Compliance plan for Mercury NZ Limited Certified Reconciliation Participant 2023

Relevant information	
Non-compliance	**Description**
Audit Ref: 2.1 With: Clause 10.6,11.2 & 15.2 From: 01-Jan-22	**MEEN** Some registry discrepancies resulting in submission inaccuracies. Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate. At least eight ICPs have solar generation but submission is not occurring, and notification of gifting has not been provided. ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum). Generation interval data for Maraetai increments in units of 10 kWh with zero decimal places. ICP 1099569118CN9D3 has been stopped since 2019, but the correction was only conducted for the current customer, which was a five-month period back from 21 March 2022. There was at least 3,600 kWh not accounted for. **TRUS** Some registry discrepancies resulting in submission inaccuracies. ICP 0000702000MP807 unmetered load details corrected post the last audit and this is now outside the 14-month revision cycle. Unmetered load details incorrect on the registry and two examples were found where the UNM flag was incorrect and therefore the unmetered load has not been submitted resulting in a very minor under submission. Some incorrect active dates. Two examples where switch reads were not applied resulting in 237 kWh of over submission for the incorrect period. Bridged meter corrections not applied for two of a sample of 13 ICPs. Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted. Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process. A sample of three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission, resulting in 2,095 kWh under submission per annum. ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. Potential impact: Medium

To: 07-Dec-22	Actual impact: Medium Audit history: Multiple Controls: Moderate Breach risk rating: 4		
Audit risk rating	**Rationale for audit risk rating**		
Medium	The controls are rated as moderate as they will mitigate risk most of the time, but there is room for improvement around timeliness of corrections and also identification of where a correction is required to be applied and ensuring the correction is applied within the 14-month revision window. The audit risk rating is assessed to be medium when considering the accumulative impact on settlement.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**

MEEN		Identified
Some registry discrepancies resulting in submission inaccuracies. Specific comments are included in the relevant sections of this report.	N/A	
Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate. ARC meters were only designed to record the interval data to one decimal place. The EA has granted an exemption to the MEP but this does not extend to traders. In May 2022 Vector Metering advised that they are actively replacing all of the ARCS meters and have to date replaced more than 60% of the ARCS meters Mercury were trading on with the remainder to be replaced over the next 12 months.	Ongoing	
At least eight ICPs have solar generation but submission is not occurring, and notification of gifting has not been provided. Keep a record of any ICPs that have suspected solar, either due to reverse power being reported from the MEP or the installation type changing to B. Arrange contact with customer to confirm solar and get IMP/EXP meter installed.	May 2023	
ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum). 0000540450TE6E7 - site visit was completed in 2022 to confirm the correct unmetered supply, SAP and registry updated to reflect this. 0007301973NVCDF - arranged contact with customer to confirm unmetered load.	May 2023	
Generation interval data for Maraetai increments in units of 10 kWh with zero decimal places. We will investigate the data consistency with the meter provider and request the necessary amendments.	Ongoing	
ICP 1099569118CN9D3 has been stopped since 2019, but the correction was only conducted for the current customer, which was a five-month period back from 21 March 2022. There was at least 3,600 kWh not accounted for. Investigated and determined this should have been taken from 2019 when the meter was faulty and not current customers timeframe of 21 March 2022.	May 2023	
TRUS		
Some registry discrepancies resulting in submission inaccuracies. Specific comments are included in the relevant sections of this report.	N/A	
ICP 0000702000MP807 unmetered load details corrected post the last audit and this is now outside the 14-month revision cycle. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	June 2023	
Unmetered load details incorrect on the registry and two examples were found where the UNM flag was incorrect and	June 2023	

therefore the unmetered load has not been submitted resulting in a very minor under submission. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.		
Some incorrect active dates. TRUS has updated the CO status of ICP# 0000574440NRF1C to reflect the IED date and installation of NGCM metering on the 15/07/2022. TRUS continues to work with the livening agent and MEPs to have this metering loaded on the to registry.	Ongoing	
Two examples where switch reads were not applied resulting in 237 kWh of over submission for the incorrect period. Agent was advised of issue and given retraining.	May 2023	
Bridged meter corrections not applied for two of a sample of 13 ICPs. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	Jun 2023	
Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	June 2023	
Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	June 2023	
A sample of three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission, resulting in 2,095 kWh under submission per annum. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	June 2023	
ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. This has been corrected. ICP had invoices reversed so an install read and install date could be correctly updated. ICP has been correctly rebilled.	May 2023	
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN		
Some registry discrepancies resulting in submission inaccuracies. N/A	N/A	
Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate. N/A	N/A	
At least eight ICPs have solar generation but submission is not occurring, and notification of gifting has not been provided. Monitor this report more regularly and work with the MEPs and networks to support getting a resolution for some of the older cases I am struggling to get resolved.	Ongoing	
ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum). Restart the unmetered report to find discrepancies, this report was previously stopped when we started utilising the AC Report directly from the registry, but discovered it didn't identify this discrepancy.	May 2023	
Generation interval data for Maraetai increments in units of 10 kWh with zero decimal places. N/A	N/A	
ICP 1099569118CN9D3 has been stopped since 2019, but the correction was only conducted for the current customer, which was a five-month period back from 21 March 2022. There was at least 3,600 kWh not accounted for. Have updated training material to clearly outline that correction should applied from the time the meter was faulty. Reminder provided to all staff.	May 2023	
TRUS		
Some registry discrepancies resulting in submission inaccuracies. N/A	N/A	
ICP 0000702000MP807 unmetered load details corrected post the last audit and this is now outside the 14-month revision cycle. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
Unmetered load details incorrect on the registry and two examples were found where the UNM flag was incorrect and therefore the unmetered load has not been submitted resulting in a very minor under submission. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
Some incorrect active dates. TRUS continues to utilise exception reporting to identify and resolve any discrepancies that occur between GTV and the registry. Additional reporting has been implemented between Audits that will further reduce any discrepancies in dates between the registry and GTV.	Ongoing	

Two examples where switch reads were not applied resulting in 237 kWh of over submission for the incorrect period. Training within the team to ensure everyone knows how to correctly process RR.	May 2023	
Bridged meter corrections not applied for two of a sample of 13 ICPs. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
A sample of three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission, resulting in 2,095 kWh under submission per annum. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. A review of all TRUS ICPs with EG found this is the only instance of this occuring. Updating of billable flags is usually done automatically through metering validations but this was adjusted manually causing the error. Additional training has been completed to minimise this but as it was the only instance we believe current controls minimise risk of this occurring.	May 2023	

Audit trails	
Non-compliance	**Description**
Audit Ref: 2.4 With: Clause 21 Schedule 15.2 From: 01-Jan-22 To: 31-Dec-22	**MEEN** Audit trail not kept where SAP estimates and customer reads are made permanent estimates. Potential impact: Low 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 the audit trails around data gathering, validation and processing functions in SAP as excellent. The non-compliance is around the mass treatment of estimates and customer reads after six months in the SAS system. The audit risk rating is assessed to be low as the impact on market settlement is low.

Actions taken to resolve the issue	Completion date	Remedial action status
We will be reviewing our process on permanent estimates and our treatment of customer and estimated reads, however currently improvement process postponed till further integration with TRUS.	Late 2022/ early 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above.	N/A	

Electrical Connection of Point of Connection			
Non-compliance	**Description**		
Audit Ref: 2.11 With: 10.33A From: 01-Jan-22 To: 17-Nov-22	**MEEN** No MEP nominations were raised for ICPs 0006050069RNDB1 and 0001426079UN6E1, which are active with metering category 9. Four metered new connections had late meter certification of a sample of 20 ICPs checked (from a potential population of 50 ICPs). 20 reconnections of metered ICPs of a sample of 20 ICPs had late meter certification (from a potential population of 135 ICPs). **TRUS** 20 reconnections of metered ICPs of a sample of 20 ICPs had late meter certification (from a potential population of 121 ICPs). One metered newly connected ICP (0110013358EL533) was not certified within five business days of becoming active. 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 rated as moderate as the reporting in place will mitigate risk to an acceptable level but there is a resource constraint that prevents the controls being rated as strong. The audit risk rating is low as volume of ICPs affected is small overall.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**

MEEN **No MEP nominations were raised for ICPs 0006050069RNDB1 and 0001426079UN6E1, which are active with metering category 9.** This has been corrected. **Four metered new connections had late meter certification of a sample of 20 ICPs checked (from a potential population of 50 ICPs).** We are actively working with the MEP and network to correct these ICPs statues **20 reconnections of metered ICPs of a sample of 20 ICPs had late meter certification (from a potential population of 135 ICPs).** We have ensured that a job has been raised for al these ICPs with the MEPs. **TRUS** **20 reconnections of metered ICPs of a sample of 20 ICPs had late meter certification (from a potential population of 121 ICPs).** Current reporting identifies ICPs that have been reconnected without current certification. In almost all instances the MEP is notified of a reconnection on an uncertified site via email. In most cases MEPs do not recertify within 5 business days. **One metered newly connected ICP (0110013358EL533) was not certified within five business days of becoming active.** ICP was identified through current mismatch reporting in the New Connection space that looks at discrepancies between initial connection date, IED and meter cert dates. MEP confirmed ICP was certified late, TRUS unable to do anything to resolve the instance of this issue.	 May 2023 Ongoing May 2023 May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN		
No MEP nominations were raised for ICPs 0006050069RNDB1 and 0001426079UN6E1, which are active with metering category 9. Training with team around Metering changes, and our responsibility to nominate participants.	Ongoing	
Four metered new connections had late meter certification of a sample of 20 ICPs checked (from a potential population of 50 ICPs). We identified this was some issues with our B2B system which was resolved in November 2021, but we appeared to have missed some ICPS that were impacted. There is also some training issues that resulted in these being updated incorrect manually and missed during our validation checks. We will provide training as required to reduce this.	May 2023	
20 reconnections of metered ICPs of a sample of 20 ICPs had late meter certification (from a potential population of 135 ICPs). >Monitor AC report and raise job to recertify meter when status is updated to active on an uncertified site. >The AC report will include sites that were system updated to "active" with no reconnection job, sites that were made “active” during switch in, or status update to “active” as part of the inactive consumption process >We will continue to work with MEPs to improve in late meter certification	May 2023	
TRUS		
20 reconnections of metered ICPs of a sample of 20 ICPs had late meter certification (from a potential population of 121 ICPs). TRUS is comfortable that current reporting is capturing all instances of reconnections on uncertified sites and MEPs are being notified. TRUS continues to engage with MEPs to rectify uncertified sites as the occur.	May 2023	
One metered newly connected ICP (0110013358EL533) was not certified within five business days of becoming active. TRUS has discrepancy reporting that looks at mismatches between initial CO date, IED, and meter cert date. All mismatches are looked into and mismatches are corrected where possible. TRUS is comfortable current reporting is robust enough and captures all instances of mismatches between dates.	May 2023	

Meter bridging			
Non-compliance	**Description**		
Audit Ref: 2.17 With: Clause 10.33C and 2A of Schedule 15.2 From: 15-Jan-22 To: 08-Jul-22	**TRUS** Corrections not conducted for two ICPs where meters were bridged. 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 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 acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.		June 2023	Investigating
Preventative actions taken to ensure no further issues will occur		**Completion date**	
Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.		June 2023	

Changes to registry information	
Non-compliance	**Description**
Audit Ref: 3.3 With: Clause 10 of schedule 11.1 From: 01-Jan-22 To: 17-Nov-22	**MEEN** 727 late reconnection updates. 340 late disconnection updates. 41,066 late trader updates. 277 ICPs did not have ANZSIC codes populated within 20 business days of switching in, or initial electrical connection. **TRUS** 512 late reconnection updates. 472 late disconnection updates. 1760 late trader updates. 79 ICPs did not have ANZSIC codes populated within 20 business days of switching in, or initial electrical connection. 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 they mitigate risk most of the time. 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

MEEN **727 late reconnection updates.** >Mid 2022 we implemented an SAP change where a reconnection raised on a site that was previously disconnected by Mercury will automatically update the previous disconnection service order and where possible, automatically update status to active. >SAP auto updates/system issues from previous audit is now being monitored via exception email which will allow us to investigate as soon as the status is updated >Sites which switch in with "inactive" status will be investigated via Inactive consumption report, implemented mid 2022 >Any reconnection that is missed in our current processes should be picked up in the Inactive consumption report for investigation **340 late disconnection updates.** No action required as it's a late update - refer to preventive action **41,066 late trader updates.** There will be some form of late trader updates, like meter change which was completed but not notified to retailer until later date so MEP nomination has to be back dated which causes late trader updates or disconnection/reconnection paperwork delayed causing status to be updated late. **277 ICPs did not have ANZSIC codes populated within 20 business days of switching in, or initial electrical connection.** We are running our ANZSIC reporting on a weekly as well as using the AC report to pick up ANZSIC issues that requires attention and update. **TRUS** **512 late reconnection updates.** **472 late disconnection updates.** **1760 late trader updates.** TRUS continues to engage with third parties e.g. MEPs and Networks to try and reduce the number of late updates across reconnections, disconnections and trader updates impacted by late updates/job closures on their part. TRUS continues to monitor a number of reports to identify any gaps in our processes or current reporting to ensure all updates are made in as timely fashion as possible. **79 ICPs did not have ANZSIC codes populated within 20 business days of switching in, or initial electrical connection.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 N/A May 2023 May 2023 Ongoing June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN		
727 late reconnection updates. Staff Training has been administered so any site that is reconnected via email (system exceptions), will manually be updated to active	November 2022	
340 late disconnection updates. Increase frequency checks on exceptions so the status is updated in a more timely manner. Follow up on incomplete jobs earlier, with relevant contractors and/or MEPs	May 2023	
41,066 late trader updates. Remind all staff about updating timeslices going forward where possible rather than altering old time slices which causes late trader updates.	May 2023	
277 ICPs did not have ANZSIC codes populated within 20 business days of switching in, or initial electrical connection. We will continue to run our ANZSIC report as well as use to AC report to update incorrect or missing ANZSIC codes.	May 2023	
TRUS		
512 late reconnection updates.	Ongoing	
472 late disconnection updates.		
1760 late trader updates.		
TRUS continues to engage with third parties around late updates that impact our ability to update Trader owned fields in a timely manner. Conversations with IHUB specifically continue around the ongoing issue of alternate MEP metering being installed causing late MEP nominations.		
79 ICPs did not have ANZSIC codes populated within 20 business days of switching in, or initial electrical connection. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	

Trader responsibility for an ICP	
Non-compliance	**Description**
Audit Ref: 3.4 With: Clause 11.18 From: 01-Jan-22 To: 17-Nov-22	**MEEN** 5 (0.05%) of the 9,459 MEP nominations identified on the event detail report were issued to the wrong MEP and rejected. ICP 1100000219WM256's MEP nomination was not issued and accepted within 14 business days of initial electrical connection. **TRUS** One invalid MEP nomination was sent. 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 strong, as the improved reporting in place will mitigate risk to an acceptable level. The audit risk rating is assessed to be low as the as the volume of invalid MEP nominations was very small and the correct MEP was subsequently nominated.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN **5 (0.05%) of the 9,459 MEP nominations identified on the event detail report were issued to the wrong MEP and rejected.** We believe our current process is strong and we do have a spreadsheet that we use to monitor any MEP rejections to ensure that these are resolved quickly. **ICP 1100000219WM256's MEP nomination was not issued and accepted within 14 business days of initial electrical connection.** Based on investigation this seems to be a human-error mistake that missed doing the MEP nomination when issuing out the new connection. **TRUS** **One invalid MEP nomination was sent.** ICP was identified via reporting however no action was taken as MEP nomination was raised in error. Rejected MEP nomination was reversed during Audit.	May 2023 May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN **5 (0.05%) of the 9,459 MEP nominations identified on the event detail report were issued to the wrong MEP and rejected.** Continue to use the MEP rejection report, will require to be updated as we move away from SAP. **ICP 1100000219WM256's MEP nomination was not issued and accepted within 14 business days of initial electrical connection.** Further training provided to avoid human-error mistakes **TRUS** **One invalid MEP nomination was sent.** Reporting around rejected MEP nominations runs daily and delivers whenever there are results. Additional training has been completed to ensure any results are correctly actioned, including where MEP nominations are raised incorrectly.	May 2023 May 2023 May 2023	

Provision of information to the registry manager	
Non-compliance	**Description**
Audit Ref: 3.5 With: Clause 9 of schedule 11.1 From: 17-Mar-21 To: 31-Mar-23	**MEEN** Alleged breach 2209MERC2. 947 late updates to "active" status for new connections. 12 late MEP nominations for new connections. Nine ICPs had incorrect "active" status event dates. Two were corrected during the audit and seven remain incorrect. **TRUS** 661 late updates to "active" status for new connections. 28 late MEP nominations for new connections. 11 new ICPs had incorrect "active" status dates of the sample of 29 new connections checked. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	For MEEN controls are rated as moderate as there is some room for improvement, especially to the timeliness of new connection updates. For TRUS controls are rated as strong as the reporting in place mitigates risk to an acceptable level and identifies potential "active" date discrepancies with robust processes to investigate these as they are identified. Overall the controls are rated as moderate. The audit risk rating is low as most new connections were on time and processed from the correct date. TRUS' processes ensure that ICPs are made "active" for the correct date.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN **Alleged breach 2209MERC2.** Full details in the breach response. The majority of the late status updates were due to delays in receiving the relevant paperwork from the MEP. The Authority noted the breach caused low market and minor operational impact. The Authority decided to take no further action on the breach under regulation 11(1)(c) of the Electricity Industry (Enforcement) Regulations 2010 (Regulations). **947 late updates to "active" status for new connections.** After B2B was implimented we didn't pick up an issue in that if the ICP status was NEW then B2B didn't change the status to 001/12, so it was only updating the status to this when the job was completed causing issues with the incorrect status and dates as we had to then manually update to active from the correct date. **12 late MEP nominations for new connections.** Based on investigation this seems to be a human-error mistake that missed doing the MEP nomination when issuing out the new connection. **Nine ICPs had incorrect "active" status event dates. Two were corrected during the audit and seven remain incorrect.** We are actively working with the MEP and network to correct these ICPs statues **TRUS** **661 late updates to "active" status for new connections.** **28 late MEP nominations for new connections.** **11 new ICPs had incorrect "active" status dates of the sample of 29 new connections checked.** TRUS has robust reporting across the New Connections processes. Reports are delivered and worked daily to identify all sites with date mismatches between first active date, IED and meter certification date. Reporting introduced after previous audit created a need for some further backdated corrections which are reflected in this audit, reporting is now up to date and worked as discrepancies arise.	December 2022 November 2021 May 2023 Ongoing May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN		
Alleged breach 2209MERC2. To mitigate delays caused by paperwork not being received for jobs, we have started to use validations from our meter readings team to help us to identify these sites earlier and take prompt action to query with the MEP.	September 2022	
947 late updates to "active" status for new connections. We updated the B2B process to not allow the job to be issued if the ICP status was sitting as NEW, so team have to wait for ICP status to be READY to allow the correct status updates to flow through as job is issued and then completed.	November 2021	
12 late MEP nominations for new connections. Further training provided to avoid human-error mistakes	May 2023	
Nine ICPs had incorrect "active" status event dates. Two were corrected during the audit and seven remain incorrect. There is an existing reporting in the GTV space, as we do not currently report on this in SAP	May 2023	
TRUS		
661 late updates to "active" status for new connections.	Ongoing	
28 late MEP nominations for new connections.		
11 new ICPs had incorrect "active" status dates of the sample of 29 new connections checked.		
TRUS will continue to utilise exception and discrepancy reporting to identify any gaps in our processes and ensure all updates are made in as timely a fashion as possible. TRUS will continue to engage with third parties where needed to minimise impacts from late updates by third parties e.g. MEPs/Networks.		

ANZSIC codes	
Non-compliance	**Description**
Audit Ref: 3.6 With: 9 (1(k) of Schedule 11.1 From: 01-Jan-22 To: 31-Mar-23	**MEEN** 2,978 ICPs with T994 ANZSIC codes. A sample of 30 ICPs were checked and corrected to residential ANZSIC codes before or during the audit. One meter category three ICP had a residential ANZSIC code assigned in error and was corrected during the audit. Six category two meters of a sample of 20 ICPs had a residential ANZSIC code assigned in error and were corrected during the audit. Nine of a sample of 80 "active" ICPs had incorrect ANZSIC codes assigned and were corrected during the audit. **TRUS** One category 2 ICP with a residential ANZSIC code applied. Four ICPs of the 80 ICPs sampled with an incorrect ANZSIC code applied. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	For MEEN controls are rated as moderate because of the relatively high number of T994 ANZSIC codes. For TRUS controls are rated as strong as controls are robust. Overall the controls are assessed to be moderate. This has no direct impact on reconciliation therefore the audit risk rating is low. There is an impact on reporting by the Electricity Authority.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN As per above, we will continue to run the ANZSIC report as well as use the AC report to correct any ANZSIC code that requires updating/correcting. Currently there are a lot of ICP's on the AC report which requires investigating and updating to correct ANZSIC. Resources issues at times make it challanging to get these done before the new AC report comes through but always update as much as possible. The number of ICP's should gradually come down as we continue to work on it. With regards to the meter category, we dont have any reporting to pick these up on our end but there is a bit of information on the AC report we can use. **TRUS** **One category 2 ICP with a residential ANZSIC code applied.** **Four ICPs of the 80 ICPs sampled with an incorrect ANZSIC code applied.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN We will review the reporting post integration regarding the meter category. **TRUS** **One category 2 ICP with a residential ANZSIC code applied.** **Four ICPs of the 80 ICPs sampled with an incorrect ANZSIC code applied.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	May 2023 June 2023	

Changes to unmetered load	
Non-compliance	**Description**
Audit Ref: 3.7 With: Clause 9(1)(f) of Schedule 11.1 From: 01-Jan-22 To: 17-Nov-22	**MEEN** DUML ICP 0000043663HR00F has its UNM flag set to N but should have its UNM flag set to Y. No MEP nominations were raised for ICPs 0006050069RNDB1 and 0001426079UN6E1, which are "active" with metering category 9. Three ICPs missed having shared unmetered load re-added when users processed meter changes and were corrected during the audit. Ten ICPs with no unmetered load recorded by the distributor had incorrect trader unmetered load information and were corrected during the audit. ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum). 15 DUML ICPs which had the unmetered flag set to no, and a blank unmetered daily kWh. 14 were corrected during the audit and DUML ICP 0000043663HR00F remains incorrect. **TRUS** 27 ICPs had an incorrect daily unmetered kWh value recorded on the registry. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as weak because: • MEEN's validation processes require improvement to ensure that unmetered load information is consistently accurate, and • TRUS has had changes of staff and training is planned to bring the new team up to speed. The impact on settlement and participants is minor, as the discrepancies are small.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN All necessary fixes and corrections in the registry have been made. **TRUS** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN		
DUML ICP 0000043663HR00F has its UNM flag set to N but should have its UNM flag set to Y. Further training with team around DUML sites	Ongoing	
No MEP nominations were raised for ICPs 0006050069RNDB1 and 0001426079UN6E1, which are "active" with metering category 9. Training with team around Metering changes, and our responsibility to nominate participants	Ongoing	
Three ICPs missed having shared unmetered load re-added when users processed meter changes and were corrected during the audit. Further training with team around DUML sites	Ongoing	
Ten ICPs with no unmetered load recorded by the distributor had incorrect trader unmetered load information and were corrected during the audit. Further training with team around DUML sites.	Ongoing	
ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum). Monitor going forward.	Ongoing	
15 DUML ICPs which had the unmetered flag set to no, and a blank unmetered daily kWh. 14 were corrected during the audit and DUML ICP 0000043663HR00F remains incorrect. Further training with team around DUML sites	Ongoing	
TRUS		
27 ICPs had an incorrect daily unmetered kWh value recorded on the registry. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	

Management of "active" status	
Non-compliance	**Description**
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 01-Jan-22 To: 31-Mar-23	**MEEN** Ten new connections had incorrect "active" status dates. Three were corrected during the audit and seven remain incorrect. **TRUS** Ten new ICPs had the incorrect "active" status dates of the samples checked. All but one have since been corrected. ICP 0001853487ALE7F reconnected on 31 July 2019 but updated to "active" from 1 August 2019. 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. 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
MEEN We are actively working with the MEP and network to correct these ICPs statues. **TRUS** **Ten new ICPs had the incorrect "active" status dates of the samples checked. All but one have since been corrected. ICP 0001853487ALE7F reconnected on 31 July 2019 but updated to "active" from 1 August 2019.** All ICPs with incorrect active status dates identified have been corrected excluding the one ICP identified within the report. This ICP is outside of the submission period so any correction will not impact reconciliation for either retailer.	Ongoing May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN There is existing reporting in the GTV space, as we do not currently report on this in SAP. **TRUS** **Ten new ICPs had the incorrect "active" status dates of the samples checked. All but one have since been corrected. ICP 0001853487ALE7F reconnected on 31 July 2019 but updated to "active" from 1 August 2019.** Changes have been made to processes around reporting that looks at where CO statuses have failed to update due to TRUS not being the retailer at the time of the reconnection. ICPs identified to be reconnected prior to TRUS being the retailer will now be re-requested for the date of the reconnection.	Late-2023 May 2023	

Management of "inactive" status	
Non-compliance	**Description**
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 01-Jan-22 To: 17-Nov-22	**MEEN** Two ICPs had incorrect "inactive" status dates and were corrected during the audit. **TRUS** Two ICPs with incorrect inactive events applied. Two ICPs where inactive consumption was not included in the submission process resulting in an under submission of 27 kWh. Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process. Potential impact: Low Actual impact: Low Audit history: Multiple 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 most of the time. There is no impact on settlement as the volume impact to the submission process is minor.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**

MEEN These were identified during the audit and corrected at the time and auditor informed of this. **TRUS** **Two ICPs with incorrect inactive events applied.** Both ICPs identified within the audit as having the incorrect inactive event date have been corrected. **Two ICPs where inactive consumption was not included in the submission process resulting in an under submission of 27 kWh.** **Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	March 2023 May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN We have had an increase in headcount within team since 2022 to help manage the volume for reporting for inactive sites. **TRUS** **Two ICPs with incorrect inactive events applied.** ICP 0110012486EL548 was incorrectly updated after being identified through new reporting that was implemented after the previous audit. The New Connections team is now experienced with this report and understand the process required to correctly work these discrepancies. This is backed up by only a single issue having been identified. **Two ICPs where inactive consumption was not included in the submission process resulting in an under submission of 27 kWh.** **Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	February 2023 May 2023 June 2023	

Inform registry of switch request for ICPs - standard switch	
Non-compliance	**Description**
Audit Ref: 4.1 With: Clause 2 of schedule 11.3 From: 22-Oct-22 To: 25-Oct-22	**TRUS** One ICP loaded as a transfer switch in error. 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 as processes in place are robust and training is comprehensive. This was a one-off human error. The risk rating is assessed to be low to none as the losing trader can request a switch withdrawal if required.

Actions taken to resolve the issue	Completion date	Remedial action status
Training was undertaken to prevent agent from making the same error in the future.	May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Refresher training with Contact Centre, further comms to go out to Contact Centre, updated with Training team to ensure new inductees are trained correctly.	May 2023	

Losing trader response to switch request and event dates - standard switch	
Non-compliance	**Description**
Audit Ref: 4.2 With: Clauses 3 & 4 of schedule 11.3 From: 16-Mar-22 To: 16-Nov-22	**MEEN** Five of a sample of 46 transfer AN files with the AA response code checked contained incorrect response code. **TRUS** One of a sample of 22 AN files checked contained incorrect response code of AA. Three ANs had proposed event dates more than ten business days after NT receipt. Potential impact: None Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as moderate for MEEN because SAP sometimes applies the AA code incorrectly for ICPs which are disconnected or have AMI metering installed. The controls are rated as strong for TRUS as AN code assignment is automated based on hierarchy and the AN proposed dates process is robust. Controls are assessed to be strong overall, based on the number of exceptions identified as a proportion of those checked. The impact is assessed as low as there is no material impact on reconciliation or other participants.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN Team has been refreshed via training on assigning AN code. **TRUS** **One of a sample of 22 AN files checked contained incorrect response code of AA.** Training was undertaken to prevent agent from making the same error in the future. Documention was also reviewed to ensure accuracy. **Three ANs had proposed event dates more than ten business days after NT receipt.** Corrected as part of CS process.	May 2023 May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS** **One of a sample of 22 AN files checked contained incorrect response code of AA.** Full team training session to be held to ensure everyone understands and completes process correctly. **Three ANs had proposed event dates more than ten business days after NT receipt.** Reporting already in place.	May 2023 June 2023 N/A	

Losing trader must provide final information - standard switch	
Non-compliance	**Description**
Audit Ref: 4.3 With: Clause 5 of schedule 11.3 From: 03-Dec-21 To: 17-Nov-22	**MEEN** 11 CS breaches. The CS average daily kWh will be incorrect if the ICP has less than two validated readings in the last six months, or the file is generated manually. Ten CS files checked had incorrect average daily kWh applied because of this. Six CS files had incorrect last actual read dates. One manually created CS file had an incorrect event read and event read type and was later withdrawn. **TRUS** Four WR breaches. Seven CS files sent with the incorrect last actual read date. Six due to human error and one system (ICP 0000492310WPEB5) generated error. 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 moderate. • For MEEN the logic to create the average daily kWh and last actual read date is not consistent with the Registry Functional Specification and will result in incorrect values being applied under certain circumstances. In most cases, CS content will be correct and files will be issued on time. Processes for ICPs supplied for short periods have improved during the audit period. • For TRUS some of the processes are manual and so more open to errors occurring. The audit risk rating is assessed to be low, because: • last actual read dates do not have a direct impact on reconciliation, • the CS file containing incorrect event readings was withdrawn, • most ICPs switching out will have two validated readings within the last six months, and in these cases SAP's average daily kWh calculation will be consistent with the registry functional specification, and • there were a small number of late CS files which were 6-18 days overdue because MEEN had applied the gaining trader's backdated requested transfer date.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN Team has been given a refresher via training on assigning AN code if has to be completed manually. In the light of integration and Mercury moving to GTV system, we recommend not raising a ticket to address the issue. **TRUS** **Four WR breaches.** Daily registry checks now include WR check so they are not missed. **Seven CS files sent with the incorrect last actual read date. Six due to human error and one system (ICP 0000492310WPEB5) generated error.** Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023 Pre-audit after first breach May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS** **Four WR breaches.** BI report now in place for rejected withdrawals. This is auto delivered to group email. **Seven CS files sent with the incorrect last actual read date. Six due to human error and one system (ICP 0000492310WPEB5) generated error.** Full team training session to be held to ensure everyone understands and completes process correctly.	N/A Pre-audit June 2023	

Retailers must use same reading - standard switch	
Non-compliance	**Description**
Audit Ref: 4.4 With: Clauses 6(1) and 6A Schedule 11.3 From: 06-Apr-22 To: 13-Oct-22	**MEEN** Four RR breaches. Seven of the ten RRs checked had an actual read type applied in SAP instead of an estimate. **TRUS** Three RR breaches. The read for one accepted RR not applied in GTV. Estimated CS read not used and no RR issued for ICP 0000062604TR22A resulting in an estimated 238 kWh of over submission for the incorrect period. 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	Controls are recorded as moderate: • for MEEN RR content was correct, most files were on time and read values were correctly recorded, but some read types were incorrectly entered in SAP on manual entry, and • for TRUS the controls will mitigate risk most of the time but there is room for improvement. The audit risk rating is low but has the potential of a medium if estimated reads are not used and no RRs are issued.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**

MEEN This was identified as a system issue in SAP. Setting up of accounts upon switch completion is semi-automated - we have taken this opportunity to recheck the read entered and alter it if has been changed to Actual. **TRUS** **Three RR breaches.** **The read for one accepted RR not applied in GTV.** Training was undertaken to prevent agent from making the same error in the future. Documention was also reviewed to ensure accuracy. **Estimated CS read not used and no RR issued for ICP 0000062604TR22A resulting in an estimated 238 kWh of over submission for the incorrect period.** Training was undertaken to prevent agent from making the same error in the future. Documention was also reviewed to ensure accuracy.	May 2023 May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN As above. **TRUS** **Three RR breaches.** **The read for one accepted RR not applied in GTV.** Full team training session to be held to ensure everyone knows how to correctly process RR. **Estimated CS read not used and no RR issued for ICP 0000062604TR22A resulting in an estimated 238 kWh of over submission for the incorrect period.** Training within the team to ensure everyone knows how to correctly process RR.	N/A May 2023 May 2023	

Non-half hour switch event meter reading - standard switch	
Non-compliance	**Description**
Audit Ref: 4.5 With: Clauses 6(2) and (3) Schedule 11.3 From: 26-Oct-22 To: 01-Nov-22	**TRUS** One RR incorrectly rejected. 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 strong and will mitigate risk to an acceptable level. The audit risk rating is low as this will have a minor effect on submission accuracy.

Actions taken to resolve the issue	Completion date	Remedial action status
Had to reject completion of RR on our gain before RR on our loss could be accepted.	May 2023	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Nothing can be done to prevent this as only one RR can be actioned at any given time.	N/A	

Gaining trader informs registry of switch request - switch move	
Non-compliance	**Description**
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 16-Oct-21 To: 27-Aug-22	**MEEN** Switch move is also applied for any ICP switching to MEEN from GBUG where GBUG has switched the ICP in and then discovered they cannot supply it. 11 ICPs switching from GBUG had switch move applied when no customer was moving in on the switch event date. 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 strong because correct switch types are applied for most ICPs. The non-compliance affects a small subset of switches between Mercury Energy's participant codes. The impact is low. Use of the MI switch type ensures that switch event dates are correctly applied.

Actions taken to resolve the issue	Completion date	Remedial action status
These are GBUG Turndowns and are always created as Move Switches as site need to be switched to MEEN from GBUG gains date + one day. There is no change required here.	N/A	Disputed
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above.	N/A	

Losing trader provides information - switch move	
Non-compliance	**Description**
Audit Ref: 4.8 With: Clause 10 of schedule 11.3 From: 18-Dec-21 To: 14-Nov-22	**MEEN** Eight of a sample of 63 move switch AN file with the AA response code checked contained the incorrect response code. Four AN breaches. 12 WR breaches. 137 T2 breaches. **TRUS** Five of a sample of six move switch AN file with the AA response code checked contained the incorrect response code. All five move switch AN files sample with the OC response code checked contained the incorrect response code. One AN had a proposed event date more than ten business days of NT receipt. Two E2 breaches Four WR breaches. Two T2 breaches. 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 rated as moderate: • for MEEN SAP sometimes applies the AA code incorrectly for ICPs which are disconnected or have AMI metering installed, and some AN and CS files were late, and • for TRUS the move switch process has more manual processes than transfer switches which results in more human errors. The impact is assessed as low the number of late and incorrect files were minimal. The late files were sent soon after the due date.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN Team has been given a refresher on assigning AN code if it has to be completed manually. In the light of integration and Mercury moving to GTV system, we recommend not raising a ticket to address the issue.	May 2023	Identified
TRUS **Five of a sample of six move switch AN file with the AA response code checked contained the incorrect response code.** Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023	
All five move switch AN files sample with the OC response code checked contained the incorrect response code. Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023	
One AN had a proposed event date more than ten business days of NT receipt. **Two E2 breaches** Human Error but corrected as part of CS process. Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023	
Four WR breaches. **Two T2 breaches.** Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy	May 2023	
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS** **Five of a sample of six move switch AN file with the AA response code checked contained the incorrect response code.** Full team training session to be held to ensure everyone is processing task correctly. **All five move switch AN files sample with the OC response code checked contained the incorrect response code.** Full team training session to be held to ensure everyone is processing task correctly. **One AN had a proposed event date more than ten business days of NT receipt.** **Two E2 breaches** Reporting already in place. Full team training session to be held to ensure everyone is processing task correctly. **Four WR breaches.** **Two T2 breaches.** Full team training session to be held to ensure everyone is processing task correctly.	N/A June 2023. June 2023 June 2023 June 2023	

Losing trader must provide final information - switch move	
Non-compliance	**Description**
Audit Ref: 4.10 With: Clause 11 of schedule 11.3 From: 29-Dec-21 To: 21-Oct-22	**MEEN** The CS average daily kWh will be incorrect if the ICP has less than two validated readings in the last six months, or the file is generated manually. 23 ICPs checked had incorrect average daily kWh applied because of this. Three CS files had incorrect switch event read types. Six CS files had incorrect last actual read dates. Two CS files for ICPs supplied for brief periods contained information for MEEN's last period of supply because the incoming CS had not been processed, and were later withdrawn. **TRUS** Two incorrect high daily consumption values sent. All three sampled of a possible 43 CS files sent with an actual read from the event date incorrectly labelled as an estimated read. All five sampled of a possible 38 CS files were sent with either an incorrect read date (four instances) or one ICP was sent with an estimated read rather than the last actual read. Three of a possible nine CS files were sent with the incorrect last read date. Five sampled of a possible 20 CS files were sent with the incorrect last actual read date. 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	I have rated the controls moderate: • for MEEN the logic to create the average daily kWh and last actual read date is not consistent with the Registry Functional Specification and will result in incorrect values being applied under certain circumstances, in most cases, CS content will be correct and processes for ICPs supplied for short periods have improved during the audit period, and • for TRUS risks are mitigated most of the time but there is room for improvement. The audit risk rating is assessed to be low, because: • last actual read dates do not have a direct impact on reconciliation, • the CS files containing incorrect event readings were withdrawn, • most ICPs switching out will have two validated readings within the last six months, and in these cases SAP's average daily kWh calculation will be consistent with the registry functional specification, and • the number of CS files affected is still relatively low in relation to the volume of switches processed.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN Team has been given a refresher on the CS content if it has to be completed manually. In the light of integration and Mercury moving to GTV system, we recommend not raising a ticket to address the issue. **TRUS** Full team training session held to ensure everyone is processing task correctly.	May 2023 March 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN As above. **TRUS** Full team training session held to ensure everyone is processing task correctly.	N/A March 2023	

Gaining trader changes to switch meter reading - switch move	
Non-compliance	**Description**
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 20-Jan-22 To: 17-Nov-22	**MEEN** Six of the ten RRs checked had an actual read type applied in SAP instead of estimate. For one manually created RR, the read was not updated at all on receipt of the AC. 34 RR breaches. Five AC breaches. **TRUS** 28 RR breaches. 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	Controls are recorded as moderate: • for MEEN, RR content was correct, most files were on time and almost all read values were correctly recorded but some read types were incorrectly entered in SAP on manual entry, and one AC was not processed in SAP, and • for TRUS the controls will mitigate risk most of the time but there is room for improvement as identified in **section 4.4**. The audit risk rating is low because the number of RRs issued is small. The incorrect read types have no impact on reconciliation and the missed AC file will result in over submission of 4 kWh. The late RRs were sent as soon as possible so that submission could be corrected.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN This was identified as a system issue in SAP. Setting up of accounts upon switch completion is semi-automated- we have taken this opportunity to recheck the read entered and alter it if has been changed to Actual. **TRUS** Causes identified as access issues. Approval required TL prior to submission.	May 2023 N/A	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS** Not directly in Energy Provisioning control.	N/A N/A	

Gaining trader informs registry of switch request - gaining trader switch			
Non-compliance	**Description**		
Audit Ref: 4.12 With: Clause 14 of Schedule 11.3 From: 10-Jan-22 To: 10-Jan-22	**MEEN** One ICP with category 2 metering was requested as a HH switch. 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 the incorrect switch type was an isolated data entry error and the other 32,312 NTs checked had a switch type consistent with the metering category. The impact is low because both traders settled the category 2 ICP as HH.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**
Identified as a mistake while bulk uploading Switch NTs.		May 2023	Identified
Preventative actions taken to ensure no further issues will occur		**Completion date**	
Refresher training on switching types by Category and reinforce care with bulk uploads.		Ongoing	

Losing trader provision of information - gaining trader switch	
Non-compliance	**Description**
Audit Ref: 4.13 With: Clause 14 of Schedule 11.3 From: 24-Jan-22 To: 01-Aug-22	**TRUS** Five HH ANs were issued with the MU (unmetered supply) response code when they were metered, and no unmetered load was connected. 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 as HH TOU ICPs are no longer traded by TRUS. The potential impact is low as this has no material impact on reconciliation.

Actions taken to resolve the issue	Completion date	Remedial action status
Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
No longer relevant as TRUS does not have HHR sites anymore.	October 2021	

Withdrawal of switch requests	
Non-compliance	**Description**
Audit Ref: 4.15 With: Clauses 17 & 18 of schedule 11.3 From: 03-Dec-21 To: 17-Nov-22	**MEEN** Four NWs contained some incorrect content and were rejected. One incoming NW was rejected in error and accepted on reissue by the other trader. Two NW breaches. 34 AW breaches. **TRUS** 50 NA breaches. 13 SR breaches. Seven incorrect NW codes found in the sample of 35 checked. 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	I have rated the controls as moderate: • for MEEN due to the complexity of these types of withdrawals there are some late switch withdrawals and acceptances; a small number of NWs and AWs contained incorrect content due to confusion about whether the NW was required and/or the correct code, and • for TRUS the controls will mitigate risk most of the time but there is room for improvement, specifically in the application of NW codes. The audit risk rating is low as the volume of backdated switch withdrawals is low in relation to the overall volume of switches processed and the processing of these increases the submission accuracy. The NW files with incorrect advisory codes were rejected, and the invalidly rejected incoming NW was accepted on reissue. 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**

MEEN We have reviewed our breach report and will now be worked on day 2 to avoid any system/technical issue leading to breach. **TRUS** **50 NA breaches.** Unavoidable if wrong property identified outside of timeframe. **13 SR breaches.** Unavoidable if further investigation is required and the alt has rejected initial NW. **Seven incorrect NW codes found in the sample of 35 checked.** Robust discussion had with auditors regarding use of NW codes. Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023 May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN As above. **TRUS** **50 NA breaches.** Refresher training with contact centre, further comms to go out to contact centre, updated with training team for new inductees. **13 SR breaches.** Auditor found nothing wrong. Found they were late due the time required to investigate and confirm the withdrawal. **Seven incorrect NW codes found in the sample of 35 checked.** Robust discussion had with auditors regarding use of NW codes. Training to be undertaken and documentation updated.	N/A May 2023 May 2023 June 2023	

Metering information	
Non-compliance	**Description**
Audit Ref: 4.16 With: Clause 21 of schedule 11.3 From: 03-Dec-21 To: 17-Nov-22	**MEEN** Three CS files had incorrect switch event read types. Three CS files had incorrect switch event read information and were later withdrawn. **TRUS** All three sampled of a possible 43 MI CS files sent with an actual read from the event date incorrectly labelled as an estimated read. 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 rated as moderate for MEEN. In most cases, CS content will be correct. Processes for ICPs supplied for short periods have improved during the audit period. The controls are rated as moderate for TRUS and will mitigate risk most of the time but there is room for improvement. The audit risk rating is assessed to be low, because: • the CS files containing incorrect event readings were withdrawn, • incorrect CS event read types for transfer switches could have a minor impact on other participants if they wish to renegotiate an event read under Clause 6(2) and (3) Schedule 11.3, and • the number of CS files affected is still relatively low in relation to the volume of switches processed.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN Team has been refreshed on CS content requirements. **TRUS** Investigation being undertaken to confirm if human error or system error. (sections 4.10, 4.16, 6.7 and 9.1)	May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN As above. **TRUS** Confirming the logic to ensure correct read is picked up and used in CS file.	N/A July 2023	

Switch protection	
Non-compliance	**Description**
Audit Ref: 4.17 With: Clause 11.15AA to 11.15AB From: 08-Apr-22 To: 08-Apr-22	**MEEN** Alleged breach 2205MER1 for contacting a customer during the switch protected period and offering an enticement. 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. All agents are trained on when enticements may be offered and this appears to be an isolated occurrence. The impact is assessed to be low, and MEEN has taken action to prevent recurrence and compensated the other trader.

Actions taken to resolve the issue	Completion date	Remedial action status
On the morning of 8 April 2022, a Mercury customer signed up with Power Edge Limited. On the same morning, the customer contacted Mercury to advise that they were switching out. This was unprompted by Mercury; the customer assumed that they needed to inform Mercury as part of the process of switching out. Without clear invitation from the customer, the Mercury agent offered the customer an enticement to stay with Mercury which the customer accepted. Power Edge Limited accepted Mercury's withdrawal notice and the customer has remained with Mercury. We acknowledge that under the circumstances Power Edge Limited had little choice as it would be extremely difficult for them to re-win the customer. We have apologised to Power Edge Limited and have agreed on a credit as a one-off goodwill gesture to resolve.	May 2022	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Mercury has robust processes and training programmes in place to ensure that all staff are aware of our requirements under the Code. Human error has occurred in this instance; we have spoken to the agent in question and provided them with additional training. We have reviewed internally and have reminded all our agents of the rules around win-backs and the Switch Protected Period and are confident that we will not see a recurrence of this issue.	May 2022	

Maintaining shared unmetered load	
Non-compliance	**Description**
Audit Ref: 5.1 With: Clause 11.14 From: 19-Jun-21 To: 01-Mar-23	**MEEN** Three ICPs missed having shared unmetered load re-added when users processed meter changes and were corrected during the audit. **TRUS** Two ICPs with shared unmetered load indicated but no value recorded on the registry. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as weak: • for MEEN the validation processes require improvement to ensure that unmetered load information is consistently accurate, and • for TRUS there have been changes of staff, and training is planned to bring the new team up to speed. The impact on settlement and participants is minor, as the discrepancies are small.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN The unmetered section isn't brought across if the meter is replaced in SAP using the B2B system, so this would normally be picked up and added as required during our validation checks. This is a training issue due to a loss of our main resource in this space and not able to do a full handover with their replacement. **TRUS** **Two ICPs with shared unmetered load indicated but no value recorded on the registry.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN Further training has been provided to ensure the validation checks are being done correctly to pick up when areas are unable to be updated using B2B. **TRUS** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	May 2023 June 2023	

Distributed unmetered load			
Non-compliance	**Description**		
Audit Ref: 5.4 With: Clauses 11(1) of schedule 15.3, 10.14 & 15.13 From: 01-Mar-22 To: 31-Mar-23	**MEEN** Inaccurate submission information for several databases. One database audit report outstanding. Potential impact: High Actual impact: High Audit history: Multiple Controls: Moderate Breach risk rating: 6		
Audit risk rating	**Rationale for audit risk rating**		
High	The controls are rated as moderate as Mercury are working with the customers to improve the level of accuracy. The impact is assessed to be high, based on the kWh differences found in the DUML audits.		
Actions taken to resolve the issue		**Completion date**	**Remedial action status**
Regular DUML audits are carried out and we continue to work with customers to ensure that the DUML databases are accurate. For the two databases highlighted in the table above: Carterton DC - we are awaiting the outcome of the most recent audit (due 1 June 2023) but the feedback we have received is that the field audit was accurate and no major issues have been identified. We will work with CDC to correct the database and carry out a washup. Palmerston North CC - The most recent DUML audit (completed March 2023) found that the majority of wattages have been corrected and a process is in place to account for dimming using golden meter usage.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		**Completion date**	

As above	N/A	

Electricity conveyed & notification by embedded generators	
Non-compliance	**Description**
Audit Ref: 6.1 With: Clause 10.13 From: 01-Jan-22 To: 31-Mar-23	**MEEN** While meters were bridged, energy was not metered and quantified according to the code for five ICPs. Some ICPs with distributed generation not quantified. **TRUS** While meters were bridged, energy was not metered and quantified according to the code for 58 ICPs. ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. 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	Controls are rated as moderate as they are sufficient to reduce the risk most of the time. Submission information is estimated for the bridged period in most cases, so the impact on submission accuracy is considered low and the volume of unaccounted for distributed generation is expected to be low.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN **While meters were bridged, energy was not metered and quantified according to the code for five ICPs.** Investigating, according to our records all bridged meter corrections were correct. **Some ICPs with distributed generation not quantified.** We have a running report of any sites that have suspected generation, these come from MEPs with reverse power and Installation type being changed to B. This is reviewed on a infrequent basis. The process is to do an internal investigation to see if we can confirm solar, if not arrange contact with customer to discuss the process to get an IMP/EXP meter on site. Some limitation of customers not responding. **TRUS** **While meters were bridged, energy was not metered and quantified according to the code for 58 ICPs.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve. **ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present.** This has been corrected. ICP had invoices reversed so an install read and install date could be correctly updated. ICP has been correctly rebilled.	Ongoing Ongoing June 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN **While meters were bridged, energy was not metered and quantified according to the code for five ICPs.** As above. **Some ICPs with distributed generation not quantified.** Base process is working well but requires more resource to monitor this on a more regular basis. Also some support from networks and MEPs to help with the more difficult cases. **TRUS** **While meters were bridged, energy was not metered and quantified according to the code for 58 ICPs.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence. **ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present.** A review of all TRUS ICPs with EG found this is the only instance of this occurring. Updating of billable flags is usually done automatically through metering validations but this was adjusted manually causing the error. Additional training has been completed to minimise this but as it was the only instance we believe current controls minimise risk of this occurring.	N/A Ongoing June 2023 May 2023	

Responsibility for metering at GIP	
Non-compliance	**Description**
Audit Ref: 6.2 With: Clause 10.26 (6), (7) and (8) From: 16-Aug-22 To: 07-Apr-23	**MEEN** Ten meter certification expiry dates were updated late. 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 assessed as weak as no updates occurred within the required timeframe. The risk is low because the meters were appropriately certified at all times.

Actions taken to resolve the issue	Completion date	Remedial action status
For each NSP there is only 1 expiry date in the table. We take the earliest expiry date of all applicable certification and inspection across the 3 revenue metering systems on site, one for each generating unit. Typical recertification period for a revenue meter / metering system is 3 years. Typical recertification period for a current or a voltage transformer is 10 years. We perform re-certification on the one due at the earliest and update NSP table with the next earliest expiry date. We usually re-certify a few days/weeks prior to the expiry date, but ATH may only provide us the certificate more than 1 month after the re-certification was performed. That also contributes towards delays in updating the NSP table.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We continue to look for ways that are within our control to reduce the number of late updates to the NSP table.	Ongoing	

Reporting of defective metering installations	
Non-compliance	**Description**
Audit Ref: 6.4 With: Clause 10.43(2) and (3) From: 26-Jun-19 To: 21-Feb-22	**TRUS** MEP not notified in a timely manner for three ICPs where metering installations could be inaccurate, defective, or not fit for purpose. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	TRUS 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 acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	June 2023	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	

Collection of information by certified reconciliation participant	
Non-compliance	**Description**
Audit Ref: 6.5 With: Clause 2 Schedule 15.2 From: 16-Apr-19 To: 02-Sep-22	**MEEN** Four ICPs were not read within the maximum interrogation cycle. Potential impact: Low 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. Four ICPs were not read during the maximum interrogation cycle and remedial actions were started as soon as practicable. The impact is assessed to be low, because only four meters were affected.

Actions taken to resolve the issue	Completion date	Remedial action status
0000033002TC7DD - On 17/01/2023 the meter at this site was replaced with a 4-channel IMP/EXP meter (213316774). The Accucal tech that completed the job confirmed that when the Generator is ON (supplying power to the building) the output from the Generator shows up in the kWh IMP channel, and the kvarhs show up in the kvarh EXP channel. The new meter is reading every day, ie, there is no longer a comms issue at this site. 0033300936PC31C - Resolved 16 June 2022 – Meter Replacement. 0000360675EN65F - Comms Issues resolved 1 August 2022.15.2 0419700048LC0FD - ICP is under RPS profile from 01.05.2019, updated in Registry on 2.09.2022. Actual read received 30.07.2022	May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We will continue with our strong controls in this area.	Ongoing	

Derivation of meter readings	
Non-compliance	**Description**
Audit Ref: 6.6 With: Clause 3(2) Schedule 15.2 From: 01-Jan-22 To: 07-Apr-23	**MEEN** If readings are obtained the meter condition information is not imported and actioned, therefore the following checks are not conducted: • ensure seals are present and intact, • check for phase failure (if supported by the meter), • check for signs of tampering and damage, and • check for electrically unsafe situations. The customer reading for ICP 0000712872HBF96 taken on 8 April 2022 was incorrectly labelled as an actual read. Customer reads are not being validated against another set of validated meter reads before being considered permanent estimates after six months. Potential impact: Medium Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are recorded as moderate because improvements are required to ensure all meter condition examples are reviewed and actioned. Improvement is also required to the process to validate customer reads against other validated reads. The risk is rated as low for the customer read issue, as number of customers reads used is small relative to the total number of reads. The risk rating may be higher for meter condition processing but this will not be known until they start to be reviewed and actioned.

Actions taken to resolve the issue	Completion date	Remedial action status

We asked our meter reading provider, A D Riley to provide us with 12 months worth of condition codes that they have not previously provided. This includes all conditions mentioned in the compliance item. 2 x phase failures, 3 x missing seals and 18 suspected tamperings and a number of suspected faulty meters. We are now investigating all of these. Service requests will be raised where required. Regarding customer reads are not being validated against another set of validated meter reads before being considered permanent estimates after six months: Currently, in SAP a meter read is regarded as actual if one of the following applies: actual in ISU, switch in read, switch out read, followed by an actual read, estimated read billed more than 6 months prior. We will be reviewing our process on permanent estimates and our treatment of customer and estimated reads, however currently improvement process postponed till further integration with TRUS.	May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We have requested A D Riley to continue to supply all condition codes at least in a monthly file until integration with TPW systems occurs.	May 2023	

NHH meter reading application	
Non-compliance	**Description**
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 03-Dec-21 To: 17-Nov-22	**MEEN** Three CS files contained readings which did not reflect an actual or reasonable estimate reading effective from the last day of supply. All of the switches were later withdrawn and there is no impact on reconciliation. **TRUS** All three sampled of a possible 43 MI CS files sent with an actual read from the event date incorrectly labelled as an estimated read. Disconnection reads applied to the day before the disconnection. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as moderate and will mitigate risk most of the time but there is room for improvement. The audit risk rating is low as the number of CS files affected is still relatively low in relation to the volume of switches processed.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN SAP system calculates on the basis of readings available in the system. Hence, they were outside the period of supply. MEEN is accountable to adhere to the code and would ensure it is being dealt with on GTV. **TRUS** **All three sampled of a possible 43 MI CS files sent with an actual read from the event date incorrectly labelled as an estimated read.** Investigation being undertaken to confirm if human error or system error. (sections 4.10, 4.16, 6.7 and 9.1) **Disconnection reads applied to the day before the disconnection.** Will be reviewed as part of general review as per comments for recommendation under section 3.9.	May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS** **All three sampled of a possible 43 MI CS files sent with an actual read from the event date incorrectly labelled as an estimated read.** Confirming the logic to ensure correct read is picked up and used in CS file. **Disconnection reads applied to the day before the disconnection.** As above.	N/A July 2023	

Interrogate meters once	
Non-compliance	**Description**
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Jan-22 To: 31-Dec-22	**MEEN** The best endeavours requirement was not met for 163 ICPs not read during the period of supply. **TRUS** Exceptional circumstances not proven for three of a sample of ten ICPs not read during the period of supply. 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	MEEN The controls are recorded as strong because reasonable steps are in place to obtain meter readings in most cases. The risk is rated as low, as number of customers not read during the period of supply is small relative to the customer base. TRUS The controls are recorded as strong, as Trustpower have robust processes in place including attempting to get reads as customers switch away. The audit risk rating is low as the number of ICPs not read during the period of supply is low.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**

MEEN Our records show that there was only 128 ICP's unread during the period of supply in spite of our best endeavour to read them. These have all since switched out. Access was difficult during pandemic conditions. They are unable to be resolved. **TRUS** We currently have reports in place to help guide our team to gain reads - we continue to gain reads for all sites that are with us during period supply, whether that is by AMI reads, manual readings, or customer read (call, text. Email or letter) our current procedures we have in place are robust.	May 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN We will review the switching process to identify any opportunity to catch switch-out ICPs but this is difficult due to the short period, volume and switching KPIs. Attempts are made to obtain a read but there needs to be a reasonable period of time to establish master data and meter reading protocols. We think this should be 3 months. **TRUS** As above.	September 2023 N/A	

NHH meters interrogated annually	
Non-compliance	**Description**
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Jan-22 To: 31-Dec-22	**MEEN** ICP 0000020823EAE94 not read within 12 months and there was no correspondence with the customer because the ICP was on a smart round. 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 because they mitigate risk to an acceptable level, and ICPs on smart rounds are now changed after one month. 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
This ICP is a smart meter that was moved to a manual meter reading round in July 2022 to ensure actual reads were achieved. The customer refused access to the meter. The communication problem was resolved 5 months later and smart reads have continued to be received since.	January 2023	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Mercury has a process to move non-communicating smart meters to manual meter reading rounds until comms are resolved.	May 2023	

Correction of HHR metering information	
Non-compliance	**Description**
Audit Ref: 8.2 With: Clause 19(2) Schedule 15.2 From: 01-Jan-22 To: 31-Dec-22	**MEEN** Removed meter data not reconciled for the day of the meter change for HHR to HHR AMI meter changes. 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 there is room for improvement for the HHM profiled ICPs. 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
For HHM ICPs currently SAP is working in the way, that can't take into account old meter data and new meter data from a specific timeslice during the day, therefore data from the old meter ends at midnight on the day before the meter change.	May 2023	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Prevention actions and recommended reporting changes will be discussed and analysed once HHM customers migration to TRUS is complete.	Late 2022/ early 2023	

Identification of readings	
Non-compliance	**Description**
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 01-Jan-22 To: 07-Dec-22	**MEEN** Three switch move CS files contained incorrect switch event read types. 13 ICPs which had undergone read renegotiations had incorrect switch event read types recorded in SAP. No visible audit trail present for the change in treatment of estimated and customer reads in the calculation of historic estimate (HE) volumes within SAS or SAP. **TRUS** All three sampled of a possible 43 ICPs sent with the incorrect last read type of "E". Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	For MEEN: • the controls over switch event readings in CS files are strong, most files are produced automatically from SAP with the correct readings applied, • the controls over the manual entry of renegotiated switch event readings are moderate; SAP defaults the read type to actual, and it must be manually changed and checked by the user if it should be estimated, and • the controls over correct classification of estimated and customer readings after six months are weak as the mass treatment of all estimated and customer provided reads as available for use in the calculation of historic estimate volumes once older than six months without an audit trail being present is non-compliant, as users within SAP validating meter reads with periods between reads being greater than six months are not aware of the impact these updates are making to the HE calculations. For TRUS, the controls are recorded as moderate as the controls will mitigate risk to an acceptable level but there is room for improvement. Overall, the controls are assessed to be moderate, and the impact is low. The incorrect read types for switch event readings have no impact on reconciliation as all switch event reads are used to calculate historic estimate regardless of read type. Incorrect CS event read types for transfer switches could have a minor impact on other participants if they wish to renegotiate an event read under Clause 6(2) and (3) Schedule 11.3. The impact of the incorrectly classified customer and estimate readings after six months is rated as low in the absence of any firm data to quantify further.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN **Three switch move CS files contained incorrect switch event read types.** In the light of integration and Mercury moving to GTV system, we recommend not raising a ticket to address the issue. **13 ICPs which had undergone read renegotiations had incorrect switch event read types recorded in SAP.** This was due to human error, Team has been given a refresher. **No visible audit trail present for the change in treatment of estimated and customer reads in the calculation of historic estimate (HE) volumes within SAS or SAP.** We will be reviewing our process on permanent estimates and our treatment of customer and estimated reads and will review what audit trails need to be put in place, however currently improvement process postponed till further integration with TRUS. **TRUS** **All three sampled of a possible 43 ICPs sent with the incorrect last read type of "E".** Investigation being undertaken to confirm if human error or system error. (sections 4.10, 4.16, 6.7 and 9.1)	N/A May 2023 Late 2022/ early 2023 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN As above. **TRUS** **All three sampled of a possible 43 ICPs sent with the incorrect last read type of "E".** Confirming the logic to ensure correct read is picked up and used in CS file.	N/A July 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: 31-Dec-22	**MEEN** Raw meter data is rounded upon receipt and not when volume information is created. **TRUS** Raw meter data is rounded upon receipt and not when volume information is created. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5
Audit risk rating	**Rationale for audit risk rating**
Low	MEEN There are no controls to prevent rounding of raw meter data, the system is designed to round as soon as the data arrives. There is impact to the Switch loss process as rounded reads are being provided to gaining retailers who do not round reads in their system therefore will recognise the switch read as requiring correction via the RR process – the increased RR activity is an impact to both Mercury and other participants. The impact is rated as low because most other retailers have implemented a 1 kWh threshold before an RR is sent. TRUS There are no controls to prevent rounding of NHH raw meter data as it relates to a current system limitation as the system is designed to round as soon as the data arrives. Overall, the controls are rated as moderate. There is little impact because no metered consumption information is "missing". In some cases, the lack of decimals can trigger the switching RR process where the other trader is using decimals, but most of these traders are now filtering out differences less than 1 kWh. The audit risk rating is recorded as low.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN A ticket was raised (#278136) to examine the feasibility and cost of creating a fix for this issue in SAP. However, this was put on hold indefinitely as the amount of resource involved could not be justified in light of the impending Mercury/Trustpower integration and our move to GTV. **TRUS** This is currently on hold until post migration for Mercury.	Late 2022/ early 2023 Late 2022/ early 2023	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
As above.	N/A	

NHH metering information data validation	
Non-compliance	**Description**
Audit Ref: 9.5 With: Clause 16 Schedule 15.2 From: 01-Jan-22 To: 31-Dec-22	**MEEN** Not all inactive consumption is being identified and investigated. **TRUS** Not all identified inactive consumption is being resolved in a timely manner where attempts are made to identify a potential customer. 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 validation controls are generally strong but could be improved for the management of inactive consumption. SAP Inactive consumption report only calculated consumption between two actual reads and where the disconnection read is estimated the report does not identify these ICPs and any read differences between the estimated disconnection read and the next actual read. The impact is assessed as low. The impact on settlement and participants is minor based on the number of exceptions identified, therefore the audit risk rating is low

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN Reminder to staff that corrections should be for the full faulty meter period. **TRUS** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN Have updated training material to clearly outline that correction should applied from the time the meter was faulty. **TRUS** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	May 2023 June 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: 31-Dec-22	**MEEN** Clock synchronisation reports not reviewed for all MEPs. **TRUS** Event information is not analysed and acted upon for all MEPs. Voltage on the load side of the meter should be obtained and evaluated. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	MEEN The controls are recorded as moderate because there is room to improve the monitoring of clock synchronisation reports. The impact on settlement and participants is minor because most issues are identified; therefore, the audit risk rating is low. TRUS The controls are recorded as moderate because they mitigate risk for most scenarios but the process has a reliance on an MEPs assessment of a critical event requiring escalation. There is room for improvement around both monitoring of the MEPs performance in monitoring event logs on Trustpower behalf and also around Trustpower's understanding of the impacts to meter accuracy and integrity of each event type. 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**

MEEN Mercury receives clock synchronisation from Vector Metering, Intellihub and Influx via email, these are reviewed to ensure no job is required and then filed. **TRUS** **Event information is not analysed and acted upon for all MEPs.** **Voltage on the load side of the meter should be obtained and evaluated.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN As above. **TRUS** **Event information is not analysed and acted upon for all MEPs.** **Voltage on the load side of the meter should be obtained and evaluated.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	N/A June 2023	

Calculation of ICP days	
Non-compliance	**Description**
Audit Ref: 11.2 With: Clause 15.6 From: 01-Jan-22 To: 31-Dec-22	**MEEN** Minor ICP days discrepancies identified. **TRUS** ICP days submitted for generation only ICPs. Potential impact: Low Actual impact: Low Audit history: Twice 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
MEEN Human errors and late SAP updates led to minor discrepancies in ICP days, which were corrected later. **TRUS** HHR washup files were prepared by Manawa and submitted under TRUS. R14 submission for September 2021 (last HHR submission) were completed in November 2022 and no further issue to be occurred.	March 2023 November 2022	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
MEEN Our controls and processes in most instances are strong. Process will be reviewed once integration with TRUST will occur **TRUS** As above.	Ongoing N/A	

HHR aggregates information provision to the reconciliation manager	
Non-compliance	**Description**
Audit Ref: 11.4 With: Clause 15.8 From: 01-Sep-21 To: 30-Sep-21	**TRUS** The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh. 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 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
HHR washup files were prepared by Manawa and submitted under TRUS. R14 submission for September 2021 (last HHR submission) were completed in November 2022 and no further issue to be occurred.	November 2022	Cleared
Preventative actions taken to ensure no further issues will occur	**Completion date**	
As above.	N/A	

Creation of submission information	
Non-compliance	**Description**
Audit Ref: 12.2 With: Clause 15.4 From: 01-Jan-21 To: 31-Jan-21	**MEEN** At least eight ICPs have solar generation but submission is not occurring, and notification of gifting has not been provided. **TRUS** The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh. Bridged meter corrections not applied for two of a sample of 13 ICPs. Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted. Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process. Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum. Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission. 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 moderate, as most data is recorded accurately, and validation processes are in place. The impact on settlement is minor, therefore the audit risk rating is low.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN Keep a record of any ICPs that have suspected solar, either due to reverse power being reported from the MEP or the installation type changing to B. Arrange contact with customer to confirm solar and get IMP/EXP meter installed. **TRUS** **The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh.** HHR washup files were prepared by Manawa and submitted under TRUS. R14 submission for September 2021 (last HHR submission) were completed in November 2022 and no further issue to be occurred. **Bridged meter corrections not applied for two of a sample of 13 ICPs.** **Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted.** **Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.** **Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum.** **Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission.** We acknowledge the non-compliances. We are investigating and will take appropriate action to resolve.	May 2023 November 2022 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN Monitor this report more regularly and work with the MEPs and networks to support getting a resolution for some of the older cases I am struggling to get resolved. **TRUS** **The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh.** **Bridged meter corrections not applied for two of a sample of 13 ICPs.** **Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted.** **Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.** **Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum.** **Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	Ongoing June 2023	

Accuracy of submission information	
Non-compliance	**Description**
Audit Ref: 12.7 With: Clause 15.12	**MEEN** Inaccurate submission as follows: • precision of grid generation volumes for Maraetai generation station is insufficient as volumes are reported in increments of 10 kWh, • non-solar distributed generation submitted using PV1 profile code, • ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum), and • seven new connections have incorrect "active" status dates causing a minor impact on the accuracy of volume and ICP days submissions. **TRUS** Bridged meter corrections not applied for two of a sample of 13 ICPs. One of 29 new connections sampled with the incorrect "active" date. ICP 0000574440NRF1C was electrically connected on 15 July 2022 but due to metering issues the first "active" date is recorded as 19 August 2022. The volume for the period from 15 July 2022 to 18 August 2022 has not been reconciled. One of 20 reconnections sampled with the incorrect "active" date ICP 0001853487ALE7F was reconnected on 31 July 2019 but was incorrectly updated to "active" for 2 August 2019. The "active" date was changed to 1 August 2019 on 10 June 2022, but this is still incorrect and is now outside the 14-month revision cycle. ICP 1000599753PCDB2 made "active" on 16 April 2021 was found to have an existing electrically connected meter on site and is likely to have been consuming since mid-2018 resulting in under submission. ICP 0151745161LC3F3 was incorrectly backdated to "inactive" on 15 April 2021 for 25 June 2020 due to human error and reversed to "active" during the audit resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted. Two ICPs not "active" for the correct date as the NT request date was after the reconnection date resulting in consumption being reconciled to the incorrect period. One example of a disconnection read not being entered resulting 10kWh of under submission. Two examples where switch reads were not applied resulting in 237 kWh of over submission for the incorrect period. The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh. Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted. Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.

From: 01-Jan-22 To: 31-Mar-23	Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum. Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission. ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. 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	Controls are rated as moderate because they are effective most of the time. The potential impact is low based on the kWh impact.

Actions taken to resolve the issue	Completion date	Remedial action status

MEEN **Inaccurate submission as follows:**	N/A	Identified
• **precision of grid generation volumes for Maraetai generation station is insufficient as volumes are reported in increments of 10 kWh,** Refer to 2.1.	N/A	
• **non-solar distributed generation submitted using PV1 profile code,** Non-solar distributed generation submitted using PV1 profile code will be reviewed, once integration with TRUST will be completed. ICPs with incorrect average daily kwh recorded were corrected.	Late 2022/ early 2023	
• **ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum), and** Refer 3.7.	N/A	
• **seven new connections have incorrect "active" status dates causing a minor impact on the accuracy of volume and ICP days submissions.** Refer 3.5 and 3.8.	N/A	
TRUS		
Bridged meter corrections not applied for two of a sample of 13 ICPs. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	June 2023	
One of 29 new connections sampled with the incorrect "active" date. ICP 0000574440NRF1C was electrically connected on 15 July 2022 but due to metering issues the first "active" date is recorded as 19 August 2022. The volume for the period from 15 July 2022 to 18 August 2022 has not been reconciled. TRUS has updated the CO status of ICP# 0000574440NRF1C to reflect the IED date and installation of NGCM metering on the 15/07/2022. TRUS continues to work with the livening agent and MEPs to have this metering loaded on the to registry.	Completed/ Ongoing	
One of 20 reconnections sampled with the incorrect "active" date ICP 0001853487ALE7F was reconnected on 31 July 2019 but was incorrectly updated to "active" for 2 August 2019. The "active" date was changed to 1 August 2019 on 10 June 2022, but this is still incorrect and is now outside the 14-month revision cycle. All ICPs with incorrect active status dates identified have been corrected excluding the one ICP identified within the report. This ICP is outside of the submission period so any correction will not impact reconciliation for either retailer.	May 2023	
ICP 1000599753PCDB2 made "active" on 16 April 2021 was found to have an existing electrically connected meter on site and is likely to have been consuming since mid-2018 resulting in under submission.	May 2023	

ICP is outside of 14 month revision window now so any updates made to active date will not impact submission. ICP was connected as of 16/04 as per agreement with Network.		
Two examples where switch reads were not applied resulting in 237 kWh of over submission for the incorrect period. Training was undertaken to prevent agent from making the same error in the future. Documentation was also reviewed to ensure accuracy.	May 2023	
The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh. HHR washup files were prepared by Manawa and submitted under TRUS. R14 submission for September 2021 (last HHR submission) were completed in November 2022 and no further issue to be occurred.	November 2022	
Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted.	June 2023	
Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.		
Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum.		
Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission. We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.		
ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. This has been corrected. ICP had invoices reversed so an install read and install date could be correctly updated. ICP has been correctly rebilled.	May 2023	
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS**	N/A	
Bridged meter corrections not applied for two of a sample of 13 ICPs. Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
One of 29 new connections sampled with the incorrect "active" date. ICP 0000574440NRF1C was electrically connected on 15 July 2022 but due to metering issues the first "active" date is recorded as 19 August 2022. The volume for the period from 15 July 2022 to 18 August 2022 has not been reconciled. TRUS continues to utilise exception reporting to identify and resolve any discrepancies that occur between GTV and the registry. Additional reporting has been implemented between Audits that will further reduce any discrepancies in dates between the registry and GTV.	Completed/ Ongoing	
One of 20 reconnections sampled with the incorrect "active" date ICP 0001853487ALE7F was reconnected on 31 July 2019 but was incorrectly updated to "active" for 2 August 2019. The "active" date was changed to 1 August 2019 on 10 June 2022, but this is still incorrect and is now outside the 14-month revision cycle. Ongoing training is done to ensure all teams responsible for updating statuses to CO including New Connections, Dispatch, and Revenue Assurance are aware of the requirement for statuses to be updated in a timely manner with the correct effective date. TRUS has a number of discrepancy reports around active statuses that support this.	Ongoing	
ICP 1000599753PCDB2 made "active" on 16 April 2021 was found to have an existing electrically connected meter on site and is likely to have been consuming since mid-2018 resulting in under submission. As above: Ongoing training is done to ensure all teams responsible for updating statuses to CO including New Connections, Dispatch, and Revenue Assurance are aware of the requirement for statuses to be updated in a timely manner with the correct effective date. TRUS has a number of discrepancy reports around active statuses that support this.	Ongoing	
Two examples where switch reads were not applied resulting in 237 kWh of over submission for the incorrect period. Full team training session to be held to ensure everyone is processing task correctly.	June 2023	
The September 2021 revision 7 HHR aggregates file did not reflect the submitted HHR volumes for nine NSPs with a difference of 571 kWh. N/A	N/A	

Two ICPs from a sample of 20 with inactive consumption where the actions taken did not ensure all consumption was accounted for resulting in 27 kWh of volume not being submitted. **Seven ICPs with unresolved inactive consumption where attempts to identify a customer are delaying the inclusion of 6,078 kWh of volume in the submission process.** **Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum.** **Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	June 2023	
ICP 0000901755WW6EB had generation kWh apportioned to a period where generation was not present. A review of all TRUS ICPs with EG found this is the only instance of this occurring. Updating of billable flags is usually done automatically through metering validations but this was adjusted manually causing the error. Additional training has been completed to minimise this but as it was the only instance we believe current controls minimise risk of this occurring.	May 2023	

Permanence of meter readings for reconciliation	
Non-compliance	**Description**
Audit Ref: 12.8 With: Clause 4 Schedule 15.2 From: 01-Jan-22 To: 31-Jan-22	**MEEN** All estimated reads treated as permanent estimates after six months, but the Code requires Mercury to use reasonable endeavours to get meter readings for at least 12 months. Some estimates were not replaced by revision 14. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4
Audit risk rating	**Rationale for audit risk rating**
Medium	The controls are recorded as moderate because in trying to the mitigate risk of large amounts of FE still being present in the 14-month revision this process has impacted the prescribed process for calculating historic estimate (HE) volumes. The impact on settlement and other participants is moderate because the treatment of all estimated reads as permanent estimates for historic estimate calculations distorts the NHH submissions between months, impacting the calculation of UFE month to month; therefore, the audit risk rating is medium.

Actions taken to resolve the issue	Completion date	Remedial action status
This will be looked into with the migration to GTV. Some estimates were not replaced by revision 14. Backdated switches paired with Covid-19 lockdowns and restrictions meant we were unable to obtain validated meter readings in all instances before R14 however we believe our controls in this area are strong.	Late 2022/ early 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
We will be raising this with ICT to make the necessary changes to our process around permanent estimates to become compliant.	Late 2022/ early 2023	

Reconciliation participants to prepare information	
Non-compliance	**Description**
Audit Ref: 12.9 With: Clause 2 Schedule 15.3 From: 01-Jan-22 To: 31-Mar-23	**MEEN** ICPs 0000540450TE6E7 and 0007301973NVCDF are believed to have incorrect average daily kWh recorded resulting in a small amount of under submission (0.76 W or 3.2 kWh per annum). **TRUS** Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum. Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as moderate because they are effective most of the time. The impact is assessed to be low as the number of errors is low.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN ICPs with incorrect average daily kwh recorded were corrected. **TRUS** **Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum.** **Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission.** We acknowledge the non-compliance. We are investigating and will take appropriate action to resolve.	May 2023 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN As above. **TRUS** **Three ICPs with unmetered load changes during the audit period where the initial daily kWh value continues to be applied to calculate consumption for submission resulting in 2,095 kWh under submission per annum.** **Two shared UML ICPs did not have unmetered load included in the submission as the UML profile code was not recorded on the registry to trigger the calculation of volume and inclusion in the AV-080 NHHVOLs file. The volume impact was assessed for December 2022 as 16.6 kWh under submission.** Investigating to confirm what the root cause of the non-compliance is, we will review our process with a view to avoiding recurrence.	N/A June 2023	

Historical estimate process	
Non-compliance	**Description**
Audit Ref: 12.11 With: Clauses 4 and 5 Schedule 15.3 From: 01-Jan-22 To: 31-Dec-22	**MEEN** Some HE calculations use estimated readings, which have been made permanent after six months rather than at the 14-month point. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	MEEN The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact is recorded as low overall because there will be a minor impact on the apportionment of volume between months.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**
We will be investigating the ICP in this example to determine what changes are required to fix this issue.	June 2023	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Our controls and processes in most instances are strong. This issue relates to a very specific circumstance and the impact is low. We will liaise with our ICT team to implement any logic changes required to resolve this issue.	Ongoing	

Forward estimate process	
Non-compliance	**Description**
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Jan-22 To: 31-Dec-22	**MEEN** The accuracy threshold was not met for all months and revisions. **TRUS** The accuracy threshold was not met for all months and revisions. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
Low	MEEN and TRUS Controls are rated as strong, as they are sufficient to ensure data is within an acceptable accuracy. The audit risk rating is low as the Initial data is replaced with revised data and washed up.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN We believe that we have strong controls in place as shown by high attainment percentages across the board. Processes remain in place to correct data as actual data is obtained and submissions are corrected via the washup process. Elements of the non-compliance such as irregular balancing area shapes are outside the control of Mercury and as such should not be contributing towards our rating. **TRUS** Impact of COVID-19 restrictions was still present on read attainment and accuracy reduced as a result. This was notable for the sites that were in the inner city commercial premises. Increased AMI rollout and the use of end of month read as well as back into normality will increase read attainment and accuracy.	N/A Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN Mercury uses the industry profile shape as a default however we don't always receive the profile shapes for the new embedded networks. Mercury has recently changed the process where no profile shape is available to use a ratio factoring to ensure data in not over/under reported.	Complete	
TRUS AMI rollout combined with the ongoing use of the EOM read process has resulted in a more robust process should similar events happen in the future. Feasibility of the recommended Permanent Estimate process review is being assessed with the intention of implementation which will improve submission accuracy.	June 2023	

Compulsory meter reading after profile change			
Non-compliance	**Description**		
Audit Ref: 12.13 With: Clause 7 Schedule 15.3 From: 19-Apr-22 To: 19-Apr-22	**MEEN** ICP 1000584371PCEA2 changed profile from RPS to HHR on 19 April 2022 but the reading used was an estimate not an actual. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	**Rationale for audit risk rating**		
Low	MEEN 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 are investigating this issue.		June 2023	Investigating
Preventative actions taken to ensure no further issues will occur		**Completion date**	
Based on the outcome of the investigation, required checks and improvements will be placed.		June 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: 07-Dec-22	**MEEN** Historic estimate thresholds were not met for some revisions. **TRUS** Historic estimate thresholds were not met for some revisions. 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	MEEN The controls are rated as strong as the thresholds were met, and processes are in place to make estimated readings permanent. The audit risk rating is low, because Mercury were reasonably close to the target in all cases. TRUS The controls are rated as moderate because Covid-19 restrictions have had a negative impact on reading attainment and these issues are outside Trustpower's control. The audit risk rating is low as overall the meter reading attainment levels are high.

Actions taken to resolve the issue	Completion date	Remedial action status
MEEN Covid-19 lockdowns and restrictions have had an impact on our read attainment which in turn has affected our revision targets. Our current processes and controls are strong. **TRUS** Overall average HE percentage for R3 is close to 90% and R7 98%, significant increase largely as a result of the AMI rollout. The scenarios that caused the non-compliance (Embedded networks covering inner city commercial, apartments etc.) were impacted by COVID-19 restrictions. Our Billdata team continues to progress on unread /restricted access sites to rectify these scenarios.	Ongoing Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

MEEN Our current processes are strong however we are continuously looking at ways to improve read attainment. **TRUS** Monthly review of ICP level submission accuracy for NSPs with lower read attainment. - ICPs that represent high % in NSP's total volume and the volume is forward estimate will be identified. Then reasonable endeavours threshold will be checked for those ICPs. If criteria met, the read type update to permanent estimate. This process will improve HE submission level.	Ongoing May 2023	