

## Compliance plan for WEL Networks and OurPower

Title: Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 28-Feb-18</p> <p>To: 04-Oct-18</p>	<p><b>OurPower</b></p> <p>0077473538WE739 had an incorrect submission type recorded on the registry for 28/02/18 to 05/03/18.</p> <p>Three ICPs had T994 unknown ANZSIC codes recorded.</p> <p>Three disconnected ICPs did not have their status updated on the registry.</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	
<b>Low</b>	<p>The controls are rated as moderate, as they are sufficient to ensure that most registry information is correct but there is some room for improvement.</p> <p>The audit risk rating is low:</p> <ul style="list-style-type: none"> <li>• submission data was correct for ICP 0077473538WE739, and the incorrect data on the registry is for a short period</li> <li>• a small number of ICPs have unknown ANZSIC codes</li> <li>• the disconnected ICPs had the incorrect status code on the registry for a short time.</li> </ul>	
Actions taken to resolve the issue		Completion date
A list file will be run to identify non residential ANZSIC codes. These will be reviewed and updated where applicable.		10th November 2018
Preventative actions taken to ensure no further issues will occur		Completion date
ANZSIC codes will be programmed to be sent inclusive of the ICP file. Power BI will be used to highlight non residential codes including the T type codes. Manual changes will be made to the registry		30 November 2018
		Identified

Title: ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k)) of Schedule 11.1</p> <p>From: 04-Oct-18</p> <p>To: 04-Oct-18</p>	<p><b>OurPower</b></p> <p>Three ICPs have T994 don't know ANZSIC codes.</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	
<b>Low</b>	<p>The controls are rated as weak, as they are not sufficient to ensure ANZSIC codes are recorded correctly and rely on the compliance of the previous retailer.</p> <p>The audit risk rating is low because a small number of ICPs are affected.</p>	
Actions taken to resolve the issue		Completion date
As the ANZSIC codes were not being passed correctly from WEL to OurPower a fix will be implemented to pass all ANZSIC codes in the ICP file from WEL to OurPower		10 November 2018
Preventative actions taken to ensure no further issues will occur		Completion date
A LIS file will be run in the interim to identify all codes that require review until the fix is implemented		30 November 2018
Remedial action status		
Identified		

Title: Management of "inactive" status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 27-Aug-18</p> <p>To: 19-Sep-18</p>	<p><b>OurPower</b></p> <p>Three disconnected ICPs did not have their status updated to inactive on the registry.</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		
<b>Low</b>	<p>The controls are rated as moderate. The status update process is manual and was missed due to an oversight.</p> <p>The impact is assessed to be low, a small number of ICPs were affected for a short period.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
OurPower intends to automate in the long term the process for initiating the disconnection and reconnection. Part of the automation will include update to the registry.		31 January 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Until automation is available OurPower will still manually update the registry. This will be added to process flow.		16 October 2018	

Title: Losing trader response to switch request and event dates - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 09-Jul-18</p> <p>To: 19-Sep-18</p>	<p><b>OurPower</b></p> <p>Incorrect AN response codes were applied for ten transfer switches.</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		
<b>Low</b>	<p>The controls over AN responses are weak, because they are not sufficient to ensure that the correct response code is applied.</p> <p>The impact is assessed as low. Information available on the registry confirmed that the ICPs with incorrect response codes had advanced metering.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The WEL code has been changed to default the AD response code		03 October 2018	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
The WEL code has been changed to default the AD response code.	03 October 2018	

Title: Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 22-Jun-18</p> <p>To: 12-Sep-18</p>	<p><b>OurPower</b></p> <p>Five transfer CS files were incomplete.</p> <p>Potential impact: Medium</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	
<b>Low</b>	<p>The controls are rated as strong because the issue has been cleared. No incomplete CS files were issued after 27/08/18.</p> <p>The impact is assessed to be low. All incomplete CS files were corrected using the withdrawal process or by providing the required information to participants outside the switching process.</p>	
Actions taken to resolve the issue		Remedial action status
WEL updated the registry to ensure all registers were now set to Y for submit to the market.		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The above corrected the issue and all CS files since have included the I, M and R lines	27 August 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: 20-Dec-17</p> <p>To: 12-Sep-18</p>	<p><b>OurPower</b></p> <p>For three ICPs that switched in with estimated readings on WEL Networks meters, OurPower's start read did not match the losing trader's CS read.</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		
<b>Low</b>	<p>Controls are rated as moderate as they are sufficient to ensure that all consumption is captured most of the time, the issue relates to a small subset of switches where a WEL Networks meter is used for settlement by the losing retailer and is switched to OurPower on an estimated CS reading.</p> <p>The impact is assessed to be low, and will result in under submission by 920 kWh across the three ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We will alter the code to check the CS read and provide an exception for determination as to whether an RR is required		30 November 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
OurPower will alter the code to check the CS read and provide an exception for determination as to whether an RR is required		30 November 2018	

Title: Losing trader provides information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 07-Jul-18</p> <p>To: 17-Sep-18</p>	<p><b>OurPower</b></p> <p>Incorrect AN response codes were applied for 13 switch moves.</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		
<b>Low</b>	<p>The controls over AN responses are weak, because they are not sufficient to ensure that the correct response code is applied.</p> <p>The impact is assessed as low. Information available on the registry confirmed that the ICPs with incorrect response codes had advanced metering.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The code will be changed to derive if the premise is occupied and if so a OC code will be sent via the AN file		30 November 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The code will be changed to derive if the premise is occupied and if so a OC code will be sent via the AN file		30 November 2018	

Title: Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 10-Jul-18</p> <p>To: 07-Sep-18</p>	<p><b>OurPower</b></p> <p>Seven switch move CS files were incomplete.</p> <p>Potential impact: Medium</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		
<b>Low</b>	<p>The controls are rated as strong because the issue has been cleared. No incomplete CS files were issued after 27/08/18.</p> <p>The impact is assessed to be low. All incomplete CS files were corrected using the withdrawal process or by providing the required information to participants outside the switching process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
WEL updated the registry to ensure all registers were now set to Y for submit to the market.		27 August 2018	Cleared

Preventative actions taken to ensure no further issues will occur	Completion date	
WEL updated the registry to ensure all registers were now set to Y for submit to the market.	27 August 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: 03-May-18</p> <p>To: 04-Jul-18</p>	<p><b>OurPower</b></p> <p>Two AW files were issued late.</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		
<b>Low</b>	<p>The controls are assessed to be strong. The AW process is now automated, and late files are unlikely to occur.</p> <p>The impact is assessed to be low, the files were issued one and two days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
AW acceptance an rejections have been automated to ensure timings will be compliant for submission		Around July 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AW acceptance an rejections have been automated to ensure timings will be compliant for submission		Around July 2018	

Title: Calculation of ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.4 With: Clause 15.8</p> <p>From: 01-Feb-18 To: 31-Jul-18</p>	<p><b>OurPower</b> For submissions prior to the July 2018 initial, ICP days were excluded where the ICP was not supplied on the last day of the month.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as strong, because OurPower have resolved the issue which led to submission inaccuracy.</p> <p>The impact is assessed to be low. The total difference was 188 days across the affected revisions. Revised data will be washed up.</p>	
Actions taken to resolve the issue		Completion date
This has been corrected		Sep 2018
Preventative actions taken to ensure no further issues will occur		Completion date
This has been corrected		Sep 2018
Remedial action status		
Cleared		

Title: HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.4 With: Clause 15.8</p> <p>From: 01-Nov-17 To: 04-Oct-18</p>	<p><b>OurPower</b> HHR aggregates files do not contain electricity supplied information. ICPs which had switched out prior to the end of the month were incorrectly excluded from some submissions. ICP 000019688WE7BE did not have generation consumption reported with flow direction I in the September 2018 initial submission data.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1</p>	



Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The issue relating to content of the aggregates file is an error in the code, OurPower are providing submission information as expected.</p> <p>Controls are rated as strong, because OurPower have resolved the issues which led to submission inaccuracy.</p> <p>The impact is assessed to be low because revised data will be washed up. The total difference between the volumes and aggregates submissions was 1,470 kWh. One ICP with distributed generation was affected for the initial allocation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Most of the above have been corrected and the generation issue is being looked into		11 October 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Most of the above have been corrected and the generation issue is being looked into		11 October 2018	

Title: Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p>          <p>From: 20-Dec-17</p> <p>To: 30-Sep-18</p>	<p><b>OurPower</b></p> <p>For three ICPs, the start read applied by OurPower was inconsistent with the CS read.</p> <p>ICP 000019688WE7BE did not have generation consumption reported with flow direction I in the September 2018 initial submission data.</p> <p>ICPs which had switched out prior to the end of the month were incorrectly excluded from some 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
<b>Low</b>	<p>Controls are rated as moderate overall. OurPower have resolved the issues relating to ICPs that switched out during the month and generation consumption. The start read issue is in the process of being resolved.</p> <p>The impact is assessed to be low. The total difference between the volumes and aggregates submissions was 1,470 kWh. One ICP with distributed generation was affected for the initial allocation. Revised data will be washed up.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Most of the above have been corrected and the generation issue is being looked into	11 October 2018	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Most of the above have been corrected and the generation issue is being looked into	11 October 2018	