as the existing discrepancy reporting is not identifying status misalignments.</p> <p>The audit risk is rated as low as the volume of ICPs with potential status misalignments is small, but this will be affecting ICP day accuracy and other participants if an ICP switches away at the incorrect status.</p>	
Actions taken to resolve the issue		Completion date
All status misalignments from audit sample set have been reviewed and created.		20.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
As of 20.08.2018 a additional process has been implemented to check and reconcile a status misalignments for status 1,4 1,6 and 1,9 while we work to improve automated reporting.		20.08.2018
		Identified

Management of “inactive” status			
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: 30-Jun-18</p>	<p>Incorrect status recorded for 18 ICPs (32%).</p> <p>Credit disconnections not updated on the registry or SAP for each full day of no power.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as weak as the existing discrepancy reporting is not identifying status misalignments.</p> <p>The audit risk is rated as low as the ICPs not updated for disconnection (incorrect status updates and credit disconnections) will affect ICP day accuracy and other participants if an ICP switches away at the incorrect status.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All status misalignments have been corrected during or after the audit		July/August 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As of 20.08.2018 an additional process has been implemented to check and reconcile a status misalignments for status 1,4 1,6 and 1,9 while we work to improve automated reporting. This has added an additional control to the process.		20.08.2018	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: 5 Schedule 11.3 From: 19-Mar-18 To: 10-May-18	One late CS file. Potential impact: None Actual impact: Low Audit history: Three Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as risk is mitigated to an acceptable level. The audit risk rating is low as only one late CS file was sent.	
Actions taken to resolve the issue		Completion date
This was the human error and there was no read in between. System enhancement is required to calculate the average daily consumption. Retraining has been completed.		July 2018
Preventative actions taken to ensure no further issues will occur		Completion date
A system enhancement is dependent on EA's consideration to remove the "average daily consumption" from CS files – this was discussed in Switch Technical forum in Feb'18 and we anticipate it will form part of the EA omnibus changes		2020

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: 10(1) Schedule 11.3</p> <p>From: 22-Dec-17</p> <p>To: 05-Jan-18</p>	<p>A small number of late CS files.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as strong as risk is mitigated to an acceptable level.</p> <p>The audit risk rating is low as only one ICP of the 72 ICPs sampled was found to have a late CS file sent.</p>	
Actions taken to resolve the issue		Completion date
This was a human error. It's a very rare occurrence. And happened during a period of extended public holidays. The file was sent on day Zero, however, did not hit the registry. Hence, was sent the next day as appeared in breach report.		December 2017
Preventative actions taken to ensure no further issues will occur		Completion date
We have reviewed our processes and have improved our management of the breach report and work from day 5 to ensure no late files are sent.		August 2018

Losing trader determines a different date - switch move		
Non-compliance	Description	
Audit Ref: 4.9 With: 10(2) Schedule 11.3 From: 15-Apr-18 To: 04-May-18	One ICP switch event date set earlier than the gaining trader's requested date. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as risk is mitigated to an acceptable level. The audit risk rating is low as only one ICP was found to have an incorrect event date.	
Actions taken to resolve the issue		Completion date
GBUG has reviewed process and incorporated to send withdrawals before AN files are sent. This has been implemented to ensure no further occurrences.		August 2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A		
		Identified



Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: 12 of schedule 11.3 From: 28-Jun-17 To: 12-Feb-18	One late RR file. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as risk is mitigated to an acceptable level. The audit risk rating is low as only one late RR file was recorded for the audit period.	
Actions taken to resolve the issue		Completion date
As happened in this case, as soon as it was identified RR was sent.		December 17
Preventative actions taken to ensure no further issues will occur		Completion date
This has been raised in EA forum to get guidance on how to be compliant in situations where a RR is required but it is outside of the allowed timeframe.		2020 (EA dependant)
		Investigating

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: 17 of Schedule 11.3</p> <p>From: 28-May-17</p> <p>To: 11-Jun-18</p>	<p>Seven late switch withdrawals.</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	
<b>Low</b>	<p>The controls are rated as strong as risk is mitigated to an acceptable level.</p> <p>I have recorded the audit risk rating as low as these are actioned as soon as possible with the intent that submission is as accurate as possible.</p>	
Actions taken to resolve the issue		Completion date
We have a robust process in place. Subsequent, actions were taken as they were in best interest of the customer and Globug.		June 2018
Preventative actions taken to ensure no further issues will occur		Completion date
And this has been raised in EA forum to get guidance on how to be compliant in situations where a withdrawal is required but it is outside of the allowed timeframe. As these are triggered by customer interactions, and the customer is not a participant under the code, the retailer is relying upon customers engaging within the code timeframes without understanding or probably caring that if they don't the retailer will incur a non-compliance.		2020 (EA dependant)
		Investigating

Electricity conveyed		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13  From: 01-Jul-17 To: 30-Jun-18	Energy is not metered and quantified according to the code where meters are bridged. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are moderate as bridging only occurs when a soft reconnection cannot be performed after hours.  The volume of bridged meters is small, and all have consumption estimated for the bridged period therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Going forward the duration of bridging period will be provided to the metering team to reconcile usage in SAP. These changes to the process have been implemented.		20.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A. Changes to process have been implemented		20.08.2018

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: 7(1) &amp; (2) of schedule 15.2</p> <p>From: 04-Aug-15</p> <p>To: 13-Feb-18</p>	<p>Exceptional circumstances not proven for two ICPs 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	
<b>Low</b>	<p>The controls are rated as moderate as Globug use AMI meters, but where these can't be installed and the ICP isn't switched away these sites remain unread.</p> <p>The audit risk rating is low as the volume of ICPs affected by this is small.</p>	
Actions taken to resolve the issue		Completion date
We have amended our current vacant disconnection process to not exclude non AMI meters and an non communicating meters.		27.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as addressed by above.		N/A

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: 8(1) & (2) of schedule 15.2  From: 01-Jul-17 To: 30-Jun-18	Exceptional circumstances not proven for 17 ICPs not read for 12 months. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as Globug use AMI meters, but where these can't be installed and the ICP isn't switched away these sites remain unread. The audit risk rating is low as the volume of ICPs affected by this is small.	
Actions taken to resolve the issue		Completion date
Same as 6.8. We have amended our current vacant disconnection process to include non AMI meters and an non communicating meters.		27.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as above		27.08.2018

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: 9(1) & (2) of schedule 15.2  From: 01-Mar-18 To: 30-Jun-18	Exceptional circumstances not proven for eight ICPs not read for four months. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as Globug use AMI meters, but where these can't be installed and the ICP isn't switched away these sites remain unread. The audit risk rating is low as the volume of ICPs affected by this is small.	
Actions taken to resolve the issue		Completion date
Same as 6.8. We have amended our current vacant disconnection process to include non AMI meters and an non communicating meters		27.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as above		27.08.2018

Correction of NHH meter readings		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 19(1) Schedule 15.2  From: 01-Aug-17 To: 31-Jul-18	Corrections for bridged meters not apportioned to the correct date range. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong with regard to identification and estimation of bridged periods, but they are weak with regard to correction for the appropriate date range. Overall, I have recorded the controls as moderate.  The impact on settlement is minor therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Going forward the duration of bridging period will be provided to the metering team to reconcile usage in SAP. These changes to the process have been implemented.		20.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as the above clears the issue		20.08.2018

Meter data used to derive volume information		
Non-compliance	Description	
<p>Audit Ref: 9.3</p> <p>With: Clause 3(5) Schedule 15.2</p> <p>From: 01-Aug-17</p> <p>To: 31-Jul-18</p>	<p>Raw meter data is rounded upon receipt and not when volume information is created.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>There are no controls to prevent rounding of raw meter data, the system is designed to round as soon as the data arrives.</p> <p>There is no impact because no consumption information is “missing”, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Currently we receive all AMI read files where the readings are with decimal points. We store the original unconverted read files for all.</p> <p>For AMS and ARCS we round off the readings outside SAP before importing data into SAP. This is something we will investigate changing.</p> <p>However, the original unconverted reading will still not show in our billing system.</p> <p>We are currently investigating a solution. Globug would question why the risk rating is 5 if the impact is low even without controls.</p>		October 2019
Preventative actions taken to ensure no further issues will occur		Completion date
		Investigating



Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2  From: 01-Aug-17 To: 31-Jul-18	Event information not received from ARC Innovations. Potential impact: Medium Actual impact: Unknown Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are recorded as moderate because they mitigate risk most of the time. The impact is unknown but other validation steps are likely to ensure most issues are identified. I have recorded the audit risk rating as low.	
Actions taken to resolve the issue		Completion date
We will be talking to Arc to request event logs be provided from 27.08.2018.		27.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as above		27.08.2018

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Aug-17 To: 31-Jul-18	ICP days submitted for inactive periods. Potential impact: Medium Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as moderate because they mitigate risk most of the time. There is no impact on settlement or other participants. I have recorded the audit risk rating as low.	
Actions taken to resolve the issue		Completion date
As per the recommendation response on page 18, we are currently assessing improvements to automated discrepancy reporting, but this is an iterative process. In the meantime, the new process for manual reconciliation of registry discrepancies mentioned in the comments for 3.8 and 3.9 is intended to fill this gap, and allow us to update the inactive-vacant group of ICPs reliably.		October 2019
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as above		
		Investigating

Allocation of submission information		
Non-compliance	Description	
Audit Ref: 12.3 With: Clause 15.5  From: 01-Aug-17 To: 31-Jul-18	Corrections for bridged meters not apportioned to the correct date range. ICPs at the incorrect status causing volume to be allocated incorrectly. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong with regard to identification and estimation of bridged periods, but they are weak with regard to correction for the appropriate date range and ICPs being recorded at the incorrect status. Overall, I have recorded the controls as moderate.  The impact on settlement is minor therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Going forward the duration of bridging period will be provided to the metering team to reconcile usage in SAP. These changes to the process have been implemented.		20.08.2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A. Changes to process have been implemented		20.08.2018

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 of schedule 15.2  From: 01-Aug-17 To: 31-Jul-18	Estimates made permanent at 6 months, but reasonable endeavours not used to obtain meter readings. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because most volume information is from validated meter readings.  The impact on settlement is minor therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Same as 6.8. We have amended our current vacant disconnection process to include non AMI meters and an non communicating meters. Non-communicating meters provide an estimation scenario. These are identified and managed on a weekly basis to resolve the issue. The auditor identified inactive sites were the issue and the process has now changed to include them.		July 2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as above		

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 of schedule 15.3 From: 01-Aug-17 To: 31-Jul-18	80% HE threshold not met for some NSPs. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because most thresholds are met. The impact on settlement is minor therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Same as 6.8, 12.8. We have amended our current vacant disconnection process to include non AMI meters and an non communicating meters. Non-communicating meters provide an estimation scenario. These are identified and managed on a weekly basis to resolve the issue. The auditor identified inactive sites were the issue and the process has now changed to include them.		July 2018
Preventative actions taken to ensure no further issues will occur		Completion date
N/A as above		
		Identified