

Compliance plan for Ecotricity Limited Partnership 2023

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Mar-22</p> <p>To: 30-Sep-22</p>	<p>Some registry discrepancies exist.</p> <p>Several scenarios leading to incorrect submission information.</p> <p>Inaccurate HHR data where ARC is the MEP due to having only one decimal place.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as moderate at the time of the audit because the validation reporting is largely robust however submission issues identified are taking longer to resolve due to resource constraints.</p> <p>The impact is assessed to be high because the kWh volumes missing from submissions are large.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Many of the non-compliance points raised in this audit and the actions we plan to take will help resolve registry discrepancies and incorrect submission information.</p> <p>We are unable to prevent ARC from supplying data to one decimal place though will discuss with them</p>	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Many of the non-compliance points raised in this audit and the actions we plan to take will help resolve registry discrepancies and incorrect submission information.</p> <p>We are unable to prevent ARC from supplying data to one decimal place though will discuss with them</p>	31/01/2024	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 01-Mar-22 To: 30-Sep-22	ICP's 0000228889UN9E5 and 0005783615RND85 were not certified within five business days of reconnection. 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 recorded as weak because there isn't a process in place to request certification to occur. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Currently working to recertify the meters.	31/03/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A report has been developed within eSales for the Team to use. In addition, a process will be implemented for the Customer Service Team to advise Metering if a meter needs recertifying upon reconnection.	31/01/2024	

Arrangements for line function services		
Non-compliance	Description	
Audit Ref: 2.12 With: Clause 11.16 From: 01-Mar-22 To: 30-Sep-22	Line function service agreements not in place for three embedded networks. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because there is not a process in place to ensure switching does not commence for a network where Ecotricity does not have an agreement for line function services. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Since the audit we have contacted the embedded networks to gain the agreements and are now waiting on their responses.	End of December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Create a report that shows all the networks we supply to vs a list of networks that we have agreements with.	30/06/2023	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Mar-22</p> <p>To: 30-Sep-22</p>	<p>40 late updates to active status.</p> <p>24 late updates to inactive status.</p> <p>696 late trader updates including seven late ANZSIC code updates.</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 are recorded as moderate. There is now a process to validate robotron*esales against a list file with history and other validation reports are being used.</p> <p>The impact on settlement and participants is minor, as while 98% (63 out of 64) late active updates were for either HHR submitted ICPs or for trader specific profiles and the late updates to active has impacted the Reconciliation Managers calculation of seasonal shapes for all NHH retailers, the overall number is small therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Validation reporting is in place to help identify and update the ICPs.		30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be hiring more CS staff; this will lessen the overall load, prevent human errors made in haste and get all work checked before breaching. We have also started creating activities to update the registry, rather than relying on an email chain to track.		30/06/2023	

Provision of information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 01-Mar-22 To: 30-Sep-22	38 late status updates to active for new connections. 14 ICPs initially had incorrect active status event dates. 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 are recorded as moderate because they mitigate risk most of the time but there is room for improvement in terms of working with the MEPs and field service providers in improving paperwork delivery timeliness. The impact on settlement and participants is low, as while 71% (27 out of 38) late active updates were for HHR submitted ICPs and the late updates to active could have impacted the Reconciliation Managers calculation of seasonal shapes for all NHH retailers, only six updates were for more than 30 days meaning they did not influence the seasonal shape calculation, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will have a conversation with the relevant MEP/s regarding timeliness of delivering paperwork.	30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Will be setting up the conversations with relevant MEP/s.	30/06/2023	

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 01-Mar-22 To: 30-Sep-22	At least 13 incorrect ANZSIC codes. 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 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.	
Actions taken to resolve the issue	Completion date	Remedial action status
Since the audit, we believe we have fixed the codes.	End of December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Implement a more robust process to check ANZSIC codes against the registry and update more frequently.	31/01/2024	

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7 With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>15 ICPs with incorrect daily average kWh calculated and applied where the volume impact was calculated as 24,901 kWh pa.</p> <p>Two ICPs (0001351650PCA57, 0005808588RN085) where the unmetered load flag is yes, but the daily unmetered kWh is incorrectly recorded as zero.</p> <p>ICP (0282046071LCEB5) where the trader's daily unmetered kWh is different by more than ± 0.1 kWh from a calculation based on the distributor's unmetered load details.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as weak because the process to gain new unmetered loads does not include a step to validate the unmetered load details present on the registry including the Distributor UNM details field and also the Daily kWh field.</p> <p>The impact on settlement and participants is moderate; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Some of the daily kwh amount was corrected in the Registry and sync'd through to esales. Since the audit we have contacted the networks to get the correct amount.	End of December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A report has been created within eSales to monitor discrepancies of UML ICPs. We will implement a process to check and correct and errors.	31/01/2024	

Management of "active" status		
Non-compliance	Description	
Audit Ref: 3.8 With: Clause 11.18 From: 01-Mar-22 To: 30-Sep-22	14 ICPs initially had incorrect active status event dates. Two reconnected ICPs had incorrect active status dates. Potential impact: High Actual impact: High Audit history: None Controls: Moderate Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	Controls are rated as moderate, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed. The impact is high as seven of these ICPs are showing in the inactive consumption report with a HHR volume impact of 500,000 kWh allocated to a single NSP. This initial HHR under submission will have impacted the Reconciliation Managers calculation of seasonal shapes for all NHH retailers for the affected consumption periods.	
Actions taken to resolve the issue	Completion date	Remedial action status
Since the audit we have reversed any incorrect status updates and added the correct update	End December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will add a process to create activities when sending a Reconnection. We have also reiterated to Teams to "Double check all data before pressing UPDATE on the registry".	30/06/2023	

Management of “inactive” status		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 01-Mar-22 To: 30-Sep-22	15 ICPs with consumption recorded during inactive periods resulting in under submission of 546,006 kWh. One ICP (0000680226WTA92) with incorrect inactive status reason code. Potential impact: High Actual impact: High Audit history: Once Controls: Moderate Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	Controls are rated as moderate overall. Most disconnection information checked was processed accurately, but there is room for improvement. The impact on settlement and participants is high; therefore, the audit risk rating is high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Since the audit we have reversed any incorrect status updates and added the correct update	End of December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have a report that shows the inactive ICPs with consumption that we will begin checking monthly and create activities when sending a Reconnection/Disconnections to make sure none of these are missed by human error.	30/06/2023	

Inform registry of switch request for ICPs - standard switch		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 Schedule 11.3 From: 01-Mar-22 To: 30-Sep-22	NT files sent late after preconditions were met for three ICPs. 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 recorded as strong as the processes to ensure preconditions are met are robust and the issues identified were due to a system issue. The impact was low due to small number of affected NT files until the system issue was resolved.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue improvement and monitoring of the system.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue improvement and monitoring of the system.	31/01/2024	

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: 01-Mar-22 To: 30-Sep-22	17 ICPs had the AA (acknowledge and accept) response code applied but should have had AD (advanced metering). Five AN breaches for late AN files relating to standard switches. 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 recorded as strong, the volume of late or ANs with incorrect response codes is small compared to the number of ANs issued. The audit risk rating is assessed to be low as the late files were no more than three business days late and there is very little risk that a gaining trader will incur any costs for those ICPs sent with the incorrect response code.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue improvement and monitoring of the system.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue improvement and monitoring of the system.	31/01/2024	

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: 01-Mar-22</p> <p>To: 30-Sep-22</p>	<p>16 CS breaches for late delivery of a CS file.</p> <p>Four of a sample of seven manually created standard switch CS files had an incorrect read type.</p> <p>One from a sample of seven manually created standard switch CS files contained incorrect switch event reads.</p> <p>Two from a sample of seven manually created standard switch CS files had an incorrect last actual read date.</p> <p>Two CS files (ICPs 0000957903TU1CD, 0000512586CE540) had an incorrect average daily kWh value calculated.</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 are recorded as moderate because there is no mechanism to ensure:</p> <ul style="list-style-type: none"> for HHR settled ICPs that the switch read aligns with the HHR consumption volumes submitted up to the switch date, and switch reads used do not relate to the Ecotricity period of responsibility. There is an impact on settlement and participants as this generates an additional volume of RR changes where other traders are able to detect these invalid switch reads, and it also increases UFE. The total number of ICPs and the total kWh is not large, therefore the risk rating is low. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue improvement and monitoring of the system. We will also make improvements for the controls around any manually processed CS files.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue improvement and monitoring of the system. We will also make improvements for the controls around any manually processed CS files.	31/01/2024	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>Incorrect readings used for five ICPs sampled where Ecotricity settle as HHR, the CS read was estimated, and no read request change was sent to ensure the transfer read is accurate across the change of trader and submission types.</p> <p>Incorrect readings used for four ICPs where the ICP is settled as HHR, and the RR was rejected by the losing trader but used by Ecotricity.</p> <p>One RR file sent more than four months after the CS transfer date.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because as the gaining trader, Ecotricity needs to ensure no volume is lost during the switch process where there is a change in submission type.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
RR processes will be reviewed. We will be creating a data base for all calculated RRs so that there is an audit trail. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		30/06/2023
Preventative actions taken to ensure no further issues will occur		Completion date
RR processes will be reviewed. We will be creating a data base for all calculated RRs so that there is an audit trail. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		30/06/2023
Remedial action status		
Identified		

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 01-Mar-22 To: 30-Sep-22	NT files sent late after preconditions were met for three ICPs. 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 strong because NT files are usually issued on time, the exception occurred because an NT was not reissued after a withdrawal was completed. There is a minor impact on the customer, and other trader. The switch was completed in time for revised submission information to be provided through the wash up process.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue improvement and monitoring of the system.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue improvement and monitoring of the system.	31/01/2024	

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>Seven ICPs with an incorrect response code of AA (acknowledge and accept) where a communicating AMI meter was present, and the AD (advanced metering) response code should have been applied.</p> <p>Six ICPs were disconnected at the time of receipt of the NT file and did not have the response code applied of PD (premise disconnected) provided in the AN file.</p> <p>ICP 0009904229LNF74 had a metering event indicating the AMI meter was not communicating at the time of the NT file and a response code of AD (advanced meter) was incorrectly applied.</p> <p>Eight AN breaches for late AN files relating to switch moves.</p> <p>Three CS breaches.</p> <p>27 T2 breaches for switch moves.</p> <p>Eight E2 breaches where the NT proposed transfer date and actual transfer date did not match, and the CS event date was earlier than the gaining trader's proposed event date.</p> <p>Two WR breaches where the AN and/or CS is delivered more than two business days after AW rejection.</p> <p>Three ET breaches for switch moves.</p> <p>Potential impact: Low Actual impact: Low Audit history: twice Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk to an acceptable level most of the time. However resourcing levels, personnel changes, and key personnel due annual leave, means the processes as are not as robust as they consistently need to be.</p> <p>The impact on other participants was minor because the files were only late by one or two days. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.	30/06/2023	
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Losing trader must provide final information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.10 With: Clause 11 Schedule 11.3</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>Two of a sample of three manually created switch move CS files had an incorrect read type.</p> <p>Four of a sample of five manually created switch move CS files contained incorrect switch event reads.</p> <p>Two of a sample of five manually created switch move CS files had an incorrect last actual read date.</p> <p>Four of a sample of ten manually created CS files (ICP 0086327200WRAE1, 0000202927DEEE7, 0000602030HB136, and 0006516084RNBD6) had incorrect average daily kWh value calculated.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because there is no mechanism to ensure:</p> <ul style="list-style-type: none"> for HHR settled ICPs that the switch read aligns with the HHR consumption volumes submitted up to the switch date, and switch read used must always relate to the Ecotricity period of responsibility. There is an impact on settlement and participants as this generates an additional volume of RR changes where other traders are able to detect these invalid switch reads, and it also increases UFE. The total number of ICPs and the total kWh is not large, therefore the risk rating is low. 		
Actions taken to resolve the issue		Completion date	Remedial action status
We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.		30/06/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.		30/06/2023	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11 With: Clause 12 Schedule 11.3</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>Incorrect readings used for five ICPs sampled where Ecotricity settle as HHR, the CS read was estimated, and no read request change was sent to ensure the transfer read is accurate across the change of trader and submission types.</p> <p>Incorrect readings used for four ICPs where the ICP is settled as HHR, and the RR was rejected by the losing trader but used by Ecotricity.</p> <p>Incorrect readings used for one ICP where the ICP is settled as NHH, and the RR was rejected by the losing trader but used by Ecotricity.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because as the gaining trader, Ecotricity needs to ensure no volume is lost during the switch process where there is a change in trader.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Activities are now being created for all future RR's and will be closed off once the read is showing as the opening read.	31/01/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Activities are now being created for all future RR's and will be closed off once the read is showing as the opening read.	31/01/2023	

Gaining trader to advise the registry manager - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.14 With: Clause 16 Schedule 11.3 From: 01-Mar-22 To: 30-Sep-22	One late HH CS 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	The controls are recorded as strong as processes are robust around monitoring HH switches. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Nothing can be done to resolve the historic late HH CS file however, eSales now sends HH files meaning there is no longer manual intervention to help ensure files are processed within timeframes	End of December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
eSales now sends HH files meaning there is no longer manual intervention to help ensure files are processed within timeframes.	End of December 2022	

Withdrawal of switch requests			
Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 01-Mar-22 To: 30-Sep-22	Five NA breaches. Four NW breaches. Four AW breaches. Two SR breaches. 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	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Nothing can be done to resolve the historic breaches, however, we will be hiring more staff which will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.		End of December 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	Identified
We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste and ensure all work is checked/completed before breaching.		30/06/2023	

Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16 With: Clause 21 of Schedule 11.3</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>Three 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>The reading provided in the CS file for HHR settled ICPs did not always align with the interval data volumes where the reading has been estimated for the CS file.</p> <p>Ecotricity did not use the provided CS read for five ICPs where the RR file was rejected by the losing trader.</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate overall as most switch event readings reflected the actual reading or best estimate for the last day of supply.</p> <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 or where a read request change is not undertaken.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We are in the process of improving our system which should remove the human error found in the manually created CS files.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are in the process of improving our system which should remove the human error found in the manually created CS files.	31/01/2024	

Maintaining shared unmetered load		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 11.14 From: 01-Mar-22 To: 30-Sep-22	Two ICPs (0001351650PCA57, 0005808588RN085) where the daily unmetered kWh value is incorrectly recorded as zero. Potential impact: Low Actual impact: Low Audit history: none Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because the process to gain new unmetered loads does not include a step to validate the unmetered load details present on the registry including the Distributor UNM details field and the Daily kWh field. The impact on settlement and participants is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Since the audit we have gone through and updated the daily unmetered kWh.	31/01/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A report has been created within eSales to monitor discrepancies of UML ICPs. We will implement a process to check and correct and errors.	31/01/2024	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13, Clause 10.24 and 15.13 From: 01-Mar-22 To: 30-Sep-22	Submission had not occurred for 21 HHR ICPs and 72 NHH ICPs with distributed generation and the RM was not notified of gifting. For one ICP (0005380049ALD95) the meter was bridged during the audit period meaning volumes were not quantified in accordance with the code. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because although sound reporting is in place, resource constraints mean discrepancies are not resolved as soon as possible. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Reporting is in place to support identifying and resolving issues with distributed generation not being submitted. A process needs to be created for this.	30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reporting is in place to support identifying and resolving issues with distributed generation not being submitted. A process needs to be created for this.	30/06/2023	

Collection of information by certified reconciliation participant		
Non-compliance	Description	
Audit Ref: 6.5 With: Clause 2 Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	23 ICPs not interrogated within the maximum interrogation cycle. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate as while the system can perform reasonable estimations using historical consumption data as a reference, after four months the estimation accuracy declines and there is no ability to ensure the volume estimated relates to actual consumption consumed at the ICP. The audit risk rating is low as the number of affected meters is small and the affected ICPs are metering installation capacity 1 so the affected volumes are quite small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Ecotricity to review and develop a process to identify and investigate issues within the maximum interrogation cycle.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ecotricity to review and develop a process to identify and investigate issues within the maximum interrogation cycle.	31/01/2024	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	One standard switch ICP sent with incorrect read for the transfer date. Four switch move ICPs sent with incorrect reads for the transfer date. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. The errors found related to manually created CS files. 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.	
Actions taken to resolve the issue	Completion date	Remedial action status
Any brought to our attention during the audit have been resolved.	End of December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are in the process of improving our system which should remove the human error found in the manually created CS files.	31/01/2024	

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	Best endeavours not met for six ICPs not read in the 12-month period ending 31 August 2022. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Reporting is in place but this does not cover the full NHH submission population and it is also not being actioned consistently, therefore the controls are weak. The impact on settlement and participants is minor based on the incomplete reporting currently available to assess the impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have contacted the customers involved to organise readings.	End December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
With new staff onboard, we will begin more frequent checks and more intensive follow up with customers to organise readings	30/06/2023	

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	Eight ICPs not read in the 4-month period up to August 2022. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Reporting is in place but this does not cover the full NHH submission population and it is also not being actioned consistently, therefore the controls are weak. The impact on settlement and participants is minor based on the incomplete reporting currently available to assess the impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have contacted the customers involved to organise readings.	End December 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
With new staff onboard, we will begin more frequent checks and more intensive follow up with customers to organise readings	30/06/2023	

Correction of HHR metering information		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 19(2) Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	Estimation quality flag reporting is not monitored, which can lead to inaccurate corrections. Corrections for all nine sampled meter changes did not ensure all consumption recorded by the removed meter was included in the volume correction. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they deal with most scenarios accurately. The impact on settlement and also the calculation of seasonal shapes by the reconciliation manager is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will discuss with Robotron to implement a way to monitor these	31/01/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will discuss with Robotron to implement a way to monitor these	31/01/2024	

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	Six estimated switch event reads were incorrectly classified as actual reads. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate overall as a small number of switch event readings were incorrectly labelled for manually created CS files. The impact on settlement and participants is low. Applying the read type "A" does not impact on other traders' ability to issue read renegotiation requests under clause 6(2) and (3) Schedule 11.3.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste.	30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be hiring more switching staff; this will lessen the overall load, prevent human errors made in haste.	30/06/2023	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15</p> <p>Schedule 15.2</p> <p>From: 01-Mar-22</p> <p>To: 30-Sep-22</p>	<p>HHR estimates across meter changes for nine ICPs not including volume from removed meter between last midnight read and removal read.</p> <p>Initial estimates of interval data not revised when the missing period is partially replaced by actual data from the AMI MEP.</p> <p>Actual interval data where the AMI MEP has indicated the data has failed a sum check validation is replaced with estimated interval data without investigation to verify if the failed validation is due to corrupt interval data or midnight reads.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because while estimates are created, they are not always the correct treatment for addressing interval data gaps or ongoing non-communicating AMI ICPs.</p> <p>The impact is low because revised submission data is eventually provided once the submission type is backdated to NHH for historical periods. There are some impacts to seasonal shapes used for NHH submissions where these retrospective updates of submission types (HHR to NHH) occur.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We are investigating options to provide solutions for the above non-compliance. The reasons why vacant non-communicating meters were not resolved were due to access issues.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
It would be difficult to eliminate the above issue but we will investigate options to put controls in place and provide best estimate where possible.	Ongoing	

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	Event logs not routinely reviewed across all AMI providers. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because most validations occur. The impact on settlement and participants is minor; therefore, the audit risk rating is low. Phase failure, reverse power and meter critical events are individually emailed by MEPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will speak to the relevant MEPs to further understand the actions required for different events. We are planning to implement a data management system to identify events that require follow up.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will speak to the relevant MEPs to further understand the actions required for different events. We are planning to implement a data management system to identify events that require follow up.	31/01/2024	

Calculation of ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Mar-22</p> <p>To: 30-Sep-22</p>	<p>ICP Days file is not sourced from Ecotricity's reconciliation data.</p> <p>Alleged breach 2207ECOT1 for late provision of AV110 submissions for June 2022 r1 and May 2021 r14.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as weak because the data is not sourced from Ecotricity's own data, however efforts are made to validate and update Ecotricity's set-ups with registry data each month and manual corrections are applied to the aggregated submission information files to attempt to submit complete consumption volumes.</p> <p>The main impact is on the scaling function, which cannot be correctly applied by the reconciliation manager as Ecotricity attempts to replicate the registry values and avoid any potential scaling from any missing/late or incorrect ICPs/meter set-ups; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Ecotricity will transition to submitting the ICP Days file from eSales. This will be a slow transition as we investigate and understand the discrepancies we are seeing between the produced file and the registry.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ecotricity will transition to submitting the ICP Days file from eSales. This will be a slow transition as we investigate and understand the discrepancies we are seeing between the produced file and the registry.	31/01/2024	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Mar-22 To: 30-Sep-22	Errors in both HHRVOLS and HHRAGGS file between July and September 2021 with differences ranging between 129 and 80,535 kWh. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as weak because the approach to resolving differences between HHRVOLS/HHRAGGS and the registry LIS file is resulting in volume inaccuracies in the submission files. The efforts to resolve the differences should be directed in the ICP set-ups prior to submission and where the discrepancy still exists allow the ICP Days scaling to account for these exceptions. The impact is assessed to be medium as while the kWh differences are large initially, they reduce to minor differences in subsequent revisions.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue improvement and monitoring the accuracy of the submission files.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue improvement and monitoring the accuracy of the submission files.	31/01/2024	

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 01-Mar-22 To: 30-Sep-22	Errors in both HHRVOLS and HHRAGGS file between April 2021 and February 2022 with differences ranging between 129 and 80,535 kWh. Submission of 548,228 kWh yet to occur for 14 inactive ICPs with consumption. 17 incorrect UML daily kWh values used in submission. Under submission of 2,137.84 kWh due to vacant ICP 0001442650UN73B not included in submission due to missing vacant account set-up. NHH generation kWh not submitted at the earliest opportunity for at least 20 ICPs. HHR generation kWh not submitted at the earliest opportunity for 21 ICPs. Potential impact: High Actual impact: High Audit history: Multiple Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	Controls are rated as weak at the time of the audit because the validation reporting is in place and submission issues are being identified, but further work is required to improve the timeliness of the corrections and ensure the correction is resolved at the source of the issue rather than manual adjustments made to submission files. The impact is assessed to be high because the kWh volumes missing from submissions are large.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continue improvement and monitoring the accuracy of the submission files.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue improvement and monitoring the accuracy of the submission files.	31/01/2024	

Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 01-Mar-22 To: 30-Sep-22</p>	<p>15 ICPs with standard UML had an incorrect calculation of daily kWh values with an annual impact of 24,938 kWh.</p> <p>Submission of 548,228 kWh yet to occur for 14 inactive ICPs with consumption.</p> <p>Incorrect readings used for five ICPs sampled where Ecotricity settle as HHR, the CS read was estimated, and no read request change was sent to ensure the transfer read is accurate across the change of trader and submission types.</p> <p>Ecotricity did not use the provided CS read for five ICPs where the RR file was rejected by the losing trader.</p> <p>Two shared UML ICPs (0001351650PCA57, 0005808588RN085) where the unmetered load flag is yes, but the daily unmetered kWh is incorrectly recorded as zero.</p> <p>Submission had not occurred for 21 HHR ICPs and 72 NHH ICPs with distributed generation and the RM was not notified of gifting.</p> <p>HHR corrections for AMI meter changes did not ensure all consumption recorded by the removed meter was included in the volume correction.</p> <p>ICP Days file is not sourced from Ecotricity's reconciliation data.</p> <p>Errors in both HHRVOLS and HHRAGGS file between July and September 2021 with differences ranging between 129 and 80,535 kWh.</p> <p>Under submission of 2,137.84 kWh due to vacant ICP 0001442650UN73B was not included in submission due to missing vacant account set-up.</p> <p>On three occasions the NHH submission accuracy was outside the $\pm 15\%$ accuracy due to misreads being released resulting in over submission of volume.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple Controls: Weak Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
High	<p>Controls are rated as weak at the time of the audit, because the validation reporting is in place and submission issues are being identified, but further work is required to improve the timeliness of the corrections and ensure the correction is resolved at the source of the issue rather than manual adjustments made to submission files.</p> <p>The impact is assessed to be high because the kWh volumes missing from submissions are large.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Many of the other non-compliance points address these issues. As we work to address all issues raised in this audit, they will result in also addressing this point.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Many of the other non-compliance points address these issues. As we work to address all issues raised in this audit, they will result in also addressing this point.	31/01/2024	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Mar-22 To: 30-Sep-22	Estimates not all replaced by the 14-month revision. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak as issues preventing ICPs being correctly reported are still present at the 14-month revision and while there are manual attempts to adjust volumes to mitigate the impact of these errors on other participants, the controls need to focus on resolving the issue at root cause rather than manual adjustments on each wash up file. The impact on settlement and participants is minor due to the efforts in applying manual adjustments to the wash up files; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Ecotricity will create a report to help with resolving FE related issues.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ecotricity will create a report to help with resolving FE related issues.	31/01/2024	

Reconciliation participants to prepare information		
Non-compliance	Description	
<p>Audit Ref: 12.9</p> <p>With: Clause 2 Schedule 15.3</p> <p>From: 01-Mar-22</p> <p>To: 30-Sep-22</p>	<p>Five of nine sampled ICPs with unmetered load had inaccurate submission volumes due to incorrect daily kWh calculations.</p> <p>Aggregation of the AV090 and AV140 reports is not compliant as manual adjustments are made to the aggregated files that result in the files no longer being aligned.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate at the time of the audit, because the validation reporting has been improved with the exception of monitoring the accuracy of the Daily kWh value.</p> <p>The impact on settlement and participants from the swings in HHR volumes due to the manual file adjustments is moderate therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A report has been created within eSales to monitor discrepancies of UML ICPs. We will implement a process to check and correct and errors.</p> <p>We will begin to transition away from manually adjusting submission files.</p>	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A report has been created within eSales to monitor discrepancies of UML ICPs. We will implement a process to check and correct and errors.</p> <p>We will begin to transition away from manually adjusting submission files.</p>	31/01/2024	

Reconciliation participants to prepare information		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Mar-22 To: 30-Sep-22	Some balancing area differences between revisions were over the <u>± 15%</u> threshold because of inaccurate forward estimates. Five occurrences where the submission accuracy at AV-080 file level was outside +/- 15% between June 2021 and July 2022 at file level. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak due to the volume of manual adjustments applied to the aggregated AV-080 file as forward estimate volumes means it is not possible to track whether the submission inaccuracy is related to estimation algorithm accuracy or due to human error when applying these manual adjustments. The impact on settlement and participants is minor as the wash ups do correct the initial submission inaccuracy therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Ecotricity will review the estimation algorithm used to ensure submission accuracy.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ecotricity will review the estimation algorithm used to ensure submission accuracy.	31/01/2024	

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 Schedule 15.3 From: 01-Mar-22 To: 30-Sep-22	Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	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.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will review HE processes to investigate and resolve HE issues to meet required thresholds.	31/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will review HE processes to investigate and resolve HE issues to meet required thresholds.	31/01/2024	