

## COMPLIANCE PLAN FOR ECOTRICITY

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2  From: 01-Mar-18 To: 30-Oct-18	Incorrect profile for ICPs with embedded generation installed, incorrect information for SUML  Potential impact: Low  Actual impact: Low  Audit history: Twice previously  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. The new process implemented by Ecotricity should successfully address this non-compliance. 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
Embedded generation profiles have been corrected. SUMLs have been corrected.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Embedded generation profiles have been corrected. SUMLs have been corrected.		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: 15.35</p> <p>From: 20-Jul-18</p> <p>To: 30-Oct-18</p>	<p>Meter Reading Frequency report not sent since July'18</p> <p>Potential impact: Low</p> <p>Actual impact: None</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		
<b>Low</b>	<p>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). The audit risk rating is low because the impact on the settlement outcome is none (small number of ICPs).</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The handover of reporting from the previous and since departed reporting manager to the new reporting manager was not complete.</p> <p>The MRF has been provided and will occur monthly.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The handover of reporting from the previous and since departed reporting manager to the new reporting manager was not complete.</p> <p>The MRF has been provided and will occur monthly.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 01-Mar-18</p> <p>To: 30-Oct-18</p>	<p>Late trader's updates to registry, delayed updates to ICPs "active" status</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate. The new process of synchronising the registry information and ORION should decrease number of late updates. Incorrect information of the ICPs status can affect switching and customer invoicing. Impact on settlement outcome is minor due to number of ICPs. Audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Previously used Agility ICP registry syncing functionality has proven to be sporadic.</p> <p>Ecotricity now runs its own ICP registry synchronisation reports weekly and compares this with the ICP Registry LIS file.</p> <p>More specifically for Active customer not on Agility, Ecotricity has made a process decision to only update new ICPs once the MEP data has been uploaded as Agility does not cope with new ICPs being added without meter information.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Previously used Agility ICP registry syncing functionality has proven to be sporadic.</p> <p>Ecotricity now runs its own ICP registry synchronisation reports weekly and compares this with the ICP Registry LIS file.</p> <p>More specifically for Active customer not on Agility, Ecotricity has made a process decision to only update new ICPs once the MEP data has been uploaded as Agility does not cope with new ICPs being added without meter information.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: 17 of Schedule 11.1</p> <p>From: 01-Mar-18</p> <p>To: 30-Oct-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: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate because they require some adjustment. Minor impact on settlement outcomes. Audit risk rating is low because a small number of ICPs are affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Previously used Agility ICP registry syncing functionality has proven to be sporadic.</p> <p>Ecotricity now runs its own ICP registry synchronisation reports weekly and compares this with the ICP Registry LIS file.</p> <p>More specifically for Active customer not on Agility, Ecotricity has made a process decision to only update new ICPs once the MEP data has been uploaded as Agility does not cope with new ICPs being added without meter information.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Previously used Agility ICP registry syncing functionality has proven to be sporadic.</p> <p>Ecotricity now runs its own ICP registry synchronisation reports weekly and compares this with the ICP Registry LIS file.</p> <p>More specifically for Active customer not on Agility, Ecotricity has made a process decision to only update new ICPs once the MEP data has been uploaded as Agility does not cope with new ICPs being added without meter information.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: 19 of Schedule 11.1</p> <p>From: 01-Apr-18</p> <p>To: 30-Oct-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: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate as they require additional improvement. Additional training was provided to switching team. Minor impact on settlement outcomes. Audit risk rating is low because of a small number of ICPs</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Previously used Agility ICP registry syncing functionality has proven to be sporadic.</p> <p>Ecotricity now runs its own ICP registry synchronisation reports weekly and compares this with the ICP Registry LIS file.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Previously used Agility ICP registry syncing functionality has proven to be sporadic.</p> <p>Ecotricity now runs its own ICP registry synchronisation reports weekly and compares this with the ICP Registry LIS file.</p>		12/12/2018	

Non-compliance	Description		
Audit Ref: 4.2 With: 3 of Schedule 11.3  From: 07-Sep-18 To: 13-Sep-18	One AN file late by one day; incorrect AN response Code in a small number of AN files Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as strong. Only one AN file was late in the period covered by this audit and small number of incorrect of Response Code in AN files, which does not have any impact on settlement outcomes is none. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching processes are a strong part of the Ecotricity operation. We will continue to monitor any issues as they become apparent.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required as existing checks and processes are thorough.		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 6(1) of Schedule 11.3</p> <p>From: 01-Mar-18</p> <p>To: 30-Oct-18</p>	<p>12 ICPs were not switched on the same reading</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate. It is a manual well managed process. Only 12 ICPs did not switch on the same reading (NHH to HHR). Minor impact on settlement outcomes because of the small number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching processes are a strong part of the Ecotricity operation. We will continue to monitor any issues as they become apparent.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Ecotricity however uses smart meter reads for opening reads and requests, via RR's for losing retailers to use the same reads.</p> <p>We welcome the move for all retailers to use closing HHR reads.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: 10(1) of Schedule 11.3</p> <p>From: 22-Mar-18</p> <p>To: 31-Aug-18</p>	<p>Incorrect AN response Code in a small number of AN files</p> <p>Potential impact: None</p> <p>Actual impact: None</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		
<b>Low</b>	<p>The controls are recorded as strong. Only one AN file was late in the period covered by this audit. The impact on settlement outcomes is none. Audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching processes are a strong part of the Ecotricity operation. We will continue to monitor any issues as they become apparent.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required as existing checks and processes are thorough.		12/12/2018	



Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: 12 of Schedule 11.3</p> <p>From: 01-Mar-18</p> <p>To: 30-Oct-18</p>	<p>2 ICPs were not switched on the same read</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate. It is a manual well managed process. Only 3.1% of ICPs did not switch on the same read. Minor impact on settlement outcomes because of the small number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching processes are a strong part of the Ecotricity operation. We will continue to monitor any issues as they become apparent.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Ecotricity however uses smart meter reads for opening reads and requests, via RR's for losing retailers to use the same reads.</p> <p>We welcome the move for all retailers to use closing HHR reads.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: 11.14(6)(7)</p> <p>From: 01-Mar-17</p> <p>To: 30-Oct-18</p>	<p>Daily Unmetered kWh are not recorded for shared unmetered load for five ICPs</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: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>There were no controls to identify shared unmetered load as a part of a newly gained ICP. Orion does not have the functionality to calculate UML volumes for HHR reconciled ICPs. Minor impact on settlement outcomes. Audit risk rating recorded as low because of low daily kWh and a small number of ICPs. However, systems have now been set up to record these volumes. First file will be submitted in Dec'18 (day13)</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Ecotricity now have a fully functional UML and SUML system to reconcile unmetered loads. This affects 104 kWh per month so has a minor impact.</p> <p>Agility is only able to automatically reconcile NHH UML (1 ICP = 71 kWh per month) which was occurring correctly.</p> <p>However UML on HHR sites (6 sites, 35 kWh total) is now being processed each month and being added to the relevant GXP,NSP,DLFs NHH AV-080 volumes per month.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Systems are now set up to record and report UMLs on HHR sites.</p> <p>Future AV-080 volumes and revisions will include HHR UML volumes.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: 8(1)(a) of Schedule 15.2</p> <p>From: 01-Jul-18</p> <p>To: 30-Nov-18</p>	<p>Ecotricity did not have 100% attainment in the previous 12 months for 14 NSPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating2</p>		
Audit risk rating	Rationale for audit risk rating		
<p><b>Low</b></p>	<p>The controls are recorded as moderate because there was not well-structured process in place to assure compliance is met. Now the process has been modified but the resolution has not been in place for appropriate time to record controls as strong Impact on settlement outcomes is minor because ORION estimates data at the end of each month and not many ICPs are traded as NHH for 12 months. Further, Ecotricity's business strategy is to replace legacy meters with a smart meters.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Ecotricity confirms the hand over of this report from one reporting manager to the next has been lacking.</p> <p>The Meter Read Frequency report will now be issued to the EA.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The Reading Frequency report will be submitted as required regularly.</p> <p>A How to Document has been updated to ensure there are many people that operate this task.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: 9(1) of Schedule 15.2</p> <p>From: 01-Jul-18</p> <p>To: 30-Nov-18</p>	<p>The target of 90% was not achieved for 12 NSPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</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 recorded as moderate because there was not well-structured process in place to assure compliance is met. Now the process has been modified but the resolution has not been in place for appropriate time to record controls as strong Impact on settlement outcomes is minor because ORION estimates data at the end of each month. Further, Ecotricity's business strategy is to replace legacy meters with a smart meters.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Over 93% of Ecotricity ICPs are HHR / HHA certified meters. All NHH legacy meters are upgraded to HHR where possible when customers join Ecotricity.</p> <p>Of the remaining NHH meters, Ecotricity is continually revisiting the ability to upgrade these meters to HHR communicating meters.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Meter Frequency reports have been provided and show in fact that Ecotricity does have higher than required meter reading statistics.</p> <p>However, because Ecotricity is a new retailer, and in particular in new and smaller networks to Ecotricity, there will always be the statistical chance of less than 90% reads each 4 months occurring per GXP.</p> <p>Overall however, we have 590 NHH 4 month ICPs, of which 568 have been read in the last 4 months which represents 96%.</p>		12/12/2018	

Non-compliance	Description		
Audit Ref: 9.6 With: 17 of Schedule 15.2 From: 01-Mar-18 To: 30-Oct-18	HHR data is not checked for unexpected 0 values 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, they do not cover all requirements of this clause e.g. "unexpected 0 values". Low risk rating is assigned due to impact on settlement outcomes is minor		
Actions taken to resolve the issue		Completion date	Remedial action status
Ecotricity runs exception reports every month on all ICPs which includes; <ul style="list-style-type: none"> <li>- Exceptional changes of volumes</li> <li>- Exceptional changes of dollar amounts invoiced</li> <li>- Exceptions changes in days bills</li> </ul>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ecotricity has developed a zero reads process which looks for zero reads under certain circumstances, but excludes other circumstances, for instance solar generation at night.		12/12/2018	

Non-compliance	Description		
Audit Ref: 12.2 With: 15.4  From: 01-Mar-18 To: 30-Oct-18	Volumes for ICP 1001292857LC797 were not submitted for months before March'18 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 monitoring process needs improvement. Audit risk rating is recorded as low as impact on settlement outcomes is minor		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted the standard Agility ICP Registry syncing tools have been spasmodic.  Ecotricity now has ICP registry tools which sync outside of the Agility platform and has far more functionality and flexibility to ensure all situations / ramifications are covered including ICPs on the registry but not on Agility.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ecotricity now has ICP registry tools which sync outside of the Agility platform and has far more functionality and flexibility to ensure all situations / ramifications are covered including ICPs on the registry but not on Agility.		12/12/2018	

Non-compliance	Description		
Audit Ref: 12.7 With: 15.1  From: 01-Jun-18 To: 30-Oct-18	The most recent seasonal adjustment file (GR-030) was not used for the calculations of historical estimates  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 the situation has been rectified and the period of incorrect GR-030 used for submissions was short. Minor impact on settlement outcomes is noted. Audit risk rating recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The reporting function has been transferred between staff effectively.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The GR-030 files will be updated monthly and for all revision cycles.		12/12/2018	

Non-compliance	Description		
Audit Ref: 12.8 With: 4 of Schedule 15.2  From: 01-Apr-18 To: 30-Oct-18	Permanence of meter reading for the period Feb'17 to Aug'17 not achieved Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	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 management of NHH reads improved since the last audit but it is still not as good as it should be. 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
Noted and we will be improving this process.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Noted and we will be improving this process.		Early 2019	



Non-compliance	Description		
<p>Audit Ref: 12.9</p> <p>With: 2(c) of Schedule 15.3</p> <p>From: 01-Apr-18</p> <p>To: 30-Oct-18</p>	<p>Shared unmetered load ICPs are not reconciled. Incorrect profile used for embedded generation</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice before</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate because there are some improvements that can be made to them. Audit risk rating is recorded as low because volume of shared unmetered load is low. Incorrect profile for embedded generation is bigger issue but impact on settlement outcome is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We now have a fully functional SUML process for capturing all SUML sites. Further, and as noted above, we have a comprehensive system for reconciling the ICP registry and the Agility database.		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>ICP registry and the Agility database will be synchronised weekly using a new system that will capture Profiles and other changes on the registry.</p> <p>NHH sites that were previously EG1 now are now PV1 unless we are aware a battery has been installed.</p>		12/12/2018	

Non-compliance	Description		
<p>Audit Ref: 12.11</p> <p>With: 4 of Schedule 15.3</p> <p>From: 01-Mar-18</p> <p>To: 30-Oct-18</p>	<p>Incorrect calculation of historical estimates for a small number of scenarios conducted by ORION</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate because there are some improvements that can be made to them. It is on-going problem of ORION. It has improved since the last audit. Audit risk is recorded as low as impact on settlement outcomes is minor</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We note there were a number of HE issues with Agility in the previous audit. These have by and large been resolved by Agility updating the code to calculation HE's.</p> <p>There are however some unique situations where HE's are slightly mis-calculated, but which have minimal impact on volumes reported.</p>		12/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Ecotricity will continue to put pressure on Agility to fix the slight HE calculations in the unique circumstances which are still not performing 100%.</p>		12/12/2018	