

## Compliance plan for Globug Limited Reconciliation Participant Audit– 2023

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: 10.6,11.2 & 15.2  From: 01-Sep-21 To: 07-Sep-22	Some registry discrepancies. Some submission accuracy issues. Potential impact: Medium Actual impact: Medium Audit history: Multiple Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is assessed to be medium due to the potential kWh of under submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>Registry discrepancies:</b></p> <p>Registry updates frequency for disconnections and reconnections over 24hours will be moved to daily. This process will also be automated and is currently in development.</p> <p>We will review the current process and build improved reporting where required for both:</p> <ul style="list-style-type: none"> <li>- Disconnection and reconnection boundary readings</li> <li>- Salesforce, SAP, and registry static information for consistency.</li> </ul> <p>Report building may take some time to scope out with our developers.</p> <p><b>Submission accuracy issues:</b></p> <p>IntelliHUB has confirmed that Globug is currently set at 60 days. So, if a meter stop communicating for 59 days and starts on communicating on the 60th day data will be sent through this as replacement data.</p>	March 2023  June 2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above.	As above	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: 10.33A  From: 01-Sep-21 To: 07-Sep-22	45 ICPs reconnected without metering being certified.  Potential impact: Low  Actual impact: Low  Audit history: Three times  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as uncertified meters are replaced with AMI meters, but this can sometimes take more than five business days from reconnection to be completed.  The audit risk rating is low because although there is a higher possibility of inaccurate metering, there were only 45 ICPs affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
This non-compliance is due to our high dependency for the MEP to ensure meters are certified within five business days of reconnection. We will continue to work alongside our MEPs and provide them with regular reporting for investigations. Our confidence in this process is high with a 35% decrease in number of uncertified ICPs reconnected from last year (69 uncertified ICPs reconnected, 2021 Audit)	22 Feb 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
To mitigate any further issues arising we will continue to work alongside our MEPs to ensure timely meter certification by: <ul style="list-style-type: none"> <li>- Collating the weekly reports for meter investigations and provide feedback when necessary.</li> <li>- Reiterate avenues we can offer to MEPs in cases where customer cannot be contacted.</li> </ul>	Ongoing	

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: 10.36  From: 30-May-22 To: 30-May-22	ICP 0000650671TP122 was supplied on 30 May 2022 and there was no arrangement in place with the MEP.  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 recorded as strong because this appears to be an isolated exception. The audit risk rating is low because the ICP was supplied for one day.	
Actions taken to resolve the issue	Completion date	Remedial action status
Globug ICP checker logic now includes provisioning exceptions to prevent ICPs with no MEP arrangements from switching in.  The ICP checker logic is currently being tested by our developers, and we are expecting it to go live within the next month if testing runs smoothly.	March 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The ICP logic will be reviewed and updated when needed and more frequently.	Ongoing	

Connecting ICPs then withdrawing switch		
Non-compliance	Description	
Audit Ref: 2.14 With: 10.33A (1) (a)  From: 13-Oct-21 To: 14-Feb-22	Alleged breach 2208GBUG1 for reconnecting an ICP where Globug was not the trader, and not restoring the disconnection when the switch was withdrawn.  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. This appears to be an isolated exception but was not resolved by Globug when they were repeatedly approached by the other trader. Globug has reviewed their process and training documentation to ensure compliance for future switches where reconnection is required.	

	The impact is low. The other trader has borne the cost of re-disconnecting the ICP, consumption for the periods where Globug had reconnected the ICP before it switched out, and staff time spent following up with Globug and raising the alleged breach.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Staff training provided and process review was for frontline, Globug Operations and Switching team.	January 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Training documents have been updated and continuous coaching provided to staff.	Ongoing	

<b>Changes to registry information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.3 With: 10 Schedule 11.1  From: 01-Sep-21 To: 07-Sep-22	391 late status updates to active. 2,255 (52%) late status updates to inactive. 42 late trader updates. Three late ANZSIC code updates for new switch ins. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate overall, but the weekly processing of disconnection requests is impacting the timeliness of these updates to the registry.  The audit risk rating is assessed to be low as submission occurs regardless of the ICP status, but this will affect ICP days and line charge billing.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<b>391 late status updates to active.</b> <b>2,255 (52%) late status updates to inactive.</b>  Globug is working on new report to improve registry status updates for some time now. However, we have made progress and are now in the development stage of building this report and automating the process.	March 2023	Identified

<p>This will coincide with our plans in 2.1 – where registry updates will be daily using an automated system.</p> <p><b>42 late trader updates.</b></p> <p>We will continue to look monitor and improve our timeliness of trader updates. With a 78.35% decrease in numbers of late trader updates from last year (194 late trader updates, 2021 Audit) we are confident in our current process.</p> <p><b>Three late ANZSIC code updates for new switch ins.</b></p> <p>Staff training will be provided and a review of the current process documents to ensure that updates are done promptly.</p>	<p>Ongoing</p> <p>January 2023</p>	
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p>As above.</p>	<p>As above.</p>	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 9(1)(k) Schedule 11.1</p> <p>From: 07-Sep-22</p> <p>To: 07-Sep-22</p>	<p>18 (39.1%) of the 46 ICPs with a non-residential code were incorrect, and they were all correctly updated to residential during the audit.</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	
<p><b>Low</b></p>	<p>The controls are rated as strong overall as this is checked as ICPs join Globug. The error rate appears to be higher for non-residential ANZSIC codes, which apply to only 0.2% of active Globug ICPs.</p> <p>The audit risk rating is assessed to be low as this field is a static data table and has no direct impact on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Affected ICPs have been corrected.</p>	<p>December 2022</p>	<p>Cleared</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We will complete a Bi-yearly review on non-residential ANZSIC. Reporting will be reviewed and developed to capture non-residential ICPs. Process documents will be created and added to training documents to ensure that this process is continuous.</p>	<p>June 2023</p>	

Management of "active" status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 20-Jan-20</p> <p>To: 07-May-22</p>	<p>Six of the 15 reconnections checked had incorrect active status dates recorded 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 overall, as some errors were made when entering reconnection dates particularly for backdated updates and corrections.</p> <p>The audit risk rating is assessed to be low as submission occurs regardless of the ICP status, but this will affect ICP days and line charge billing.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>With the process change highlighted in 2.1 we are expecting less discrepancies with an automated process and an increase in frequency for registry updates.</p> <p>Process change will take effect on the 01/03/2023 and is currently in development.</p> <p>Globug will complete daily inactive status updates for all ICPs where disconnections and reconnections are not on same day.</p> <p>New process includes improved reporting and an automation of process to increase frequency from weekly to daily."</p>	March 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to monitor and review this process when required.	Ongoing	

Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9 With: 19 of schedule 11.1</p> <p>From: 01-Sep-21 To: 07-Sep-22</p>	<p>One of the 19 disconnections checked had an incorrect inactive status date recorded on the registry.</p> <p>Two disconnections had incorrect status reason codes recorded.</p> <p>Credit disconnections not updated on the registry or SAP for each full day the ICPs are inactive.</p> <p>Consumption apportioned incorrectly between consumption periods for disconnected ICPs with consumption recorded during the inactive period for 32 ICPs.</p> <p>Potential impact: Medium</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	
<b>Low</b>	<p>The controls are rated as moderate as they will mitigate risk most of the time, but the updating of statuses and credit disconnections requires some improvement.</p> <p>The audit risk is rated as low as the volumes will be submitted but may be allocated across the incorrect period.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>One of the 19 disconnections checked had an incorrect inactive status date recorded on the registry:</b></p> <p>ICP status date has been updated on the registry. This was a human error and not expected to reoccur.</p> <p><b>Two disconnections had incorrect status reason codes recorded.</b></p> <p>ICP statuses have been updated to reflect the accurate reason codes. This was a human error and not expected to reoccur.</p> <p><b>Credit disconnections not updated on the registry or SAP for each full day the ICPs are inactive.</b></p> <p>As discussed in 2.1 – disconnections will be updated daily to ensure registry and SAP are updated regularly.</p> <p><b>Consumption apportioned incorrectly between consumption periods for disconnected ICPs with consumption recorded during the inactive period for 32 ICPs.</b></p> <p>We will review our process documentation and provide training to ensure corrections are processed correctly and consumption for disconnected ICPs are captured and updated accordingly.</p>	<p>December 2022</p> <p>December 2022</p> <p>March 2023</p> <p>January 2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date
<p><b>Credit disconnections not updated on the registry or SAP for each full day the ICPs are inactive.</b></p> <p>Please refer to 2.1</p>	March 2023
<p><b>Consumption apportioned incorrectly between consumption periods for disconnected ICPs with consumption recorded during the inactive period for 32 ICPs.</b></p> <p>Refresher training will be provided to staff to ensure we are investigating inactive ICP consumption based on our 45-day reports.</p>	January 2023

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: 01-Oct-21</p> <p>To: 06-Sep-22</p>	<p>ICP 0457376273LC573 6 September 2022 had the AA (Acknowledge and accept) response code manually applied but should have had AD (advanced metering).</p> <p>ICPs 0000149152UNC36 1 October 2021, 0006515932RN302 20 January 2022, 0000800860TE024 17 February 2022 and 0000600423TU0FE 3 February 2022 had the PD (premises disconnected) response code applied based on the credit status but should have had AD (advanced metering) because they were not disconnected.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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, ANs are rarely sent manually and the automated AN process has been updated so that PD is only applied where the ICP status is disconnected.</p> <p>The audit risk rating is assessed to be low as there is a risk that a gaining trader will incur costs for those sent with the incorrect PD code when the ICP is already connected, but the number of ICPs affected is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>This is a human error and not a common occurrence.</p> <p>Training has been provided to the team and we have reiterated the importance of looking at disconnection status under the Meter Requests in Salesforce.</p>	December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	



Matrix has been created to help the team with guidance on allocating the correct code.	December 2022	
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**Losing trader must provide final information - standard switch**

Non-compliance	Description
<p>Audit Ref: 4.3</p> <p>With: Clause 5 of Schedule 11.3</p> <p>From: 17-Feb-22</p> <p>To: 24-Aug-22</p>	<p>12 CS breaches for transfer switches.</p> <p>Three WR breaches for transfer switches.</p> <p>Two T2 breaches for transfer switches.</p> <p>Three manually created transfer CS files had incorrect average daily kWh.</p> <p>Two manually created transfer CS files did not have correct CS event readings, including one 1-day supply ICP with zero consumption estimated.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating
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<b>Low</b>	<p>The controls are rated as moderate overall:</p> <ul style="list-style-type: none"> <li>some switch breach types on the switch breach history report were not being reviewed or actioned by Globug,</li> <li>there was some inaccurate CS content for manually generated CS files, and</li> <li>the process to determine switch event readings, switch event read types and average daily kWh for ICPs supplied for one day is non-compliant.</li> </ul> <p>The audit risk rating is assessed to be low as the volume of late files and incorrect information in the CS files will have a minor effect on reconciliation.</p>
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Actions taken to resolve the issue	Completion date	Remedial action status
<p>Training on ANs has been completed.</p> <p>Team aim to focus on CS training and aim to complete it by end of January 2023.</p>	December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Turndown process to be reviewed and incorporate usage while transferring the site to MEEN</p>	February 2023	

**Retailers must use same reading - standard switch**

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clauses 6(1) and 6A Schedule 11.3</p> <p>From: 29-Oct-21</p> <p>To: 27-Jul-22</p>	<p>One RR breach for a transfer switch.</p> <p>ICP 0005082536RNBB8 29 October 2021 was recorded with an estimated read type in SAP instead of actual.</p> <p>ICPs 0313702047LC2A9 28 March 2022 and 0000012648TR928 27 July 2022 were recorded with an actual read type in SAP instead of estimate.</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		
<p><b>Low</b></p>	<p>The controls are rated as moderate. RR and AC files are processed manually, and a small number of processing errors were identified. Read types intended to be estimates are sometimes defaulted to actual on entry into SAP, and there is a work around which requires users to double check read types before saving.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> <li>• the late file was processed prior to revision 14 being created for the switch event month; revised submission data will be washed up, and</li> <li>• actual and estimated switch event readings are treated as permanent by the historic estimate process; incorrect classification of switch event readings does not affect submission accuracy.</li> </ul>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Globug has assessed these as being human error rather than a technical or system issue. Refresher training has been provided to minimise the likelihood of recurrence</p>		<p>January 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.</p>		<p>Ongoing</p>	

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: 20-Sep-21</p> <p>To: 19-Sep-22</p>	<p>Eight E2 breaches.</p> <p>124 T2 breaches.</p> <p>Nine WR breaches.</p> <p>ICPs 1002143120LCC87 17 March 2022, 0328203033LC30D 5 September 2022, 1002056840LC1D3 18 February 2022 and 0583861776LCA76 3 March 2022 had the PD (premises disconnected) response code applied based on the credit status but should have had AD (advanced metering) because they were not disconnected.</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 overall:</p> <ul style="list-style-type: none"> <li>• some switch breach types on the switch breach history report were not being reviewed or actioned by Globug,</li> <li>• ANs are rarely sent manually, and errors occur more frequently for manually created files, and</li> <li>• the automated AN process has been updated so that PD is only applied where the ICP status is disconnected.</li> </ul> <p>The audit risk rating is assessed to be low as there is a risk that a gaining trader will incur costs for those sent with the incorrect PD code when the ICP is already connected but the number of ICPs affected is low. The late files are expected to have a minor impact on other traders and customers.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As noted, Globug will begin to run a second switch breach history report each day which includes the switch breach types which were not being monitored. Training has been provided to ensure NT proposed transfer date and actual transfer date matches the CS file date. It has been reiterated to check the date when manually updating the info.		January 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.		Ongoing	
Losing trader provision of final information			
Non-compliance	Description		

<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 18-Sep-21</p> <p>To: 30-Aug-22</p>	<p>One manually created switch move CS had an incorrect read type.</p> <p>Six manually created switch move CS files contained incorrect switch event reads, including four 1-day supply ICPs with zero consumption estimated and one 1-day supply ICP where negative consumption was estimated.</p> <p>One manually created switch move CS had an incorrect last actual read date.</p> <p>Six manually created switch move CS files had incorrect average daily kWh.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>Low</b></p>	<p>The controls are rated as moderate overall:</p> <ul style="list-style-type: none"> <li>• some switch breach types on the switch breach history report were not being reviewed or actioned by Globug,</li> <li>• there was some inaccurate CS content for manually generated CS files, and</li> <li>• the process to determine switch event readings, switch event read types and average daily kWh for ICPs supplied for one day is non-compliant.</li> </ul> <p>The audit risk rating is assessed to be low as the volume of late files and incorrect information in the CS files will have a minor effect on reconciliation. Five of the switches containing incorrect information were later withdrawn.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Training has been provided to ensure Read Type is assessed with caution.</p>	<p>January 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.</p>	<p>Ongoing</p>	

Gaining trader changes to switch meter reading - switch move.		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>From: 28-Jan-22</p> <p>To: 12-Sep-22</p>	<p>ICPs 0000741472TUAEA 31 August 2022 and 1002080286LC428 24 August 2022 were recorded with an actual read type in SAP instead of estimate.</p> <p>ICPs 0000022439WED82 24 May 2022 and 0430927037LCBBC 5 March 2022 did not have the agreed switch reading recorded in SAP resulting in combined over submission of 1,051 kWh.</p> <p>ICP 0000609928UN569 10 December 2021 had an RR issued for an incorrect time slice which was rejected by the other trader.</p> <p>The RR for ICP 0000002574CP867 3 August 2022 was only supported by one validated actual reading.</p> <p>14 RR breaches for switch moves.</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 rated as moderate. RR and AC files are processed manually, and a small number of processing errors were identified. Read types intended to be estimates are sometimes defaulted to actual on entry into SAP, and there is a work around which requires users to double check read types before saving.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> <li>all late files were processed prior to revision 14 being created for the switch event month; revised submission data will be washed up,</li> <li>actual and estimated switch event readings are treated as permanent by the historic estimate process; incorrect classification of switch event readings does not affect submission accuracy,</li> <li>the incorrect agreed switch readings recorded in SAP resulted in over submission of 1,051 kWh; revised submission data will be washed up if these readings are corrected, and</li> <li>only one RR not supported by two actual readings was identified.</li> </ul>	
Actions taken to resolve the issue	Completion date	Remedial action status
Training has been provided to the team on double checking the read type entered as. Also, will take this up with Readings Management to check if there is any process at their end that could update the Read Type.	January 2023	Identified

<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>
Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.	Ongoing

<b>Withdrawal of switch requests</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.15 With: Clause 17 of Schedule 11.3  From: 17-Nov-21 To: 31-Aug-22	Four of the 21 NW files sampled had an incorrect NW code. 18 NA breaches. Two SR breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate as the controls will mitigate risk most of the time. Controls will improve once all breach types on the switch breach history report are reviewed and actioned.  The impact is low because most NW and AW files were sent on time and had accurate content.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Globug has assessed these as being human error rather than a technical or system issue. Refresher training has been provided to minimise the likelihood of recurrence.	January 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.	Ongoing	

Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: Clause 21 of Schedule 11.3</p> <p>From: 05-Mar-22</p> <p>To: 24-May-22</p>	<p>Eight CS files contained event readings which did not reflect the actual reading or best estimate of actual consumption at the end of the last day of supply.</p> <p>22 ICPs supplied for one day switched out with the same reading they switched in on, and the switch event reading did not reflect the best estimate of actual consumption at the end of the last day of supply.</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	
<b>Low</b>	<p>The controls are rated as moderate overall:</p> <ul style="list-style-type: none"> <li>there was some inaccurate CS content for manually generated CS files, and</li> <li>the process to determine switch event readings, switch event read types and average daily kWh for ICPs supplied for one day is non-compliant.</li> </ul> <p>The audit risk rating is assessed to be low as the incorrect information in the CS files will have a minor effect on reconciliation, where the switches were not withdrawn.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Globug has assessed these as being human error rather than a technical or system issue. Refresher training has been provided to minimise the likelihood of recurrence.	January 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.	Ongoing	

Electricity conveyed		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 01-Sep-21</p> <p>To: 30-Sep-22</p>	<p>Five ICPs with distributed generation present but export metering is not present. Energy is not metered and quantified according to the code where meters are bridged.</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 moderate as they will mitigate risk most of the time but there is room for improvement.</p> <p>The volume of ICPs with distributed generation and bridged meters is small therefore the audit risk rating is low. The ICPs with distributed generation have now switched out.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>All five ICPs have all been switched out.</p> <p>Our ICP checker logic now includes provisioning exceptions for ICPs with installation type B or G and no I flow metering.</p> <p>The ICP checker logic is currently being tested by our developers, and we are expecting it to go live within the next month if testing runs smoothly.</p>	<p>December 2022</p> <p>March 2023</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ICP checker logic and exceptions will be monitored frequently by the team to pick up any discrepancies.	Ongoing	



Collection of information by certified reconciliation participant			
Non-compliance		Description	
Audit Ref: 6.5 With: Clause 2 Schedule 15.2  From: 01-Sep-21 To: 30-Sep-22		Time correction of 3.28 days for ICP 0030102179PCE39 was not reviewed or raw meter data assessed to determine if any correction was required.  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 moderate as while the time difference reports published by the AMI MEPs are not reviewed by Globug to enable an assessment of the impacts of any time corrections on the raw meter data, Globug are alerted to specific ICP time difference issues via email from the respective MEP however it is unknown whether all material time corrections are notified by the AMI MEPs.  The audit risk rating is low as the number of affected meters is small and the affected ICPs are metering installation category 1 so the affected volumes are quite small.	
Actions taken to resolve the issue		Completion date	Remedial action status
This non-compliance is controlled by the MEP. Feedback has been provided accordingly. Read data is provided by IntelliHUB and AMS. Globug does not collect data as a certified reconciliation participant.		January 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will add time corrections to our discussion points during monthly meetings with MEPs. This way we can be more proactive in capturing and errors that may arise.		Ongoing	

NHH meter reading application	
Non-compliance	Description
Audit Ref: 6.7 With: Clause 6 Schedule 15.2  From: 01-Sep-21 To: 30-Sep-22	Two transfer switches sent with the incorrect read.  Five switch move ICPs sent with incorrect estimated reads.  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>	<p>The controls are rated as moderate. The error found related to manually released CS files.</p> <p>The audit risk rating is assessed to be low as there were only a small number of CS files sent with the incorrect last read and this will have a minor effect on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Globug has assessed these as being human error rather than a technical or system issue. Refresher training has been provided to minimise the likelihood of recurrence.</p>		January 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.</p>		Ongoing	

Interrogate meters once			
<p>Audit Ref: 6.8 With: 7(1) &amp; (2) of schedule 15.2  From: 01-Sep-21 To: 30-Sep-22</p>	<p>Exceptional circumstances not proven for ICP 0300620020LC732 not read during period of supply.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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 Globug use AMI meters, and if an AMI meter cannot be installed these ICPs are switched away.</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	Remedial action status
<p>From time-to-time Globug may expect a period of short supply where metering installation cannot be read so ICP is required to be switched-out. Under these circumstances our process is to use the average daily consumption received in the CS file is used for estimating the volume for the intervening period. With a 98.59% decrease in ICPs found with exceptional circumstances not read during period of supply from last audit (71 ICPs found, in 2021 audit) we are confident that our process is working.</p>		NA	Identified

<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>
As above.	As above.

<b>NHH meters interrogated annually</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.9 With: 8(1) & (2) of schedule 15.2  From: 01-Sep-21 To: 30-Sep-22	Exceptional circumstances not proven for four ICPs not read in the past 12 months.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong as they will mitigate risk most of the time but there is room for improvement.  The audit risk rating is low as the volume of ICPs affected by this is small.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Site visits have now been raised for these ICPs. The four missing ICPs were down to human error. We are currently working on reporting improvements to mitigate the likeness of this error recurring.	May 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Process and reporting improvements were started last year however there was a lapse due to role changes. We will pick this back-up and ensure that it is within the timeframe provided.	May 2023	

<b>NHH meters 90% read rate</b>			
<b>Non-compliance</b>		<b>Description</b>	
Audit Ref: 6.10 With: 9(1) and (2) Schedule 15.2  From: 01-Sep-21 To: 30-Sep-22		Exception circumstances did not apply, and the best endeavours requirement was not met for 51 ICPs.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2	
<b>Audit risk rating</b>		<b>Rationale for audit risk rating</b>	
<b>Low</b>		The controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement.  The audit risk rating is low as the volume of ICPs affected by this is small as all ICPs are metering installation category 1 and residential.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Once an investigation to resolve meter communication issues exceeds four months we will promptly transition the ICP to an alternative retailer. This will be monitored through reporting and training documents will be updated to reflect actions below to prevent further occurrence of the non-compliance.		June 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
The process will be refined so that these ICPs can be identified within the third month of investigations and based on the service request information we will start to switch the ICP over to alternative retailer.		June 2023	

<b>Identification of readings</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2  From: 01-Sep-21 To: 30-Sep-22	Ten CS files contained incorrect read types. Two ICPs did not have the correct switch read type recorded in SAP.  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>	<p>The controls are rated as moderate. The errors found related to manually released CS files.</p> <p>The audit risk rating is assessed to be low. Actual and estimated switch event readings are treated as permanent by the historic estimate process. Incorrect classification of switch event readings does not affect submission accuracy. Incorrect classification of estimated reads as actual in CS files can affect other traders' ability to issue read renegotiations under Clause 6 (2) and (3) Schedule 11.3 where they intend to settle the ICP as HHR.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Training has been provided to the team on double checking the read type entered as.		January 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Regular internal audits will help in minimising errors and recognising whether there are any improvements required for compliance.		Ongoing	

Meter data used to derive volume information			
Non-compliance	Description		
<p>Audit Ref: 9.3 With: Clause 3(5) Schedule 15.2</p> <p>From: 01-Sep-21 To: 30-Sep-22</p>	<p>Raw meter data is rounded upon receipt and not when volume information is created for IntelliHUB meters.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 and will mitigate risk to an acceptable level but there is room for improvement.</p> <p>There is very little impact because no metered consumption information is “missing”, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A ticket was raised but due to the low priority has not progressed at this stage, it is on our radar to review and follow up.		June 2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

As above.	NA	
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<b>Electricity supplied information provision to the reconciliation manager</b>			
<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 11.3 With: Clause 15.7  From: 01-Sep-21 To: 30-Sep-22	Unmetered load volumes for four ICPs not included in electricity supplied report. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are recorded as moderate because while all billed volume is included in this file, no consideration was made to include unmetered loads that has been supplied but not invoiced.  The impact on settlement and participants is minor therefore, the audit risk rating is low.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
We disagree with the comments regarding the impact on settlement and other participants as from our point of view the impact is nil as all the volumes for the unmetered are captured and reported in our NHH submission file. The unmetered load is not captured as part of the AV080 "As Billed" as we do not bill our customers for the unmetered load. A Service Request has been created to make the required change to ensure the As Billed file is correct.		June 2023	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
A Service Request has been created to make the required change to ensure the As Billed file is correct.		June 2023	

<b>Creation of submission information</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 12.2 With: Clause 15.4	Generation information not submitted for five ICPs with distributed generation present.  Consumption information was not submitted for at least 22 ICPs which were supplied for one day before switching to an alternative trader.  Potential impact: Low Actual impact: Low Audit history: Twice

From: 01-Sep-21 To: 30-Sep-22	Controls: Moderate Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  The impact on settlement and participants is minor therefore, the audit risk rating is low.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p><b>Generation information not submitted for five ICPs with distributed generation present:</b></p> <p>ICPs are no longer with Globug as highlighted in 6.1.</p> <p><b>Consumption information was not submitted for at least 22 ICPs which were supplied for one day before switching to an alternative trader:</b></p> <p>Where Globug cannot supply an ICP due to metering issues, we work to switch the ICP out immediately. In most cases the ICP is with Globug for only one day. Ideally in these cases the Globug trader time slice would be removed entirely however this would cause further delay and create additional work for participants. We believe our current process has minimal impact on the market and other participants.</p> <p>We have followed the same process and have not made any changes.</p>		December 2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Once ICP checker is updated with new logic - ICP checker logic and exceptions will be monitored frequently by the team to pick up any discrepancies.		Ongoing	

<b>Accuracy of submission information</b>	
<b>Non-compliance</b>	<b>Description</b>
z	<p>Inaccurate submission as follows:</p> <ul style="list-style-type: none"> <li>• five CS files contained inaccurate CS event readings resulting in under or over submission,</li> <li>• two ICPs did not have the agreed switch reading recorded in SAP, leading to incorrect submission information,</li> <li>• consumption apportioned incorrectly between consumption periods for disconnected ICP 0000010975HR5B6 with consumption recorded during the inactive period,</li> <li>• Intellihub does not provide raw meter data to replace estimates for periods greater than 15 days; the quantity of estimates remaining is unknown,</li> </ul>

	<ul style="list-style-type: none"> <li>Electricity Supplied report does not include unmetered load volumes, and</li> <li>generation information not submitted for five ICPs with distributed generation present.</li> </ul> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate overall but there is room for improvement. The audit risk rating is assessed to be low due to the small amount of under submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>Five CS files contained inaccurate CS event readings resulting in under or over submission,</b></p> <p><b>Two ICPs did not have the agreed switch reading recorded in SAP, leading to incorrect submission information:</b></p> <p>Focused training to be provided to ensure content in the CS file are covered thoroughly.</p> <p><b>Consumption apportioned incorrectly between consumption periods for disconnected ICP 0000010975HR5B6 with consumption recorded during the inactive period:</b></p> <p>As highlighted in 3.9 - We will be reviewing our process documentation and providing training to staff to ensure consumption is accurately captured and processed correctly for disconnected ICPs.</p> <p><b>IntelliHUB does not provide raw meter data to replace estimates for periods greater than 15 days; the quantity of estimates remaining is unknown:</b></p> <p>Raw meter data is provided from IntelliHUB up to 60 days.</p> <p><b>Electricity Supplied report does not include unmetered load volume:</b></p> <p>Please refer to comments on 11.3.</p> <p><b>Generation information not submitted for five ICPs with distributed generation present:</b></p> <p>ICPs are no longer with Globug and have been switched over to alternative retailers.</p>	<p>January 2023</p> <p>January 2023</p> <p>January 2023</p> <p>June 2023</p> <p>December 2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	



<p><b>Five CS files contained inaccurate CS event readings resulting in under or over submission,</b></p> <p><b>Two ICPs did not have the agreed switch reading recorded in SAP, leading to incorrect submission information:</b></p> <p>Regular internal audit will help minimising the error and recognise if there are any more improvements to be compliant.</p> <p><b>Electricity Supplied report does not include unmetered load volume:</b></p> <p>Please refer to comments on 11.3.</p> <p><b>Generation information not submitted for five ICPs with distributed generation present:</b></p> <p>With the ICP check logic updates highlighted in 6.1 – we do not anticipate taking on any ICPs that generate or distribute moving forward.</p>	<p>Ongoing</p>   <p>June 2023</p>   <p>March 2023</p>	
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<b>Permanence of meter readings for reconciliation</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 12.8</p> <p>With: 4 of schedule 15.2</p>    <p>From: 01-Sep-21</p> <p>To: 30-Sep-22</p>	<p>Permanent estimates applied when exceptional circumstances not proven for ten ICPs not read in the past eight months.</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>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as strong overall and will mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as the volume of ICPs affected by this is small.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p>We have reviewed our current processes for permanent estimates and have confirmed that they are strong.</p>	January 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>As mentioned in our comments for 6.9 and 6.10, we have implemented processes to help reduce the risk of ICPs not being read and ensure we are making reasonable endeavours. Overall we have increased our focus on this issue.</p>	June 2023	

Historical estimate process			
Non-compliance		Description	
Audit Ref: 12.11 With: Clauses 4 and 5 Schedule 15.3  From: 01-Sep-21 To: 30-Sep-22		Historic estimate calculation incorrect for scenario L (Network/GXP/Connection (POC) alters part way through a month.  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 recorded as moderate because for scenario L the incidence is also low, and the affected volumes are small.	
Actions taken to resolve the issue		Completion date	Remedial action status
From our point of view the impact is virtually nil as the only difference is due to rounding.		NA	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above.	

Forward estimate process			
Non-compliance		Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3  From: 01-Sep-21 To: 30-Sep-22		Submission accuracy not met for all consumption periods.  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 recorded as moderate because some erroneous data was included in the submission process resulting in submissions accuracy not being met.  The impact is considered low as revisions did improve the overall accuracy of these submissions.	
Actions taken to resolve the issue		Completion date	Remedial action status

As noted, for the four examples reviewed where the difference to the initial submission exceeded 15% and volume impact exceeded 25,000 kWh, the inaccuracies were caused by the delay in reprogramming meters (two registers reprogrammed to one register). We are currently investigating why this has occurred and will take appropriate action to ensure this is not recurring going forward.	March 2023	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above.	As above.	

<b>Historical estimate reporting to RM</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 13.3 With: Clause 10 Schedule 15.3  From: 01-Jan-22 To: 31-Mar-22	The revision three historic estimate thresholds were not met for January 2022 to March 2022.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement.  The audit risk rating is low as the volume of ICPs affected by this is small as all ICPs are metering installation category 1 and residential.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We consider our current processes to be strong. Due to Globug having a relatively small number of ICPs on some GXPs, a single ICP being estimated can have a disproportionate effect on Globug's HE percentage figures. The effect is mitigated by the fact that historic estimate is 100% from the 7-month revision on and this also indicates that overall our processes are strong.	January 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above.	As above.	