

Compliance plan for ForOurGood – 2023

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2</p> <p>From: 01-Sep-21</p> <p>To: 09-Dec-22</p>	<p>ICP 0438360974LC55A has an incorrect ANZSIC code recorded.</p> <p>ICP 0000063546TR2A9 has an incorrect inactive status event date recorded.</p> <p>ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.</p> <p>IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are strong overall because a small number of exceptions were identified. The incorrect data is expected to have little to no impact on the reconciliation process. Where submission data is affected, corrected data will be provided through the revision process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Property 0438360974LC55A has been updated to an ANZSIC of S955 Civic Professional and Other Interest Group Services.</p> <p>0000063546TR2A9 meter disconnection job undertaken by MEP on 12/07/2022, however when they got there the site was already disconnected (as confirmed in the MEP paperwork). There was a fire at the property on 20/06/2022 so FOGY believes it was likely that the network safety disconnected that date (especially as readings stopped on that date). As such FOGY updated the disconnection date to 20/06 to more accurately reflect date of disconnection. FOGY does not believe this needs to be adjusted.</p> <p>FOGY is continuing to communicate with Intellihub in order to obtain the missing I flow volume data for ICP</p>	15/03/2023	Investigating

0000509243NR543. FOGY is currently waiting for a response from Intellihub.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Instruction manual has been updated to further emphasise that NT files sent for non-residential properties need to have the ANZSIC updated before sending.	31/01/2023	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 30-Aug-22 To: 30-Aug-22	One reconnection was not certified within five business days. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as there is not currently a process to ensure that ICPs are certified on reconnection, but there are quarterly processes to check certification is current for all ICPs. The audit risk is low as only one ICP was affected by the non-compliance.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY has raised a meter recertification SR with the meter company for ICP 0000022928TR8FB in order to resolve this issue.	10/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will check meter certification when arranging meter reconnections in future. Training manuals have been updated to emphasise this point more clearly.	10/02/2023	

Changes to registry information	
Non-compliance	Description
Audit Ref: 3.3	Nine late updates to active status for reconnections. Four late updates to inactive status for disconnections.

With: Clause 10 Schedule 11.1 From: 10-Nov-21 To: 23-Sep-22	<p>Four late trader updates.</p> <p>One ANZSIC code update was made more than 20 business days after FOGY began trading at the ICP.</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		
Low	<p>The controls are recorded as strong because a small number and proportion of updates were late. In most cases the late updates were caused by late notice of the required change by another party.</p> <p>The audit risk rating is low because the impact on settlement and participants is minor.</p>		
Actions taken to resolve the issue	Completion date	Remedial action status	
All Updates had been made prior to Audit. Additional notes made about follow-up timeframes	31/01/2023	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
Further care will be taken to ensure reconnection/disconnection tickets are checked daily and updated as soon as job confirmation is received.	31/01/2023		

ANZSIC codes	
Non-compliance	Description
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 18-Mar-22</p> <p>To: 09-Dec-22</p>	<p>ICP 0438360974LC55A had an incorrect ANZSIC code recorded. 000000 residential was applied but S955 Civic Professional and Other Interest Group Services was expected.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating

Low	<p>Controls are strong overall. Almost all ICPs have residential ANZSIC codes correctly recorded and there is a process to ensure correct ANZSIC codes are recorded for non-residential ICPs. This appears to be an isolated exception.</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
Property 0438360974LC55A has been updated to an ANZSIC of S955 Civic Professional and Other Interest Group Services.		09/02/2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Instruction manual has been updated to further emphasise that NT files sent for non-residential properties that have failed normal sign-up criteria, but have been whitelisted to allow sign-up need to have the ANZSIC updated before sending.		09/02/2023	

Management of "inactive" status			
Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 20-Jun-22</p> <p>To: 12-Jul-22</p>	<p>ICP 0000063546TR2A9 was disconnected on 12 July 2022 and was originally correctly entered on the registry as inactive from 12 July 2022 on 13 July 2022. Later that day the status record was reversed and incorrectly replaced with an inactive record dated 20 June 2022.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are moderate overall. There are processes in place to ensure that status updates are correct and inactive consumption is identified, however, inactive consumption is not always investigated on a timely basis.</p> <p>The impact is low because inactive consumption is submitted. The incorrect status date for ICP 0000063546TR2A9 does not impact on submission, because all volumes are submitted regardless of status.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
0000063546TR2A9 meter disconnection job undertaken by MEP on 12/07/2022, however when they got there the site was already disconnected (as confirmed in the MEP paperwork).		07/02/2023	Cleared

There was a fire at the property on 20/06/2022 so FOGY believes it was likely that the network safety disconnected that date (especially as readings stopped on that date). As such FOGY updated the disconnection date to 20/06 to more accurately reflect date of disconnection.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Current Process cover this and Updates and corrections will always be made after the case is investigated and suitable information to support any changes is available	07/02/2023	

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: 18-Jul-22 To: 18-Jul-22	One AN had an incorrect response code applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong. Although the files are created manually, only one (0.1%) of the 869 transfer and switch move AN files checked had an incorrect response code. The ICP had previously had an advanced meter and the flag was changed to N the month before it switched out. The impact is assessed to be low, as the MEP had the correct metering information populated on the registry.	
Actions taken to resolve the issue	Completion date	Remedial action status
No actions have been taken to remediate the CS sent with incorrect response code as the meter is now listed as AMI Comm.	09/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We've updated our instruction manual for AN processes to say when AA response codes should be sent so we will not make this mistake again.	09/02/2023	

Losing trader must provide final information - standard switch	
Non-compliance	Description

Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 08-Feb-22 To: 16-Sep-22	Six transfer CS files contained an incorrect last actual read date. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate because most CS file content was accurate, but almost all CS files with estimated switch event readings had incorrect last actual read dates recorded. The impact is low, because there is no direct impact on the customer, other trader, or reconciliation. The last actual read date can be used to help assess the likelihood that the estimated switch reading is correct.	
Actions taken to resolve the issue	Completion date	Remedial action status
Our instruction manual was not clear that the Last Actual Read Date on CS files should be the date of the last Actual Read. It has now been corrected. Our processes have been updated so information to be put in the CS file is the correct date.	09/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process updates to query the last actual read date from our database rather than the last read date (which includes estimates) should ensure that the correct date is populated in the Last Actual Read Date field in future.	09/02/2023	

Losing trader provides information - switch move	
Non-compliance	Description
Audit Ref: 4.8 With: 10(1) Schedule 11.3 From: 03-Mar-22 To: 03-Mar-22	One E2 breach where the CS event date was before the gaining trader's requested event date. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>The controls are strong, the error was isolated and caused by a typo. FOGY is aware of the event date requirements.</p> <p>The audit risk rating is low because the switch was withdrawn and completed from the correct date.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The error was a typo, the NT and AN proposed event date was 2 March 2022, but the switch was completed for 3 February 2022. A withdrawal was immediately completed and accepted by the other trader, and the switch was then re-requested and completed for the correct date.	07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process is clearly defined and additional checks added to ensure correct dates are sent	07/02/2023	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 26-May-22</p> <p>To: 12-Sep-22</p>	<p>Three switch move CS file contained incorrect switch event read types.</p> <p>Three switch move CS files contained an incorrect last actual read date.</p> <p>One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as moderate because most CS file content was accurate.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> actual and estimated switch event readings are treated as permanent by the historic estimate process; because the CS files affected were switch moves and FOGY is a HHR trader, the incorrect classification does not have any impact on the other trader's ability to issue read renegotiations under Clause 6 (2) and (3) Schedule 11.3, the last actual read date can be used to help assess the likelihood that the estimated switch reading is correct and does not have a direct impact on the customer, other trader, or reconciliation, and

	<ul style="list-style-type: none">• the difference between the CS read and read recorded in the system for ICP 0339943041LCEB7 8 August 2022 is 5 kWh, so the impact on billing and settlement is low.
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Actions taken to resolve the issue	Completion date	Remedial action status
FOGY submitted the CS for 0339943041LCEB7 on 09/08/2022 in order to avoid a registry breach. The property was disconnected on 26/06. We had no reads from the MEP until 12/08/2022 so we went off the reading that was provided in the manual disconnection paperwork from the MEP for 111130. FOGY does not believe that we submitted an incorrect read.	07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY Endeavours to send the correct readings at the time the CS file is due. Existing processes cover this and FOGY will complete RR's should it be identified that a correct actual reading is available	07/02/2023	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 08-Aug-22 To: 08-Aug-22	One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong because I only found one instance where the agreed switch event reading was not applied. The impact is low. The difference between the CS read and read recorded in the system for ICP 0339943041LCEB7 8 August 2022 is 5 kWh, so the impact on billing and settlement is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY submitted the CS for 0339943041LCEB7 on 09/08/2022 in order to avoid a registry breach. The property was disconnected on 26/06. We had no reads from the MEP until 12/08/2022 so we went off the reading that was provided in the manual disconnection paperwork from the MEP for 111130. FOGY does not believe that we submitted an incorrect read. But acknowledge that an RR should have been sent to correct this due to updated data in our system post switch	07/02/2023	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
A process update will be put in place that whenever a re-estimate or new read information becomes available after sending a CS, an RR process will be initiated. It is rare that FOGY would need to Trigger this as we do not often receive or re-estimate data post switch, other than when triggered by an RR from the Gaining retailer	07/02/2023

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 03-Mar-22</p> <p>To: 21-Sep-22</p>	<p>Two outgoing NWs had incorrect NW withdrawal advisory codes applied.</p> <p>One outgoing NW was issued in error and was rejected by the other trader.</p> <p>Three NA breaches.</p> <p>One incoming NW file was rejected in error.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. The late files were all wrong premises withdrawals, which are often difficult to identify and require thorough investigation before the NW is issued. NW and AW files are generated manually, and a small number were issued in error or with an incorrect code.</p> <p>The impact on other participants is low. The late NW files were 70-98 days overdue, the invalidly issued NW was rejected by the other trader, and the ICP for invalidly rejected NW switched out to the losing trader.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Customer for 0000517650NRF0E had already closed their account with FOGY. NWDF was sent as move in date was incorrect. NWS did not need to be applied	07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will ensure that code NWCE is used in future where proposed date is no more than ten business days in the future. Training manuals have been updated to reflect this.	07/02/2023	

Metering information			
Non-compliance		Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 08-Aug-22 To: 08-Aug-22		One switch move CS file contained an incorrect switch event read, which was 5 kWh lower than the read recorded in the system. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as strong because I only found one instance where the agreed switch event reading did not reflect an actual or estimated reading at the end of the last day of supply. The impact is low. The difference between the CS read and read recorded in the system for ICP 0339943041LCEB7 8 August 2022 is 5 kWh so the impact on billing and settlement is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
FOGY submitted the CS for 0339943041LCEB7 on 09/08/2022 in order to avoid a registry breach. The property was disconnected on 26/06. We had no reads from the MEP until 12/08/2022 so we went off the reading that was provided in the manual disconnection paperwork from the MEP for 111130.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As in Audit Ref: 4.11 A process update will be put in place that whenever a re-estimate or new read information becomes available after sending a CS, an RR process will be initiated. It is rare that FOGY would need to Trigger this as we do not often receive or re-estimate data post switch, other than when triggered by an RR from the Gaining retailer		07/02/2023	

Electricity conveyed & notification by embedded generators	
Non-compliance	Description
Audit Ref: 6.1 With: Clause 10.13	Energy is not metered and quantified according to the code where meters are bridged. Potential impact: Low Actual impact: Low Audit history: None

From: 26-Nov-21 To: 20-Sep-22	Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong because meters are bridged rarely. The volume of ICPs with bridged meters is small and there are processes in place to ensure that an estimate of consumption is submitted to minimise the impact.	
Actions taken to resolve the issue	Completion date	Remedial action status
Processes are in place and were followed to resolve any identified bridged meters. All examples above followed that process to resolved and volumes were correctly submitted	07/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Processes are in place and were followed to resolve any identified bridged meters. All examples above followed that process to resolved and volumes were correctly submitted	07/02/2023	

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 21-May-22 To: 12-Sep-22	Three switch move CS files had incorrectly recorded switch event read types. 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 rated as strong, because a very small proportion of CS files contained incorrect read types. The audit risk rating is assessed to be low. Actual and estimated switch event readings are treated as permanent by the historic estimate process. Because the CS files affected were switch moves and FOGY is a HHR trader, the incorrect classification does not have any impact on the other trader's ability to issue read renegotiations under Clause 6 (2) and (3) Schedule 11.3.	
Actions taken to resolve the issue	Completion date	Remedial action status
0000752270TEECD was an estimated read that was provided by the MEP. FOGY has updated process checks to ensure we will	07/02/2023	Identified

send all future CS's with correct read type, as recorded in our system. 1001260404UN39B at the time of sending the CS, the read for 23/07/2022 had not been received from the MEP, that read arrived on 28/07/2022, CS was sent on 27/07/2022.		
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will ensure that all estimated CS reads are flagged as estimates in future.	07/02/2023	

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 08-Aug-22 To: 09-Dec-22	ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because most submission information was accurate. The impact is low because corrected submission information will be provided through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY is continuing to communicate with Intellihub in order to obtain the missing I flow volume data for ICP 0000509243NR543. FOGY is currently waiting for a response from Intellihub.	20/02/203	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Current process cover this and any issues identified are investigated and action on gaining the appropriate information. Any revisions then correct this information to the Market	07/02/2023	

Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 08-Aug-22 To: 09-Dec-22</p>	<p>ICP 0000509243NR543 had a meter configuration issue which prevented I flow volumes from being submitted from when the ICP switched in on 3 August 2022 until it was detected in October. I flow volumes will be provided from August 2022 onwards through the revision process.</p> <p>IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong, because most submission information was accurate.</p> <p>The impact is low because corrected submission information will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
FOGY is continuing to communicate with Intellihub in order to obtain the missing I flow volume data for ICP 0000509243NR543. FOGY is currently waiting for a response from Intellihub.		20/02/2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
As with Audit ref 12.2 - Current process cover this and any issues identified are investigated and action on gaining the appropriate information. Any revisions then correct this information to the Market		07/02/2023	