

Compliance plan for Paua to the People

Title: Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: Oct 2017</p> <p>To: Nov 2017</p>	<p>An incorrect NSP was temporarily recorded for one ICP.</p> <p>An incorrect status was temporarily recorded for three ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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 they ensure data is recorded correctly most of the time. The issues identified were caused by manual processing errors, and controls have been strengthened to prevent recurrence.</p> <p>The impact is low because only three ICPs were affected.</p> <ul style="list-style-type: none"> For the status discrepancies, the correct status was recorded in Paua's system, so submissions were correct. The discrepancy has now been corrected. For the NSP discrepancy, both NSPs were within the same balancing area, and the data was corrected. 	
Actions taken to resolve the issue		Completion date
Status and NSP changes were corrected to the correct dates in the Registry.		8/2/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Controls have been significantly strengthened over the period and we note that two of the errors occurred before the process was strengthened and the last change (1001147041CK514) had been picked up but the change was not to the correct date. The recent changes to our systems and processes will ensure that the correct date is applied where changes to the NSP occur.</p> <p>We consider that the controls in place are now adequate to ensure compliance.</p>		8/2/2018
		Cleared

Title: Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: April, October and December 2017	Five late status updates. 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	The controls are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement. The risk is low as a small number of updates were affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Status changes were corrected to the correct dates in the Registry.		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Since our Audit GIVE have; <ol style="list-style-type: none"> 1. Upgraded our processes to embed status changes into the disconnection process; and 2. Changed our reconciliation processes and system to capture any variance between status on our systems and the Registry. The process change ensures that variances are picked up and can be investigated and corrected before any reports are submitted to the Reconciliation Manager. We suggest that the controls now in place should be considered as strong.		8/2/2018	

Title: Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19</p> <p>Schedule 11.1</p> <p>From: 27-Apr-17</p> <p>To: 12-Jan-18</p>	<p>One ICP had an incorrect status code applied. It has now been corrected and will be reported correctly for revision submissions.</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>Controls are rated as moderate as they are sufficient to prevent the risk of incorrect status codes being applied most of the time. The risk rating is low as only one ICP was affected, and it was a manual processing error.</p>	
Actions taken to resolve the issue		Completion date
Status update was corrected. The change will be picked up in the next revision of the reconciliation reports.		8/2/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Since our Audit GIVE have;</p> <ol style="list-style-type: none"> 1. Upgraded our processes to embed status changes into the disconnection process; and 2. Changed our reconciliation processes and system to capture any variance between status on our systems and the Registry. The process change ensures that variances are picked up and can be investigated and corrected before any reports are submitted to the Reconciliation Manager. <p>We consider that the controls in place are now adequate to ensure compliance</p>		8/2/2018
		Identified

Title: Losing trader response to switch request and event dates - standard switch			
Non-compliance	Description		
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 02-Nov-17 To: 02-Nov-17	The "AA" (accept and acknowledge) was applied for one ICP with advanced metering installed. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, and the risk is assessed as low. Only one exception was identified, and it was due to human error.		
Actions taken to resolve the issue		Completion date	Remedial action status
No further action possible.		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This one occurrence happened due to a keying error. We consider that the controls in place are adequate to ensure compliance.		8/2/2018	

Title: Losing trader must provide final information - standard switch			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: June and August 2017	Two CS files contained incorrect readings. 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 ensure CS data is correct most of the time. The exceptions occurred during a period of very high workload and were manual processing errors.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken.		8/2/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>GIVE made improvements to our systems during the year to have closing reads displayed on the CS required notification. Since introducing the new system in August 2017 no further errors have occurred.</p> <p>We consider that the controls in place are strong and are adequate to ensure compliance.</p>	8/2/2018	

Title: Retailers must use same reading - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: July 2017</p>	<p>The agreed switch read was not applied for three transfer switches.</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 rated as moderate, because in most cases RRs were treated correctly. In most cases RR requests issued meet the requirements of Clause 6(2) and (3) Schedule 11.3, which the losing trader is required to accept. If a switch read is estimated the issue does not occur.</p> <p>The breach risk rating is low, as the total under reported was 50 kWh. Process improvements have been made to reduce the likelihood of incorrect treatment of rejected RR files.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>GIVE has recently added functionality to highlight when RR reads have been rejected which will enable us to follow up any rejections of our RR Switches. We would like to note that our RR Switches are all based on actual data supplied to us by the MEP (Vector AMS). Rejections of our RR Reads tend to occur for reasons outside our control including;</p> <ol style="list-style-type: none">1. Where the losing retailer has provided an incorrect “Actual Read” – we have already raised this with the EA but it still causes issues when these traders refuse to accept a different (correct) actual read.2. Late delivery of data by the MEP (to be fair this has improved over the year) which allows the losing retailer to reject the read because it is late3. Where the losing trader has drawn out the switch so long that they reject the Actual Read because it is late <p>Storing incorrect opening reads in systems that are designed to be very accurate in reads and HH data will cause us problems.</p> <p>GIVE also do not understand how to reconcile incorrect reads for ICP on HHR profiles as HH data needs to match the raw data supplied by the MEP.</p>	8/2/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>With the changes already made to our systems we consider that the controls in place are strong and are adequate to ensure compliance.</p>	8/2/2018	

Title: Losing trader provides information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1)</p> <p>Schedule 11.3</p> <p>From: 31-Mar-17</p> <p>To: 25-Jun-17</p>	<p>Switch event dates were earlier than the requested date for three switches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>Controls are rated as strong. No instances of incorrect event dates were identified after 25/06/2017 for switch moves, and the early dates were set for valid reasons.</p> <p>The impact is assessed as low, because the differences were all less than three days, and resulted in Paua's period of supply being removed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken as GIVE was the losing retailer.		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We changed our disconnection process to ensure this no happens. There have been no instances since the change in process in August 2017.</p> <p>With the changes already made to our systems we consider that the controls in place are strong and are adequate to ensure compliance.</p>		8/2/2018	

Title: Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With: Clause 12</p> <p>Schedule 11.3</p> <p>From: May and December 2017</p>	<p>The agreed switch read was not applied for two switch moves.</p> <p>One RR request contained a requested reading inconsistent with the HHR data.</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>Controls are rated as moderate, because in most cases RRs were treated correctly. In most cases RR requests issued meet the requirements of Clause 6(2) and (3) Schedule 11.3, which the losing trader is required to accept. If a switch read is estimated the issue does not occur.</p> <p>The breach risk rating is low, as the total under reported was 22 kWh. Process improvements have been made to reduce the likelihood of incorrect treatment of rejected RR files.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments for 4.4 above.		8/2/2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>GIVE made improvements to our systems during the year to have closing reads displayed on the CS required notification. Since introducing the new system in August 2017 no further errors have occurred.</p> <p>With the changes already made to our systems we consider that the controls in place are strong and are adequate to ensure compliance.</p>	8/2/2018	

Title: Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 10-Jul-17</p> <p>To: 12-Jul-17</p>	<p>One withdrawal acknowledgement was two business days late.</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		
Low	Controls are rated as strong as they are sufficient to mitigate risk most of the time. Only one AW was sent late.		
Actions taken to resolve the issue		Completion date	Remedial action status
No action taken as GIVE never supplied the customer.		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>GIVE always seeks to provide a good switching experience to our customers.</p> <p>NW switches are sometimes difficult to obtain confirmation of the customers desire to reverse the switch in a timely fashion. In our experience we have noted numerous instances where losing retailers send an NW without explicit consent from the Customer. Often this is due to a “misunderstanding” from the losing retailer – especially where a dual fuel customer is only switching their electricity. Accepting an NW then attempting to reverse it (starting the switch process again) is a very poor experience for customers.</p> <p>We have now changed our processes to accept NW if the customer has not responded.</p> <p>With the change already made to our processes we consider that the controls in place are strong and are adequate to ensure compliance.</p>	8/2/2018	
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Title: Electronic meter readings and estimated readings			
Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: Clause 17</p> <p>Schedule 15.2</p> <p>From: March 2016</p> <p>To: December 2017</p>	<p>Meter event reports were not reviewed prior to January 2018, but are now reviewed and actioned weekly.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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, because a weekly review of meter event information is now occurring.</p> <p>The audit risk rating is low, as most events affecting meter accuracy would be detected through Paua’s other validation processes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
None taken.		8/2/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We now upload and check these weekly.		8/2/2018	

Title: Calculation of ICP days			
Non-compliance	Description		
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Apr-17</p> <p>To: 01-Jan-18</p>	<p>One NSP change was not processed from the correct date for ICP 1001147041CK514, which resulted in ICP days temporarily being reported against an incorrect NSP. Paua's records have been updated and revision submissions will be correct.</p> <p>Inactive ICP days are included in the ICP days submission.</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		
Low	<p>The risk rating is moderate as controls are adequate to ensure that submissions are accurate most of the time, but there is room for improvement in relation to submission of inactive ICP days.</p> <p>The impact is low, ICP days were only reported for one inactive ICP in November 2017, and there was no impact on reconciliation. The issue relating to an incorrect NSP change date has now been corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Status change corrected on the Registry.		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>This ICP was picked up as having a NSP different from the Registry. The date was incorrect as in our systems it was applied at the start of the following month. We have now changed our system to record the NSP on a daily basis and changed our processes to update billing records to backdate to the date that the change was made.</p> <p>With the changes already made to our systems & processes we consider that the controls in place are strong and are adequate to ensure compliance.</p>		8/2/2018	

Title: HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Apr-17</p> <p>To: 01-Jan-18</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p>Some data accuracy issues were identified:</p> <ul style="list-style-type: none"> • injection volumes were temporarily incorrectly classified as flow direction X for ICP 1001153549CKC64 • volumes were temporarily recorded against an incorrect NSP for ICP 1001147041CK514, because an NSP change was processed from an incorrect date • ICPs 0000008330TRDC5, 1001136871UND85 and 1001157086CK7D0 were temporarily excluded from submissions due to incorrect status, or missed volume estimations. • Paua's records have been updated, and the affected ICPs will be reported correctly on future submissions and revisions. <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>The issue relating to content of the aggregates file is an error in the code, Paua is providing submission information as expected.</p> <p>The issues relating to temporarily incorrect NSP, injection volumes, and incorrect inactive status were isolated incidents, which have now been corrected. Corrections have been processed for all affected ICPs, and submission information has been, or will be, washed up. Process changes have been implemented to prevent recurrence of these issues.</p> <p>The impact is considered low:</p> <ul style="list-style-type: none"> • for ICP 1001147041CK514, the new and old NSPs were within the same balancing area and there was no impact on reconciliation • for ICP 1001153549CKC64, the generation volume for November 2017 was 4.9 kWh. 		
Actions taken to resolve the issue		Completion date	Remedial action status
Both errors will be corrected in future revisions of the reconciliation reports.		8/2/2018	Identified

Audit risk rating	Rationale for audit risk rating		
Low	<p>The issues relating to temporarily incorrect NSP, injection volumes, and incorrect inactive status were isolated incidents, which have now been corrected. Corrections have been processed for all affected ICPs, and submission information has been, or will be, washed up. Process changes have been implemented to prevent recurrence of these issues.</p> <p>The switch read issues are expected to occur rarely, as Paua only supplies ICPs with AMI metering installed and the CS and AMI reads will usually match. Manual processing errors occurred during a period of high workload, and are expected to reduce.</p> <p>Only seven ICPs with an inactive status are currently supplied.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments in 11.4.		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>GIVE have amended our processes to ensure the correct date is applied to changes in NSP.</p> <p>GIVE have developed a process for any further generation ICP (our general policy is not to accept them). We have also made changes to our system to correct the reporting of generation kWh from reconciliation reports.</p> <p>With the changes already made to our systems & processes we consider that the controls in place are strong and are adequate to ensure compliance.</p>		8/2/2018	

Title: Provision of submission information to the RM	
Non-compliance	Description
<p>Audit Ref: 13.1</p> <p>With: Clause 8 Schedule 15.3</p> <p>From: September 2017</p> <p>To: December 2017</p>	<p>Two ICPs had their data incorrectly aggregated:</p> <ul style="list-style-type: none"> injection volumes were temporarily incorrectly classified as flow direction X for ICP 1001153549CKC64 volumes were temporarily recorded against an incorrect NSP for ICP 1001147041CK514. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The issues were isolated incidents, which have now been corrected. Corrections have been processed for the affected ICPs, and submission information has been, or will be, washed up. Process changes have been implemented to prevent recurrence of these issues.</p> <p>The impact is considered low:</p> <ul style="list-style-type: none"> for ICP 1001147041CK514, the new and old NSPs were within the same balancing area and there was no impact on reconciliation for ICP 1001153549CKC64, the generation volume for November 2017 was 4.9 kWh. 		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments in 11.4		8/2/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>GIVE have amended our processes to ensure the correct date is applied to changes in NSP.</p> <p>GIVE have developed a process for any further generation ICP (our general policy is not to accept them). We have also made changes to our system to correct the reporting of generation kWh from reconciliation reports.</p> <p>With the changes already made to our systems & processes we consider that the controls in place are strong and are adequate to ensure compliance.</p>		8/2/2018	