

Compliance plan for WISE Pre Pay Energy Limited

Title: Relevant information			
Non-compliance		Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 18-Apr-18 To: 12-Sep-18		One ICP was not updated to inactive from the correct date. One ICP had an incorrect ANZSIC code applied. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as strong, as improvements have been made during the audit period to ensure disconnections and reconnections are processed from the correct date. The registry match processes will help to identify any incorrect statuses. The incorrect ANZSIC code was chosen based on information provided with the customer application. The impact is assessed to be low, two ICPs were affected. There will be a small impact on reconciliation because consumption is not submitted during inactive periods.	
Actions taken to resolve the issue		Completion date	Remedial action status
As noted, overall the processes that we have in place are robust. We will review our training.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer above comments			

Title: Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 04-Jun-18</p> <p>To: 31-Jul-18</p>	<p>One ICP had expired interim certification when it was reconnected. The metering was replaced and fully certified within 19 days of reconnection.</p> <p>ICP 0000263650HB287's meter was unbridged on 31/05/18 but the meter was not recertified.</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, only one of the 123 reconnections did not have full certification on reconnection. One bridged meter was not recertified on unbridging.</p> <p>The impact is rated as low, the metering was replaced following reconnection.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have added a process to check metering installation certification. The process checks the certification once a day and sends the results to the person in charge. This allows us to monitor the certificate in the interim state or the expired certificate.</p> <p>For ICP 0000263650HB287, the contractor did nothing and the meter was automatically fixed.</p>		05/10/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer above comments		Date	

Title: Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: Clause 10.36 From: 05-Feb-18 To: 03-Apr-18	WISE did not have an arrangement in place with the MEP for two ICPs for part of the audit period. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, because they have prevented ICPs with an MEP WISE does not have a valid agreement or arrangement with from switching in since March 2018. The impact is low. Only two ICPs were affected and WISE promptly replaced the meter for one ICP. The other is disconnected for vacancy, so WISE does not have a customer to arrange meter replacement with.	
Actions taken to resolve the issue		Completion date
Will actively look to replace meter once site is occupied		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We only sign up customers with MEPs with valid agreement		May 2018

Title: Changes to registry information	
Non-compliance	Description
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 02-Feb-18 To: 26-Jul-18	47 late status updates. 10 late MEP nominations. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate because they are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement.</p> <p>The risk is low as most updates were completed on time or soon after they were due.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Change to Active (2,0) depends on the transfer date of losing retailer in most cases. We reconnect property but are unable to update registry until ICP is with WISE. As for MEP nominations all nominations that were late were done after MEP advised the date of replacement. The registry is updated the same day we are notified.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Weekly checks on Registry status mismatch. MEP nomination updated on same day MEP notifies WISE		Ongoing	

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: 18-Apr-18</p> <p>To: 12-Sep-18</p>	<p>One ICP had an incorrect ANZSIC code applied.</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>The controls are rated as strong, because they are sufficient to ensure that correct ANZSIC codes are applied where the information provided on the customer application is correct.</p> <p>The impact is rated as low, because only one ICP with an incorrect ANZSIC code was identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The incorrect ANZSIC code has been corrected.		08/10/18	Cleared

Preventative actions taken to ensure no further issues will occur	Completion date	
We will check the Price category code more actively to get the correct ANZSIC code	Ongoing	

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: 31-Jul-17</p> <p>To: 21-Aug-18</p>	<p>ICP 0000560119UNC95 incorrectly had the inactive status applied from 31/07/2018 to 21/08/2018.</p> <p>The registry does not reflect the correct ICP status for ICPs which have been disconnected for credit for five days or less.</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>The controls have improved and are sufficient to ensure that the registry is updated from the correct date most of the time.</p> <p>The impact is rated as low, only one ICP with incorrect status dates applied was identified.</p>	
Actions taken to resolve the issue		Completion date
As noted, overall the processes that we have in place are robust. We will review our training.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We have strong controls in place. We will monitor and review the process as required.		Ongoing

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: 07-Jun-17 To: 07-Jun-18	Incorrect AN response codes were applied for two transfer switches. 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 over AN responses are moderate. They are sufficient to ensure that the correct code is applied most of the time, but there is room for improvement. The impact is assessed as low. Information available on the registry confirmed that the two ICPs with incorrect response codes had advanced metering.		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff Training Provided		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Multiple checks before AN is sent		Ongoing	

Title: Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 01-Feb-18 To: 12-Sep-18	41 late CS files for transfer switches. One CS file contained an incorrect switch reading and last actual read date. WISE's CS process does not always ensure that the switch read reflects the actual reading on their last day of responsibility. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak, as they are unlikely to prevent incorrect CS reads from being applied in certain circumstances.</p> <p>The impact is assessed as low. The latest transfer CS was 7 days overdue, and only one incorrect reading was identified for a transfer CS.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NT and AN list is checked on daily basis and Transfer Switches are processed differently from Moving switches. As a Prepay company, if a customer switches to another company without paying a fee, we need a way to recover the loss. Our only solution is to transfer the power usage used by the customer to the gaining trader. We try to minimize the amount of usage that will be transferred to the gaining trader by disconnecting the power when the customer's balance becomes negative. This should be taken into consideration which is inevitably incurred under the current system that the daily reading is received in a day rather than in real time.</p>		Sept 2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff Training provided to follow new switching process mentioned above		Sept 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: 23-Feb-18</p> <p>To: 07-Jun-18</p>	<p>One AN had a proposed event date before the gaining trader's proposed event date.</p> <p>Incorrect AN response codes were applied for two switch moves.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls over AN responses are moderate. They are sufficient to ensure that the correct code is applied most of the time, but there is room for improvement.</p> <p>The impact is assessed as low. The switch with an early AN proposed date was switched effective from the requested date. Information available on the registry confirmed that the two ICPs with incorrect response codes had advanced metering.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff Training Provided		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff Training Provided		Ongoing	

Title: Losing trader determines a different date - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: Clause 10(2) Schedule 11.3</p> <p>From: 23-Feb-18</p> <p>To: 25-Feb-18</p>	<p>One AN had a proposed event date before the gaining trader's proposed event date.</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. WISE is aware of the AN date requirements and the non-compliant date occurred because of a data entry error.</p> <p>The impact is assessed as low. The switch with an early AN proposed date was switched effective from the requested date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff Training Provided		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Staff Training Provided		Ongoing	

Title: Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11</p> <p>Schedule 11.3</p> <p>From: 01-Feb-18</p> <p>To: 12-Sep-18</p>	<p>47 late CS files for switch moves.</p> <p>Four switch move CS files contained an incorrect switch reading and last actual read date.</p> <p>WISE's CS process does not always ensure that the switch read reflects the actual reading on their last day of responsibility.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak, as they are unlikely to prevent incorrect CS reads and late CS files under certain circumstances.</p> <p>The impact is assessed as low. The latest transfer CS was 21 days overdue, and the differences between actual and applied readings were found to be small.</p>	
Actions taken to resolve the issue		Completion date
<p>Almost all Switch Move CS files were processed within 5 working days since last audit. AN dates updating method has been changed since then.</p> <p>As a Prepay company, if a customer switches to another company without paying a fee, we need a way to recover the loss. Our only solution is to transfer the power usage used by the customer to the gaining trader. We try to minimize the amount of usage that will be transferred to the gaining trader by disconnecting the power when the customer's balance becomes negative. This should be taken into consideration which is inevitably incurred under the current system that the daily reading is received after a day rather than in real time.</p>		Feb 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Refer above comments		
		Investigating

Title: Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 15-Feb-18 To: 06-Mar-18	Four read change requests for switch moves were not supported by two actual readings. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak, as they do not ensure that all read requests are supported by at least two actual readings. The impact is low, as the read change requests were all supported by at least one actual reading. Three of the four affected read changes were rejected.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are reviewing our process to strengthen our controls		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer above comments			

Title: Withdrawal of switch requests			
Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 16-Jul-18 To 17-Jul-18	One late AW file. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because only one file was late. The impact is low because the file was one day late.		

Actions taken to resolve the issue	Completion date	Remedial action status
As noted, overall the processes that we have in place are robust. We will do our best to reach customer within time period.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Title: Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: 21 Schedule 11.3</p> <p>From: 01-Feb-18</p> <p>To: 12-Sep-18</p>	<p>Readings in five CS files were inconsistent with the AMI read for the switch date, or were not a reasonable estimate of the reading on the event date.</p> <p>Potential impact: Medium</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>Controls are rated as weak, as they are unlikely to prevent incorrect CS reads from being applied in certain circumstances.</p> <p>The impact is assessed as low overall, most CS files checked contained correct readings.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
This was human error and we will be reviewing our training.	End of October 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Title: Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 10.13, 10.24 and 15.13 From: 09-May-18 To: 13-Jun-18	Energy was not metered and quantified according to the code for two bridged meters Potential impact: Low Actual impact: Low Audit history: Once 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 mitigate risk most of the time, but there is room for improvement. Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons. The meters were bridged for 21 and 26 days respectively.		
Actions taken to resolve the issue		Completion date	Remedial action status
When the meter is bridged, add a prefix of _b {n} to the meter serial, identify it with a bridged meter, and make an estimate regardless of the actual reading. When the meter becomes unbridged, add a new meter and start from the existing reading.		14/09/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Periodically monitor the reading of the bridged meter.		Ongoing	

Title: Interrogate meters once	
Non-compliance	Description
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 19-Jun-17 To: 10-Aug-18	Three ICPs did not have an actual read recorded during the period of supply, and exceptional circumstances did not exist. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because they will mitigate the risk most of the time, and since March 2018 WISE has not accepted new ICPs without AMI metering. ICPs are likely to only be unread where they are supplied for a very short period, and AMI reads are not available.</p> <p>The impact is assessed as low, because in all cases, the ICPs were domestic customers, and the period of supply was short.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We no longer accept Non AMI sites to replace meter		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We no longer accept Non AMI sites and try and replace meter		Mar 2018	

Title: NHH meters interrogated annually			
Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Feb-18</p> <p>To: 12-Sep-18</p>	<p>The meter read frequency report considers the ICP start date with WISE, and does not allow for inactive periods.</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, there is room for errors to occur where an ICP has been inactive.</p> <p>The impact is assessed to be low, as there is no impact on reconciliation. WISE's read attainment is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Reading report procedure has been revised and no longer include inactive days.		14/09/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Check the data before submitting the reading report.		Ongoing	

Title: Correction of NHH meter readings			
Non-compliance	Description		
Audit Ref: 8.1 With: Clause 19(1) Schedule 15.2 From: 09-May-18 To: 13-Jun-18	Two bridged meters have not had corrections processed. Potential impact: Low Actual impact: Low Audit history: Twice 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 that corrections are processed most of the time, except where they relate to bridged meters. Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons.		
Actions taken to resolve the issue		Completion date	Remedial action status
When the meter is bridged, add a prefix of _b {n} to the meter serial, identify it with a bridged meter, and make an estimate regardless of the actual reading. When the meter becomes unbridged, add a new meter and start from the existing reading.		14/09/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Periodically monitor the reading of the bridged meter.		Ongoing	

Title: NHH metering information data validation	
Non-compliance	Description
Audit Ref: 9.5 With: Clause 16 Schedule 15.2 From: 01-Feb-18 To: 12-Sep-18	Where a subsequent read is lower than the switch in reading, the negative consumption is zeroed out. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate as readings are recorded correctly most of the time.</p> <p>The impact is assessed to be low. Any read differences greater than 200 kWh are expected to be dealt with through the read renegotiation process. Once reads catch up to the switch read, all consumption will be accounted for.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
If the actual reading is lower than the previous reading, the WISE will request read renegotiation if the difference exceeds 200 kW. If the difference is less than 200 kW, estimate 0 consumption until the read "catch up" the switch in read. In the case of Postpay, there is no problem to record the reading value only once a month, but 0 consumption is indispensable in Prepaid which requires daily billing.		N/A	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Refer to the comments above.			

Title: Calculation of ICP days	
Non-compliance	Description
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Feb-18</p> <p>To: 12-Sep-18</p>	<p>ICP days were not reported correctly for decommissioned ICPs.</p> <p>ICP days were under reported in August 2018 for ICP 0000560119UNC95.</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 the reports have now been corrected.</p> <p>The impact is assessed to be low. WISE is currently responsible for 30 decommissioned ICPs. The reports have been corrected, and revised ICP days will be washed up. 21 days were under reported for ICP 0000560119UNC95 due to an incorrect status date.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
The stored procedure was modified to not reflect the ICP days of the decommissioned ICP. The status date for ICP 0000560119UNC95 has been corrected.	12/09/2018	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to monitor the data values and verify the data values before submitting.	Ongoing	

Title: Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 01-Feb-18 To: 12-Sep-18</p>	<p>Incorrect ICP days were reported for decommissioned ICPs, and one ICP where the status was recorded incorrectly.</p> <p>Consumption during periods where a meter is bridged is not reported.</p> <p>Where the active period continues after a customer account is terminated, historic estimate may not include all consumption.</p> <p>When calculating historic estimate, WISE based the calculation on SASV for the network, instead of SASV for the NSP. This can result in differences for NSPs connected to HAWK and WAIK, where there is more than one balancing area per network.</p> <p>Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are rated as weak because they are unlikely to mitigate errors where the period of supply continues after the customer account is terminated.</p> <p>The controls over application of SASV and reporting of ICP days have improved to strong, following the issues being resolved.</p> <p>The impact is assessed to be low, because the ICP days and SASV issues are resolved and correct information will be washed up. The impact of the under reported consumption is low, based on the kWh differences identified.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
The stored procedure was modified to not reflect the ICP days of the decommissioned ICP, and the bridged meter was modified to estimate the reading regardless of the actual reading value by changing the meter serial number until unbridge. Also, when calculating the HE, we modified the stored procedure to use only the SASV for that NSP.	14/09/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to monitor the data values and verify the data values before submitting.	Ongoing	

Title: Historical estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.11</p> <p>With: Clause 4 and 5 Schedule 15.3</p> <p>From: 01-Feb-18</p> <p>To: 12-Sep-18</p>	<p>When calculating historic estimate, WISE based the calculation on SASV for the network, instead of SASV for the NSP. This can result in differences for NSPs connected to HAWK and WAIK, where there is more than one balancing area per network.</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>The controls are rated to be strong, because the issue was resolved during the audit.</p> <p>The impact is assessed to be low, because the data will be corrected and washed up. For all the historic estimate examples reviewed, the result using the correct NSP SASV was the same as the result using the network SASV.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
When calculating the HE, we modified the stored procedure to use only the SASV for that NSP.	12/09/2018	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to monitor the data values and verify the data values before submitting.	Ongoing	