

Compliance plan for Simply Energy Reconciliation Participant Audit 2022

Relevant information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2 & 15.2</p> <p>From: 01-Jan-22</p> <p>To: 16-Dec-22</p>	<p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</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		
Low	<p>Controls are rated as moderate as the controls have been improved during the audit period but there is still room for improvement.</p> <p>The impact is assessed to be low based on the minor impact on submission accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The root cause of these issues is the inaccuracy previously identified with the readings data being sent to MADRAS (the NHH DA system). A code change to address these inaccuracies has been reviewed and released via a material change audit in February 2023. While some historic data issues might still exist, we are now confident that the risk of future issues is much reduced.</p>		21/02/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A code change to ensure all readings inserted, removed (unvalidated) or updated, are sent to MADRAS regardless of the date has been released via a material change audit in February 2023. While some historic data issues might still exist, we are now confident that the risk of future issues is much reduced.</p>		21/02/2023	

Data transmission		
Non-compliance	Description	
<p>Audit Ref: 2.3</p> <p>With: Clause 20 Schedule 15.2</p> <p>From: 01-Jan-22</p> <p>To: 16-Dec-22</p>	<p>SELS</p> <p>Some validated actual readings are not recorded in MADRAS because they are omitted during the data transfer process.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate. In most cases readings are correctly recorded in MADRAS. The impact is unknown but assessed to be medium because:</p> <ul style="list-style-type: none"> the issue affects all readings on days which are 30 days before the ETL process is run; because the ETL process is usually run weekly, reads are present in MADRAS for most days and the more frequently the process is completed, the higher the risk of missing reads, and the issue will only affect historic estimate calculations if the first and/or last reads within each reconciliation period are missing, excluded reads will not be used to calculate historic estimate and could result in inaccurate apportionment of consumption between reconciliation periods and/or forward estimate which differs from actual consumption being submitted. 	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The root cause of the most material issues were addressed via a code change effective 16 May 2022 to the SQL query extracting data from the Datawarehouse.</p> <p>It is expected that the code change detailed in the preventative solutions section will resolve additional issues with correct readings being used to calculate submission information.</p>	<p>Complete</p> <p>31/12/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A code change to ensure all readings inserted, removed (unvalidated) or updated, are sent to MADRAS regardless of the date has been released via a material change audit in February 2023. This issue is now resolved.</p>	21/02/2023	

Connection of an ICP			
Non-compliance		Description	
Audit Ref: 2.9 With: Clause 10.32 From: 05-Oct-21 To: 26-Jan-22		SELS Responsibility was not accepted before 0000051418WE4CB was connected on 5 October 2021. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		Simply Energy's controls are strong, the issue occurred because WEL Networks had not advised of the historical connection. The impact is assessed to be low, and submission data has been provided since the connection date advised by WEL Networks.	
Actions taken to resolve the issue		Completion date	Remedial action status
Late update was required as unfortunately, due to human error this ICP was not actioned when we were first alerted to it. Our catch up meetings twice a week ensures that this does not reoccur		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control		01/07/2023	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 01-Apr-21</p> <p>To: 03-Dec-21</p>	<p>SELS</p> <p>Two new connections were not certified within five business days of the initial electrical connection date.</p> <p>One reconnection was not certified within five business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as there are processes in place to monitor certification for existing ICPs and follow up missing or expired certification for ICPs which are connected or reconnected.</p> <p>The audit risk is low as only three ICPs were affected during the audit period.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We cannot correct historic timeliness of these updates	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality</p> <p>- Operations Team Lead is also acting as Quality Control</p> <p>We are also working with our system administrator to improve our current process in Salesforce to assist with timing and actions and to provide the Operations Team Leader visibility to assist and/or add resource where required</p>	<p>01/07/2023</p> <p>01/10/2023</p>	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Jan-22</p> <p>To: 06-Oct-22</p>	<p>SIMP</p> <ul style="list-style-type: none"> Two late updates to inactive status. <p>SELS</p> <ul style="list-style-type: none"> Four late updates to active status for reconnections. Ten late updates to inactive status. 38 late trader updates. 14 late ANZSIC code updates. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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, due to the very high proportion of updates made on time. Almost all late updates caused by delays in Simply Energy processing the change occurred early in the period, and most of the late updates were caused by delays in receiving or confirming event attributes.</p> <p>The audit risk rating is assessed to be low as the overall volume of backdated events was small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Late updates cannot be corrected. NB Meetings were held immediately after the Audit to ensure that Data Quality and timeliness was a daily priority. Process refreshers were also provided to all team members.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p> <p>We are also working with our system administrator to improve our current process in Salesforce to assist with timing and actions and to provide the Operations Team Leader visibility to assist and/or add resource where required.</p>	<p>01/07/2023</p> <p>01/10/2023</p>	

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 17-Jan-22</p> <p>To: 13-Jul-22</p>	<p>SELS</p> <ul style="list-style-type: none"> • 25 late status updates for new connections. • 15 late MEP nominations for new connections. • 14 late initial ANZSIC code updates. <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 rated as moderate, the controls in place will mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as the controls in place ensure that ICPs are made active as soon as possible, and discrepancy reporting ensures any mismatches are corrected as soon as possible. Revised submission data is provided through the wash up process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Late updates cannot be corrected. We continue to review the ANZSIC codes of ICPs that we switch in from other traders to get them as accurate as possible, which includes periodic reviews of all ICPs. Sometimes this will mean we update an ANZSIC code weeks after switching an ICP where we believe the coding can be improved - as discussed with auditor we are prioritising accuracy over timeliness.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p> <p>Monthly reports are sent to Operations where the ANZSIC code requires further investigation for existing ICP's - Operations works closely with our customer care team to provide the correct codes and we update Registry as soon as we have an improved code confirmed.</p>	<p>01/07/2023</p> <p>Ongoing</p>	

Management of "active" status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 01-Jan-22</p> <p>To: 30-Nov-22</p>	<p>SELS</p> <p>Three SELS ICPs had more than one active customer and switched out effective 1 December 2022.</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 moderate, and a solution is being developed to allow one customer to be recorded for these types of ICPs. The issue has been cleared for Simply Energy because the ICPs have switched to CTCS.</p> <p>The impact is low because three ICPs are affected and the airport is treated as the overarching customer in each case, which allows Simply Energy to liaise with one party in the event of maintenance or an outage for the ICP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Issue has been cleared.		1/12/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required here.		N/A	

Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 17-Oct-22</p> <p>To: 15-Dec-22</p>	<p>Two ICPs (1001280350TC294, 1001280352TC211) where the disconnection reading was deleted in error resulting in a total of 24 kWh of consumption being incorrectly recorded during the inactive period.</p> <p>ICP 0000005028CB2A0 – (341 kWh) had genuine consumption detected but the registry status was inactive.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls have improved during the audit period with regular monitoring occurring to check status dates are applied correctly being reinstated. Controls are rated as moderate, as the report threshold means not all exceptions are identified and not all inactive ICPs are being read to enable inactive consumption to be detected.</p> <p>The number of ICPs affected and volume that was under reported was small, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Corrected and actioned. In addition, any reviewed inactive ICP's where consumption is detected are actioned on the day once Operations is notified	13/12/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p> <p>A task has been added to the regular monthly compliance schedule to ensure all inactive ICPs are reviewed to ensure there is no consumption. ICPs inactive will remain on Meter Reader Schedules.</p>	<p>01/07/2023</p> <p>Ongoing</p>	

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: 14-Apr-22</p> <p>To: 26-Jul-22</p>	<p>SELS</p> <p>The CS files for 0010423478EL5E7 26 July 2022 and 0000857700TE7CF 14 April 2022 had incorrect last actual read dates recorded.</p> <p>The CS files for 0000335080MP1BE 26 May 2022 and 0004557794TCD57 31 May 2022 contained incorrect average daily kWh. The values were within ±83 kWh of the expected value.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be strong because the template has been corrected, and no further issues were identified following this correction.</p> <p>The impact is assessed to be low based on the number and nature of the exceptions identified. All CS event readings checked were correct so there is no impact on submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The issues identified were not deemed material enough to require correcting - in the case of incorrect reads, these fall within the 200kwh limit set in the code.		1/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We immediately implemented our QA process on 01/11/2022, where a backup person checks that the data is correct then gives the final approval. This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023.		30/09/2023	

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: 01-Mar-21</p> <p>To: 13-Jun-22</p>	<p>SELS</p> <p>Nine CS files contained incorrect average daily kWh values because readings were entered into the average daily kWh field in error.</p> <p>CS files for 0199407274LCODE 8 May 2022, 0000014335KP587 1 June 2022, 0000514131NR159 1 July 2022, and 0000003501TCF34 1 July 2022 had incorrect last actual read dates recorded. The last actual read date reflected the last day of supply, not the date of the last actual reading.</p> <p>The CS file for 0000046829WEFFB 1 May 2022 contained a last actual reading on the switch event date. The last actual reading is expected to be the last actual reading during SELS' period of supply.</p> <p>The CS file for 1001280409TCBCF 10 March 2022 contained an incorrect read type. Actual was recorded instead of estimate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are assessed to be strong because the template has been corrected and user training has been conducted, and no further issues were identified following this.</p> <p>The impact is assessed to be low based on the number and nature of the exceptions identified. All CS event readings checked were correct, and the ICPs with incorrect average daily kWh had HHR or AMI metering installed making it likely that the other trader would receive actual readings promptly and not need to use the average daily kWh to generate forward estimates for reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
These historic issues cannot be corrected	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We immediately implemented our QA process on 01/11/2022, where a backup person checks that the data is correct then gives the final approval. This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023	30/09/2023	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 27-Jan-22</p> <p>To: 05-Aug-22</p>	<p>SELS</p> <p>One RR breach.</p> <p>The RR for 0000031580WE264 27 January 2022 was supported by one validated actual reading and one photo reading from the customer instead of two validated actual readings.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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, the process ensures that RRs are issued as soon as possible after the supporting readings confirm they are required.</p> <p>The impact is low because one RR was issued 126 days late, and revised submission data was able to be provided through the revision process. The other trader was advised that the RR for 0000031580WE264 27 January 2022 was supported by one customer reading and one validated actual reading.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
These historic issues cannot be corrected	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>As recent as 24/02/2023, we implemented a change in Salesforce where we can request special reads from Wells for this purpose. Where we only have one actual read, we now request a special read to ensure we have 2 actual reads to request a read amendment. Typically, we will request read history from the alternative retailer if we only have one however, we now have the convenience of requesting special reads where applicable.</p> <p>This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023</p>	<p>24/02/2023</p> <p>30/09/2023</p>	

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: 23-Mar-22</p> <p>To: 01-Sep-22</p>	<p>SELS</p> <p>ICP 0000001066RJ70F 17 June 2022 which was issued with DF (date failed) but the requested transfer date was not more than ten business days in the future.</p> <p>ICP 1001280423TC40B 27 January 2022 which was issued with WS (wrong switch type) but should have been issued with CE (customer error).</p> <p>Three NA breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong, as processes are compliant and a very small number of exceptions occurred. The risk rating is low:</p> <ul style="list-style-type: none"> the other traders were aware of the reasons for the withdrawal issues with incorrect advisory codes, because Simply Energy provided supporting information via email, and the late NW files were issued 62-103 days late, and corrected data was provided for reconciliation through the revision process. 	
Actions taken to resolve the issue	Completion date	Remedial action status
These historic issues cannot be corrected	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We immediately implemented our QA process on 01/11/2022, where a backup person checks that the data is correct then gives the final approval. This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023.	30/09/2023	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13 From: 1-Apr-21 To: 18-May-22	Energy is not metered and quantified according to the code where meters are bridged. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Strong Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are strong because Simply Energy does not normally allow meters to be bridged. The impact is medium due to the extent of the unquantified consumption volume that occurred since the meter bridging event in October 2019 that needed to then be apportioned into the available revision window.	
Actions taken to resolve the issue	Completion date	Remedial action status
Simply Energy normally does not accept bridging of meters. This was unfortunately a historic issue that was not detected at the time of reconnection.	03/03/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have processes in place to correctly reconcile bridged meters as long as they occur within the 14 month washup. We also intend to put in place a process to identify Meters with 0 consumption and have this confirmed by the customer. We will start with meters with 0 consumption in the current month, but > 0 consumption in previous months, then extend to encompass all ICPs over time.	30/06/2023	

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Jan-22</p> <p>To: 31-Jul-22</p>	<p>For 32 ICPs unread during the period of supply, the best endeavours requirements were not met, and exceptional circumstances did not exist.</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 rated as moderate. There is a process in place, but compliance is not consistently achieved if the period of supply is short.</p> <p>The impact on settlement from an estimate for a short period is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Historical issue where no process was in place. We have since created a process (started in Feb 22) where any unread meter >3 months is sent to our Support team for follow up actions. This involves them contacting the customer via email on the first attempt and a phone call if a 2nd attempt is required to gain and update access details to assist the meter readers in successfully obtaining an accurate meter read.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly reports are received from Wells and actioned by the support team using this process. We also have reports in Salesforce that highlight unread meters which we use. We also can now raise a "Special meter read" to Wells to action outside the normal read cycles. This will speed up the process of us being able to send a meter read back to a site to gain an actual read when we receive access information from a customer.</p>	Ongoing	

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Jan-22</p> <p>To: 31-Jul-22</p>	<p>The meter read frequency report was not accurate prior to April 2022.</p> <p>For two ICPs unread in the 12 months ending 31 July 2022, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. There is a process in place, but compliance is not consistently achieved.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The Meter Read Frequency report has been updated and is now reporting accurately.</p> <p>Historical issue where no process was in place. We have since created a process (started in Feb 22) where any unread meter >3 months is sent and actioned by our Support team. This involves them contacting the customer via email on the first attempt and a phone call if a 2nd attempt is required to gain and update access details to assist the meter readers in successfully obtaining an accurate meter read. As the new process came in place Feb 22 some of these ICPs only had 1 attempt via email to gain access.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly reports are received from Wells and actioned by the support team using this process. We also have reports in Salesforce that highlight unread meters which we use. We also now have the ability to raise a "Special meter read" to Wells to action out side the normal read cycles. This will speed up the process of us being able to send a meter read back to a site to gain an actual read when we receive access information from a customer.</p>	Ongoing	

NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 01-Jan-22</p> <p>To: 31-Jul-22</p>	<p>The meter read frequency report was not accurate prior to April 2022.</p> <p>90% read attainment not achieved for 24 NSPs in July 2022 and exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. There is a process in place, but compliance is not consistently achieved.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The Meter Read Frequency report has been updated and is now reporting accurately.</p> <p>Historical issue where no process was in place. We have since created a process (started in Feb 22) where any unread meter >3 months is sent and actioned by our Support team. This involves them contacting the customer via email on the first attempt and a phone call if a 2nd attempt is required to gain and update access details to assist the meter readers in successfully obtaining an accurate meter read. As the new process came in place Feb 22 some of these ICPs only had 1 attempt via email to gain access.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly reports are received from Wells and actioned by the support team using this process. We also have reports in Salesforce that highlight unread meters which we use. We also now have the ability to raise a "Special meter read" to Wells to action out side the normal read cycles. This will speed up the process of us being able to send a meter read back to a site to gain an actual read when we receive access information from a customer.</p>	Ongoing	

Correction of NHH meter readings			
Non-compliance	Description		
Audit Ref: 8.1 With: Clause 19(1) Schedule 15.2 From: 01-Jan-22 To: 16-Dec-22	The meter reading history for ICP 0007108589RNEAF was deleted from MADRAS and no replacement read or estimate read was applied resulting in default consumption being applied for the affected period. Six other ICPs were also affected. 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 because the process to upload readings into MADRAS is robust and automated. However, where users attempt to correct the meter reading history by deleting the records in MADRAS prior to reimporting a revised set of meter reads, there is a risk of errors occurring. The number of affected ICPs is small therefore the impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All ICPs affected by this issue have been identified and resolved		15/12/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have now applied an additional check to capture these errors to enable corrections to be applied in a timely manner		15/12/2022	

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3)</p> <p>Schedule 15.2</p> <p>From: 15-Mar-22</p> <p>To: 15-Mar-22</p>	<p>1001280409TCBCF had an actual CS event reading recorded as estimated in its 10 March 2022 CS file.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 almost all reads checked had the correct read type recorded. The impact is low because all switch event reads are correctly treated as permanent by the historic estimate calculation process, so there is no impact on submission volumes .</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
This historic issue cannot be corrected	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We immediately implemented our QA process on 01/11/2022, where a backup person checks that the data is correct then gives the final approval. This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023.	30/09/2023	

Meter data used to derive volume information		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Jan-22 To: 16-Dec-22	EMS EIEP3 file format may round the trading period data to two decimal places if the meter does not have a multiplier and the volume for that hour has a non-zero value in the third decimal place. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	For HHR data, the controls are rated as moderate because data includes all decimal places provided for most ICPs. The impact is assessed to be low for the EIEP3 format, because a small number of ICPs are expected to be affected and the issue only affects the third decimal place under certain circumstances.	
Actions taken to resolve the issue	Completion date	Remedial action status
EMS have now updated their systems to also report to 3dp and have provided files to us in March 2023.	13/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action required here.	N/A	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Jan-22</p> <p>To: 16-Dec-22</p>	<p>Estimations are performed even though actual data is received where:</p> <ul style="list-style-type: none"> an AMI MEP has flagged the interval data as either having failed sum check validation or there were insufficient midnight reads available to perform this validation, and a partial replacement file has been provided by the AMI MEP that includes null values for previously provided actual data; the received null values then replace the previously supplied actual data which in turn triggers an estimation to be performed. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate and will mitigate risk but there is room for improvement.</p> <p>The audit risk rating is rated as low as the current replacement of actual data with estimates is limited to one AMI MEP and has a small impact on submission accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Our Data Service Provider is currently developing a fix for this issue.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pending successful development and a Material Change Audit this issue will be resolved.	30/06/2023	

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Jan-22 To: 16-Dec-22	AMI event logs are not routinely reviewed. 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 as where an AMI MEP identifies and alerts Simply Energy of an issue impacting the integrity of the meter via email these events are investigated and action taken where required; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
This is to be addressed in a report from our new Data Warehouse.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
New Reporting in our Data Warehouse will address this issue	30/06/2023	

Creation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 01-Jan-22 To: 16-Dec-22</p>	<p>One ICP (1001280400TC59E) did not have consumption (11 kWh) during a vacant inactive period reported.</p> <p>Three ICPs (0000051418WE4CB, 0000328398MP8C5, 0000638910MPOA3) had incorrect unmetered load information resulting in an under submission of 136 kWh for May 2022.</p> <p>Three ICPs (1001280350TC294, 1001280352TC211, 0000005028CB2A0) had consumption recorded during inactive periods that was initially included in submission.</p> <p>Some corrections identified in the previous audit not corrected and are now outside the revision cycle.</p> <p>Some readings in MADRAS have been deleted and not replaced prior to the 14-month revision.</p> <p>Historic Estimates not calculated for ICPs with only one day period of supply.</p> <p>HHR data not submitted for one day for ICP 0000047002TCBE4.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate overall. Improvements are required to some of the controls.</p> <p>The impact is low based on the volume difference identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
All noted issues in this last Audit have been identified and resolved including as an example 0000047002TCBE4 volume issue was corrected in the 7-month revision submitted in March 2023.	31/03/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Going forward in each audit a Log is created to identify any issues raised in the audit and resolved within specific times so that this issue of non-compliance is not repeated.	28/02/2023	

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 01-Jan-22 To: 16-Dec-22</p>	<p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>Actual HHR data being replaced by estimates where flagged as unvalidated by the MEP.</p> <p>Actual HHR data being replaced by estimates where partial replacement file if provided that includes null values for data already sent.</p> <p>One day of actual HHR data for ICP 0000047002TCBE4 missing from submission due to a failed validation and was not replaced by an estimation.</p> <p>EMS EIEP3 file format may round the trading period data to two decimal places if the meter does not have a multiplier and the volume for that hour has a non-zero value in the third decimal place.</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	
Low	<p>Controls are rated as moderate as the controls have been improved during the audit period but there is still room for improvement.</p> <p>The impact is assessed to be low as the impact on submission accuracy is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
All these issues are noted above and have pending actions or have been completed. Refer to sections 9.1, 9.3, 12.2.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All of these issues are noted above and have pending actions or have been completed. Refer to sections 9.1, 9.3, 12.2.	Ongoing	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Jan-22 To: 16-Dec-22	Some estimates are not replaced at R14. 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 considered weak as there are processes to attain readings, but there is no process to enter permanent estimates where reading cannot be obtained. The impact is assessed to low due to the impact on submission accuracy.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are unable to correct previous FE reporting in the R14 files	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All revisions are now monitored for Historic Estimate percentages. R14 submissions for the past two washup periods is now sitting at 100% HE. By the time SELS runs through all months left the HE for all months will be at 100%.	31/01/2024	

Historical estimates and forward estimates		
Non-compliance	Description	
Audit Ref: 12.10 With: Clause 3 Schedule 15.3 From: 01-Jan-22 To: 16-Dec-22	Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate. 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 historic and forward estimate is correctly identified most of the time. There is a low impact on settlement because shape files are used for most scenarios.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are unable to correct previous FE reporting	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
End of month reads are now uploaded for UML ICPs. 100% HE is achieved on these.	31/01/2023	

Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Jan-22 To: 16-Dec-22	Some balancing area differences between revisions were over the ± 15% threshold because of inaccurate forward estimates. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as Simply Energy has appropriate forward estimate processes in place. The audit risk rating is low because revised submission data will be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are unable to correct previous FE reporting	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A process was implemented in March 2023 to monitor any ICPs not read at 12 months in addition to normal No Read Event Reporting. The ICPs involved are then escalated to Solutions to individually investigate to see if an actual reading can be obtained. In addition to the stronger control related to gaining meter readings detailed in this audit report, a further submission process enhancement is planned to be implemented by the end of this financial year to enable automated creation of permanent estimates at R14 where no actual reading can be obtained.	30/06/2023	

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 of schedule 15.3 From: 01-Jan-22 To: 16-Dec-22	Historic estimate targets were not met for all months and revisions. Potential impact: Medium 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 considered moderate because: <ul style="list-style-type: none"> meter reading read attainment is high, and most of the forward estimate checked was historic estimate, which was mislabelled as forward estimate because shape files were unavailable for the ICP's profile. The impact of the non-compliance is dependent on the accuracy of the estimates applied. There are sound estimation processes, therefore I have recorded the audit risk rating as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are unable to correct previous submissions	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All revisions are now monitored for Historic Estimate percentages. R14 submissions for the past two washup periods is now sitting at 100% HE. By the time SELS runs through all months left the HE for all months will be at 100%.	31/01/2024	