

Compliance plan for Contact Energy Certified Reconciliation Participant – June 2023

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some previous audit corrections not carried out.</p> <p>CTCS and CTCX</p> <p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some previous audit corrections not carried out.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are moderate overall, as there is some room for improvement to validation of inputs into the submission process which will help to improve data accuracy.</p> <p>The impact is high based on the volume differences identified, and that corrected data has not yet been prepared in some instances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p><u>Active date variance with IED and/or meter certification date</u></p> <p>Contact is actively working through the exceptions identified during the audit process.</p> <p>We are continuously working with MEPs, Networks and field service providers to ensure accurate information is returned on the paperwork.</p> <p>We are also reviewing late and inaccurate paperwork issues through our Simplification project to identify ways to further reduce these errors from arising.</p> <p><u>Active ICPs with ANZSIC “T994” or “T994000” don’t know</u></p>	<p><u>CTCT</u></p> <p>Ongoing</p>	<p>Identified</p>

<p>Contact is actively investigating and resolving all 'T9' series ANZSIC code discrepancies identified during the RP Audit.</p>	<p>Ongoing</p>	
<p><u>Active ICP with no MEP and unmetered flag set to 'N'</u></p> <p>Contact has BPEMs within SAP to identify ICPs in this scenario. We find most of these exceptions are where an MEP has auto accepted the nomination and metering details are still required to be uploaded into the Registry.</p>	<p>Ongoing</p>	
<p>Contact is creating additional Registry reporting within Data Bricks to identify active ICPs with no metering event loaded in the Registry and UNM flag is set to 'N'. ICPs that appear on this report will also be investigated to identify if corrections are required to our nomination information loaded in the Registry.</p>		
<p><u>UNM discrepancies</u></p> <p>Contact has been continuously improving this process since the last audit. New reporting has been put in place, with more users have being trained in how to resolve these exceptions as they arise.</p>	<p>Ongoing</p>	
<p>We are working with our SAP technical team to create a new exception in our system to identify where UNM load details are removed within the Registry to ensure the change is replicated in our system in timely manner.</p>		
<p><u>Profile discrepancies</u></p> <p>Contact has strong reporting in place to seize any discrepancies. We are actively working with customers, distributors, and MEPs, to ensure the ICPs identified via our monthly reporting as having incorrect generation related data applied within SAP or the Registry is being investigated/corrected.</p>	<p>Ongoing</p>	
<p><u>Arc cat 2 meters submitted as HHR</u></p> <p>Arc meters are currently being replaced by vector, which is expected to be completed this year. We acknowledge as the program of work nears completion there is the risk of some further data attainment issues. These issues will self-resolve as a result of that work in due course.</p>	<p>Later this year.</p>	
<p><u>Incorrect status recorded on the registry</u></p> <p>Contact is actively investigating all status discrepancies identified via the RP Audit and will be completing corrections</p>	<p>Ongoing</p>	

<p>where feasible. Our teams will also cross check the status discrepancies identified during the RP Audit against our regularly run discrepancy reporting to ensure all discrepancy variances are covered within our data queries.</p> <p><u>CTCS and CTCX</u></p> <p>One ICP with incorrect Active status date corrected during the audit. One new connection and one disconnection had incorrect status dates and were corrected during the audit.</p> <p>Where issues from previous audits had not been corrected this was due to the R14 period having passed which meant any work undertaken to correct would not have improved submission accuracy.</p>	<p><u>CTCS/CTCX</u></p> <p>01/05/2023</p> <p>N/A</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>Contact will continue to review its processes, documentation, and reporting to ensure data discrepancies are identified and resolved at the earliest convenience. As shortfalls are realized, we will further investigate opportunities to reduce issues arising by implementing system, process, and/or report enhancements.</p> <p>We will continue to have regular conversations with internal teams, MEPs, Networks, and third-party service providers to ensure the importance of, and continued improvement to, timeframes and data completeness is recognized.</p> <p><u>CTCS and CTCX</u></p> <p>Simply Energy have raised the issue of being able to import partial HHR datafiles from MEPs with their system provider again and are hopeful of being able to progress a solution given other recent system changes may have facilitated a solution for this.</p> <p>Simply Energy have created a process where the Data Management analyst works with the Billing team to identify zero usage sites every three months, investigate these to find those that are reading 0, and then raise requests for the customer to be contacted to verify that 0 usage is correct. Where the customer believes this usage to be incorrect the business will raise service orders for the MEP to investigate.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS/CTCX</u></p> <p>Ongoing</p> <p>23/06/2023</p>	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11 With: Clause 10.33A</p> <p>From: 01-Jun-22 To: 31-May-23</p>	<p>CTCT</p> <p>104 new ICPs did not have their meters certified within five business days of initial electrical connection.</p> <p>244 reconnection ICPs did not have their meters certified within five business days of reconnection.</p> <p>Metering for three ICPs was not recertified on un-bridging.</p> <p>CTCS</p> <p>One new ICP did not have its meter certified within five business days of initial electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong. Uncertified meters are monitored.</p> <p>The audit risk rating is low as a small proportion of ICPs were affected. Uncertified meters may have unidentified accuracy issues, but other validation processes will help to identify these.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p><u>Late certification</u></p> <p>Unfortunately, Contact is unable to resolve this non-compliance as this has already occurred, however, we have started investigating and implementing preventative actions to increase our controls and further reduce the likelihood of this non-compliance arising in the future. - Please refer to the preventative actions section.</p> <p><u>Not recertified on un-bridging</u></p> <p>We are in the process of organising certification for the ICPs identified during the RP Audit as not being recertified on un-bridging.</p> <p>CTCS</p>	<p>CTCS</p> <p>NA</p>	Identified

Simply Energy cannot correct historic timeliness of these updates.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact will continue to communicate & work with MEPs and field service providers to determine how we can further decrease the opportunity of non-certified metering and late meter certifications from arising.</p> <p>We have identified a gap where replication of our recertification monitoring report had not been successfully replicated from SAS to Data Bricks. We are in the process of replicating this report into Data Bricks, and plan on using this as an opportunity to implement improvements to the reporting, as well as discuss ownership, responsibilities, and training with the respective teams involved.</p>	<p><u>CTCT</u></p> <p>30/09/2023</p>	
<p><u>CTCS</u></p> <p>Simply Energy have identified more resource is needed in this space and as a result, are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p> <p>Simply Energy is also working with their internal system administrator to improve current process in Salesforce to assist with timing and actions and to provide the Operations Team Leader visibility to assist and/or add resource where required.</p>	<p><u>CTCS</u></p> <p>01/09/2023</p> <p>01/12/2023</p>	

Arrangements for line function services	
Non-compliance	Description
<p>Audit Ref: 2.12</p> <p>With: Clause 11.16</p> <p>From: 01-Sep-22</p> <p>To: 31-May-23</p>	<p>CTCS</p> <p>CTCS traded on ICPs connected to the CIAL, SMAL and TIKL networks where there was no arrangement or agreement in place.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating			
<p>Low</p>	<p>The controls are rated as moderate. CTCS had assumed that Contact had arrangements in place for these existing embedded networks and is working to put arrangements in place.</p> <p>The impact is low because 12 active ICPs were supplied across the affected networks during the audit period, and seven active ICPs are currently supplied. No issues arose during the audit period which could not be resolved because there was no arrangement in place. Contact and Simply Energy have existing arrangements in place with other networks managed by Tenco.</p>			
Actions taken to resolve the issue		Completion date	Remedial action status	
<p><u>CTCS</u></p> <p>Simply Energy is in the process of agreeing terms with SMAL, CIAL has ceased effective 30 April 2023, and TIKL do not have an agreement with any Traders.</p>	<p><u>CTCS</u></p> <p>31/08/2023</p>	<p>Identified</p>		
Preventative actions taken to ensure no further issues will occur				Completion date
<p><u>CTCS</u></p> <p>Most networks will insist on a trader entering into a DDA before trading so in the unlikely case that this has not happened, a monthly check will be incorporated into the business day schedule to check for this and ensure we progress these to completion.</p>	<p><u>CTCS</u></p> <p>20/06/2023</p>			

Arrangements for metering equipment provision	
Non-compliance	Description
<p>Audit Ref: 2.13</p> <p>With: Clause 10.36</p> <p>From: 01-Dec-21</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>No arrangement in place for the maintenance of BOPE metering.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are rated as strong overall. BOPE meters are displaced as soon as possible.</p> <p>The audit risk rating is low as a small proportion of ICPs were affected.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>Contact was originally in the process of establishing an agreement with BOPE/Nova, however, this ceased when BOPE meters were acquired by IHub.</p> <p>Our arrangements in relation to BOPE meters will be resolved either through the transfer of the BOPE MEP ownership within the registry to IHub or our next metering service arrangement iteration with IHub (due Feb 2024).</p>	<p>CTCT</p> <p>28/02/2024</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

Meter bridging		
Non-compliance	Description	
<p>Audit Ref: 2.17</p> <p>With: Clause 10.33C and 2A of Schedule 15.2</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>Two ICPs from a sample of 21 where the MEP was notified of a bridged meter later than one business day from when Contact was notified.</p> <p>Volume corrections not applied for 48 bridged ICPs that have subsequently switched away.</p> <p>Volume corrections not applied or applied incorrectly for five bridged ICPs from a sample of nine ICPs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Medium</p>	<p>The controls are rated as weak. While the reporting and identification of bridged meters has improved the controls around processing corrections are not sufficient to ensure that these are consistently processed.</p> <p>The audit risk rating is medium based on the number of ICPs with bridged meters identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p><u>Late notification to MEP of a bridged meter</u></p>		<p>Identified</p>

<p>Unfortunately, we are unable to resolve this non-compliance as this has already occurred, however, we have started investigating and implementing preventative actions to increase our controls and further reduce the likelihood of this non-compliance arising in the future. - Please refer to the preventative actions section.</p> <p><u>Volume Corrections</u></p> <p>Energy Rec team to complete reconciliation of existing corrections for accuracy, including apply consumption corrections for Bridged ICPs not yet corrected and ensure that the volumes are correctly applied for submission based on the submission type for the affected ICP.</p>	<p>N/A</p> <p>30/09/2023</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p><u>Late notification to MEP of a Bridged meter</u></p> <p>With the implementation of Project Edna, we have been successful in advocating for data previously only accessible via Orb, to be available within our new data platform.</p> <p>This newly accessible data will open further opportunities to automate the monitoring and notifying of bridged meters to MEPs.</p> <p>We are working with our Business Simplification Team to identify how we can utilise this newly accessible data to improve our processes and reporting of bridged meters, to further decrease the likelihood of this non-compliance arising in the future.</p> <p>While our Business Simplification Team investigate these opportunities, we will continue to identify bridged metering daily via our FWR (further work required) flags within our service order dockets and will notify MEPs the same day these are identified.</p> <p><u>Volume Corrections</u></p> <p>Contact will investigate the current process to investigate room for further improvements.</p>	<p>Working progress</p>	

<p>Changes to registry information</p>	
<p>Non-compliance</p>	<p>Description</p>
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p>	<p>CTCT</p> <p>1,718 late updates to “active” status.</p> <p>721 late updates to “inactive” status.</p> <p>2,544 late trader updates.</p>

<p>From: 01-Jun-22 To: 20-Feb-23</p>	<p>186 ANZSIC code updates were made more than 20 business days after CTCT began trading at the ICP.</p> <p>CTCS</p> <p>Eight late updates to “active” status.</p> <p>20 late updates to “inactive” status.</p> <p>127 late trader updates.</p> <p>One ANZSIC code update was made more than 20 business days after CTCS began trading at the ICP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are rated as moderate overall, as there is room for improvement.</p> <p>Overall, the level of compliance is high with the majority of updates being completed within five business days of the event. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p><u>Status & Trader updates</u></p> <p>Contact acknowledges the non-compliances identified and the underlying factors that lead to incorrect or late notifications in the Registry.</p> <p>Where errors or delays are a result of the paperwork returned from the field, we will continue to utilise the contractor performance provisions within our respective agreements to address any concerns and improve the process moving forward.</p> <p>Where trending errors or delays are found to be a result of data entry issues, processes, or system related errors, we will continue to review the respective areas to identify opportunities for improvement. These improvements will be by way of improving process documentation, providing additional training where required, and/or completing system enhancements.</p> <p><u>ANZISC Codes</u></p> <p>Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	<p>Identified</p>

<p>they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise.</p> <p>The late updates identified by the Auditors were predominately a result of correcting data inaccuracies identified via the above-mentioned reporting, or a result of the delays in paperwork affecting new connections and meter changes.</p> <p>As the root cause of the data inaccuracies are identified, we are actively working to implement further training and or process changes to assist with decreasing the opportunity for the loading of incorrect late ANZSIC codes updates to the Registry from arising.</p> <p><u>CTCS</u></p> <p>The 127 late trader updates were caused by an MEP providing consistent unvalidated HHR AMI data. Simply Energy performed a review of estimated HHR data and therefore backdated any changes to when the last time was that Actual data was received. A backdated date therefore was unavoidable.</p> <p>Late updates cannot be corrected. NB Meetings were held immediately after the Audit to ensure that Data Quality and timeliness was a daily priority. Process refreshers were also provided to all team members.</p>	<p>Ongoing</p> <p><u>CTCS</u></p> <p>N/A</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>We will continue to assess and enhance our processes, discrepancy reports, documentation, etc on a regular basis to ensure they are fit for purpose.</p> <p><u>CTCS</u></p> <p>Trader updates for Profiles HHR to RPS will more than likely always be a non-compliance as MEP's only update the Advanced Meter Flag when there's been 10 days of no reads received. As soon as the flag is updated, Simply Energy updates the Profile.</p> <p>Simply Energy have identified more resources are needed in this space and as a result, are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>01/09/2023</p>	

Simply Energy is also working with their internal system administrator to improve current process in Salesforce to assist with timing and actions and to provide the Operations Team Leader visibility to assist and/or add resource where required.	01/12/2023	
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Trader responsibility for an ICP		
Non-compliance	Description	
Audit Ref: 3.4 With: Clause 11.18 From: 18-Nov-22 To: 23-Feb-23	CTCT ICP 0000514338CE7AF did not have an accepted MEP nomination within 14 business days of initial electrical connection. 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, because the late nomination was caused by a rare event where two service orders were raised for one new connection and needed subsequent investigation to confirm the correct MEP. The impact is low, because the MEP had accepted responsibility and certified the meter on the initial electrical connection date.	
Actions taken to resolve the issue	Completion date	Remedial action status
CTCT An MEP event is now present within the Registry. The missing data was a result of two new connection jobs being raised for the same ICP, which entail required investigation to confirm if the metering information returned on the completed service order was correct or not.	CTCT 26/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT We are looking into what opportunities we have to improve existing reporting to identify ICPs that did not have an accepted MEP nomination within 14 business days of initial electrical connection as a result of paperwork related issues.		

Provision of information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 29-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>503 late updates to active status and MEP nominations for new connections.</p> <p>ICP 0000062294NT59C was connected on 13 February 2023 and the meter has recorded consumption since 14 February 2023. The ICP has not been claimed and moved to active status by CTCT because it is a TOU meter and expected to be supplied under CTCS.</p> <p>13 of a sample of 49 ICPs checked had incorrect active status dates, and one was corrected during the audit.</p> <p>186 ANZSIC code updates were made more than 20 business days after CTCT began trading at the ICP.</p> <p>CTCS</p> <p>18 late updates to active status for new connections.</p> <p>One ICP had an incorrect active status date recorded and was corrected during the audit.</p> <p>One ANZSIC code update was made more than 20 business days after CTCS began trading at the ICP.</p> <p>Four late MEP nominations for new connections.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate for both codes, as there is room for improvement.</p> <p>The audit risk rating is low because the number of ICPs affected overall is small. Late or inaccurate changes to “active” can result in delays in providing submission information and billing the customer, and incorrect active dates can have an impact on submission data.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT</p> <p><u>New Connection</u></p> <p>Correction process is underway for the ICPs identified during the audit process.</p> <p>New connections are monitored through automated daily reports. Late updates are often related to delayed paperwork returned from the field by the contractors. We are reviewing</p>		<p>CTCT</p> <p>Ongoing</p>	Identified

<p>this process under our business simplification project to work more collaboratively with our field service providers to ensure field paperwork is returned accurately and in timely manner.</p> <p>ICP 0000062294NT59C is now claimed by CTCS with an active date of 13/02/2023.</p> <p>We are regularly providing training to our operators to ensure new connections for ToU meters are passed over to CTCS at the earliest convenience, and we are exploring further changes to our system that would ensure more robust controls to monitor these are in place.</p> <p><u>ANSIC codes</u></p> <p>Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise.</p> <p>The late updates identified by the Auditors were predominately a result of correcting data inaccuracies identified via the above-mentioned reporting, or a result of the delays in paperwork affecting new connections and meter changes.</p> <p>As the root cause of the data inaccuracies are identified, we are actively working to implement further training and or process changes to assist with decreasing the opportunity for the loading of incorrect late ANZSIC codes updates to the Registry from arising.</p> <p><u>CTCS</u></p> <p>Late updates cannot be corrected. Simply Energy continues to review the ANZSIC codes of ICPs that switch in from other traders to get them as accurate as possible, which includes periodic reviews of all ICPs. Sometimes this will mean an ANZSIC code is updated weeks after switching an ICP where the business believes the coding can be improved - as discussed with the auditor, Simply Energy are prioritizing accuracy over timeliness.</p>	<p><u>CTCS</u></p> <p>N/A</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>We continue to work with our field service providers to ensure complete and accurate paperwork is returned in a timely</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	

<p>manner. Regular training is provided to the agents, and we are exploring potential changes within the system to ensure more robust controls are in place to restrict ToU meter new connections being accepted or raised by under CTCT.</p> <p>We will continue to assess an enhance our processes, discrepancy reports, documentation, etc on a regular basis to ensure they are fit for purpose.</p> <p><u>CTCS</u></p> <p>Simply Energy have identified more resource is needed in this space and as a result, are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control</p> <p>Monthly reports are sent to Operations where the ANZSIC code requires further investigation for existing ICP's - the Operations Team works closely with the Customer Care Team to provide the correct codes and the Registry is updated as soon as an improved code is confirmed.</p>	<p><u>CTCS</u></p> <p>01/09/2023</p> <p>Ongoing</p>	
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ANZSIC Codes	
Non-compliance	Description
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 02-May-23</p>	<p>CTCT</p> <p>Six (6%) of the 100 ICPs sampled had an incorrect ANZSIC code applied and were corrected during the audit.</p> <p>CTCS</p> <p>Three (10%) of the 30 ICPs sampled had an incorrect ANZSIC code applied and were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are rated as moderate overall but there is room for improvement.</p> <p>The audit risk rating is low because there is no impact on settlement outcomes and a low impact on the Electricity Authority's reporting accuracy.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise.</p> <p>As the root cause of the data inaccuracies are identified, we are actively working to implement further training and or process changes to assist with decreasing the opportunity for the loading of incorrect or late ANZSIC code updates to the Registry from arising.</p> <p><u>CTCS</u></p> <p>30 ICPs sampled had an incorrect ANZSIC code applied and were corrected during the audit.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>26/05/2023</p>	<p>Cleared</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCS</u></p> <p>Simply Energy's project to improve the accuracy of ANZSIC codes is ongoing. There are regular monthly checks of any new ICP on the "Residential" or "Unknown" ANZSIC codes and in addition, the team are going through all ICPs in order of ANZSIC codes, to assess if the code seems appropriate based on the business name and contacting the customer to confirm if not. This process is currently up to ANZSIC C130 so it will take time to check every ICP Simply Energy are the responsible Trader for and the business accepts that there may be some inaccuracies in the meanwhile as they work towards completion of this review.</p>	<p><u>CTCS</u></p> <p>Ongoing</p>	

Changes to unmetered load	
Non-compliance	Description
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p>	<p><u>CTCT</u></p> <p>000040854NT2F4 had incorrect daily unmetered kWh recorded and was updated on the registry and in SAP during the audit. Due to a calculation error the load was recorded as 0.62 kWh per day instead of 6.187 kWh per day.</p> <p>0000254425HB5DE had incorrect daily kWh recorded and has been corrected in SAP but not on the registry. Ballast was not included in the original calculation of 1.32 kWh per day which has now been corrected to 1.51 kWh per day.</p>

<p>From: 05-Mar-18 To: 31-May-23</p>	<p>0000018605WECOF had incorrect daily kWh recorded and is to be corrected in SAP and on the registry. The original calculation of 0.302 did not include the full wattage that CTCT and the distributor believe is connected to the ICP (0.529 kWh per day for 184W connected 11.5 hours per day across four ICPs).</p> <p>0000553257NR3D0 is recorded with 1.2 kWh daily unmetered kWh and 0.00;0.00;SecurityGate. It is expected to be recorded with 0.02 kWh per day and 0.2kW;0.10;SecurityGate.</p> <p>0007680774HB8DE's trader update for 1 November 2014 on 14 September 2022 contained an incorrect daily unmetered kWh. Daily unmetered kWh should be 2.989 but was updated to 3.000 in error.</p> <p>ICP 0000513944CEF86 is an unmetered weather station which switched in on 1 January 2023. CTCT has investigated the load with the network and customer who have confirmed that the ICP was livened with 480W connected 24 hours, equivalent to 11.52 kWh per day or 4,205 kWh per annum. The network has updated their unmetered load details on the registry, and CTCT intends to update their trader unmetered load details in SAP and the registry and provide revised submission data.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are currently rated as moderate, as there are good validation processes in place to detect and resolve unmetered load errors. A small number of errors were identified during the audit analysis of all ICPs with unmetered load.</p> <p>The audit risk rating is low because the impact on settlement is minor based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Corrections have been made to all the ICPs identified during the audit process.</p> <p>Contact has been continuously improving this process since the last audit and will be reviewing the manual calculation process to reduce agent errors.</p> <p>We are working with our SAP technical team to create a new exception in the system to identify where UNM load details are removed in registry to resolve them in timely manner.</p> <p>New reporting has also been put in place and more users have been trained to resolve UNM exceptions.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCT</p> <p>We are reviewing the calculation process to further reduce operator errors. Our SAP team is investigating opportunities to trigger a notification within SAP when UNM is removed in the Registry.</p>	<p>CTCT</p> <p>Ongoing</p>	

Management of "active" status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 24-Dec-21</p> <p>To: 13-Dec-22</p>	<p>CTCT</p> <p>ICP 0395721083LCCAF was reconnected during the previous trader's period of supply because the correct reconnection date was not provided to the MEP when requesting the reconnection.</p> <p>Three reconnections had incorrect status event dates which were corrected during the audit.</p> <p>One reconnection was processed for the wrong ICP and was corrected during the audit.</p> <p>13 of a sample of 49 new ICPs checked had incorrect active status dates, and one was corrected during the audit.</p> <p>CTCS</p> <p>One new ICP had an incorrect active status date recorded and was corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are rated as moderate, because most information is accurate but there is some room for improvement.</p> <p>The audit risk rating is low because the number of ICPs affected overall is small. Late or inaccurate changes to "active" can result in delays in providing submission information and billing the customer, and incorrect "active" dates can have an impact on submission data.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>Contact is working through to resolve the data inaccuracies identified during the audit.</p>	<p>CTCT</p> <p>Ongoing</p>	<p>Identified</p>

<p>ICP 0395721083LCCAF was reconnected earlier than Contact's switch date due to a human error. We are in the process of providing refresher training to our operators to ensure correct dates are applied on the reconnection jobs.</p> <p>We will continue to work with our field service providers to ensure accurate paperwork is returned in a timely manner to further reduce the opportunity for this non-compliance to arise in the future.</p> <p><u>CTCS</u></p> <p>The issue has been cleared.</p>	<p><u>CTCS</u></p> <p>26/05/2023</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>Contact is regularly providing training to the users and working with field service providers to further reduce these errors arising.</p> <p><u>CTCS</u></p> <p>Simply Energy have identified more resources is needed in this space and as a result, are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>01/09/2023</p>	

Management of "inactive" status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p>	<p>CTCT</p> <p>ICP 0007118113RN739 inactive consumption was confirmed as being genuine however this has not been resolved so this volume (5,082 kWh) is missing from the submission process.</p> <p>66 ICPs the inactive consumption was confirmed as being genuine however corrupt settlement unit assignments are preventing these ICPs from being included in submission totalling 29,112 kWh.</p> <p>CTCS</p> <p>One inactive status update had an incorrect status reason applied and was corrected prior to the audit.</p> <p>One inactive status update had an incorrect event date applied and was corrected during the audit.</p> <p>Potential impact: Medium</p>

From: 25-Jul-22 To: 11-Feb-23	Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as moderate overall. Most disconnection information checked was processed accurately, but there is room for improvement around the monitoring and management of settlement unit assignments. The number of ICPs affected and inactive consumption volume is medium, therefore the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p><u>0007118113RN739</u></p> <p>Contact is in the process of making the required corrections within SAP so genuine volume is correctly submitted.</p> <p><u>Incorrect Settlement Unit Assignments</u></p> <p>We are raising a system defect to identify why SAP system auto-triggers do not successfully update the Settlement Unit from E_DISC_INA to E_NH or E_HHE when reconnections are completed in SAP/Registry. This will identify whether a system or BAU processing issue is the root cause.</p> <p>We are looking at opportunities to establish monthly reporting to identify discrepancies between SAP Settlement Unit and Registry Active/Inactive statuses.</p> <p>This includes completing a one-off reconciliation of existing exceptions, ensuring all are resolved and consumption successfully submitted going forward.</p> <p><u>CTCS</u></p> <p>Issue has been cleared.</p>	<p><u>CTCT</u></p> <p>30/11/2023</p> <p>30/09/2023</p> <p>30/09/2023</p> <p><u>CTCS</u></p> <p>26/05/2023</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u>	<u>CTCT</u>	

<p>A will provide a refresher of the process with respective teams to ensure all areas understand the correct actions and flow on effects going forward.</p> <p><u>Inactive Consumption Report</u></p> <p>Contact will review where the responsibility to manage ICP exceptions via SAP Report ZIN_EXT_SETTL_OPERAT best sits to ensure that in conjunction with the SAP BPEMS being monitored and worked, that all exceptions are identified and resolved by the appropriate teams in a timely manner.</p> <p><u>CTCS</u></p> <p>Simply Energy have identified more resource is needed in this space and as a result, are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control.</p> <p>A task has been added to the regular monthly compliance schedule to ensure all inactive ICPs are reviewed to ensure there is no consumption. ICPs inactive will still remain on Meter Reader Schedules.</p>	<p>22/06/2023</p> <p><u>CTCS</u></p> <p>01/09/2023</p> <p>Ongoing</p>	
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Losing trader must provide final information - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 03-Jun-22</p> <p>To: 15-Nov-22</p>	<p>CTCT</p> <p>Three CS breaches.</p> <p>Three E2 breaches.</p> <p>Four CS files had an average daily kWh of zero incorrectly recorded which was created prior to a system fix to ensure average daily kWh was correctly calculated.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are strong. The accuracy of CS content has improved, and a small number of late files were issued. No errors or late files were identified after November 2022.</p> <p>The impact is low. The average daily consumption value only has an impact if the gaining retailer uses it to create forward estimate where actual readings are not available, and there were a small number of late files.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u> <u>CS & E2 breaches.</u></p> <p>Contact has implemented a process change last year and since then no related non-compliances are noted. We are regularly providing refresher training to the agents to ensure adherence to the new process.</p> <p>Four CS files had an average daily kWh of zero incorrectly recorded which was created prior to a system fix to ensure average daily kWh was correctly calculated.</p> <p>The system change was deployed in March 2023 and has been validated to ensure working correctly, no further instance of this non-compliance has been noted after the system fix.</p>	March 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact has implemented a process change and deployed system fix, no further occurrence of these issues is noted since then.</p>	March 2023	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 08-Dec-22 To: 25-Jan-23</p>	<p><u>CTCT</u></p> <p>Four RR breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong and will mitigate risk to an acceptable level.</p> <p>The impact assessed to be low because the RRs were completed with sufficient time for revised submission information to be provided.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has robust process in place for RRs.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	Identified

<p>Contact was attempting to acquire two validated reads to start the RR process, but it was delayed due to access issues to the meters. RRs were sent as soon as practicable once two validated reads were obtained.</p> <p>We believe our current processes are effective to reduce the number of late RR's but access issues at times can impact it overall.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> Please refer to actions taken to resolve field.	<u>CTCT</u> Ongoing	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.7</p> <p>With: Clause 9 of Schedule 11.3</p> <p>From: 10-Oct-22</p> <p>To: 17-Jan-23</p>	<p>CTCT</p> <p>Three of a sample of 15 switch move ICPs should technically have been requested as transfer switches. Switch move was applied to ensure the correct event date was used.</p> <p>CTCS</p> <p>Two of the sample of ten switch move ICPs should technically have been requested as transfer switches. Switch move was applied to ensure the correct event date was used.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong and mitigate risk to an acceptable level.</p> <p>The impact is assessed to be low as this would have a greater customer and reconciliation impact if a switch move was not issued in these situations.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has strong controls and robust processes in place to assign the correct switch types. MI switch was assigned to align the switch date with contract end date (with alternate retailer) or to correct the switch event date (after withdrawal process). These changes to switch event dates are not possible to achieve</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	<p>Identified</p>

<p>with current settings of TR switch. This limitation with the Transfer switch has been raised with Electricity Authority through the Switch process review via Switching Technical Group.</p> <p><u>CTCS</u></p> <p>These historic issues cannot be corrected.</p>	<p><u>CTCS</u></p> <p>N/A</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>This limitation with the Transfer switch has been raised with Electricity Authority through the Switch process review via Switching Technical Group.</p> <p><u>CTCS</u></p> <p>Simply Energy have immediately implemented a QA process on 26/05/2023, where the Operations Team lead acts as a backup to ensure that the use of Switch types is correct then a final approval is given.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>26/05/2023</p>	

Losing trader provides information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 15-Jul-22</p> <p>To: 15-Jul-22</p>	<p>CTCT</p> <p>Two ET breaches. The switches were later withdrawn so the incorrect dates had no impact.</p> <p>CTCS</p> <p>One AN contained an incorrect proposed event date. The switch was later withdrawn so the incorrect date had no impact.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are recorded as strong as they will mitigate risk to an acceptable level. The issue relating to application of incorrect event dates under certain</p>

	<p>circumstances which is causing ET breaches is currently with the ICT team for resolution.</p> <p>The audit risk rating is low because the impact on settlement and participants is minor. The affected switches were withdrawn.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We are working with our ICT team to improve our system logic. This issue only happens in certain circumstances and a system change will resolve it.</p>	<p><u>CTCT</u></p> <p>Nov 2023</p>	Investigating
<p><u>CTCS</u></p> <p>These historic issues cannot be corrected.</p>	<p><u>CTCS</u></p> <p>NA</p>	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact's SAP technical team are working to identify/develop a solution.</p>	<p><u>CTCT</u></p> <p>Nov 2023</p>	
<p><u>CTCS</u></p> <p>Since the Automation of the AN's, there have been no further issues.</p>	<p><u>CTCS</u></p> <p>31/07/2022</p>	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p>	<p>CTCT</p> <p>One CS had an average daily kWh of zero incorrectly recorded in a CS file which was created prior to a system fix to ensure average daily kWh was correctly calculated.</p> <p>Two switch move CS files had an incorrect last actual read date.</p> <p>CTCX</p> <p>One switch move CS file had an incorrect last actual read date.</p> <p>Two switch move CS files had incorrect average daily kWh.</p> <p>CTCS</p> <p>Three switch move CS files had incorrect last actual read dates.</p> <p>Three switch move CS files had their switch event read type recorded as estimated, but should have been actual.</p> <p>One switch move CS file had incorrect average daily kWh.</p> <p>Potential impact: Medium</p>

From: 11-Jul-22 To: 09-Feb-23	Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong. The accuracy of CS content has improved, and a small number of late files were issued.</p> <p>For CTCS and CTCX no errors were identified after December 2022 and for CTCT no errors were identified after February 2023. The inaccurate file content has little to no impact on other participants and settlement:</p> <ul style="list-style-type: none"> the last actual read date does not directly impact on settlement or other participants, the average daily consumption value only has an impact if the gaining retailer uses it to create forward estimate where actual readings are not available, and the incorrect switch event read type does not impact on RRs for switch moves and does not impact on reconciliation as all switch event reads are treated as permanent by the reconciliation process. 	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>One CS had an average daily kWh of zero incorrectly recorded in a CS file which was created prior to a system fix to ensure average daily kWh was correctly calculated.</p> <p>A system change was deployed in March 2023 and has been validated to ensure it is working correctly; no further instance of this non-compliance has been noted since the system fix was implemented.</p> <p>Two switch move CS files had an incorrect last actual read date.</p> <p>Our ICT team is investigating this issue to identify a solution. We are expecting this to be resolved by September 2023.</p> <p><u>CTCS & CTCX</u></p> <p>These historic issues cannot be corrected.</p>	<p><u>CTCT</u></p> <p>September 2023</p> <p><u>CTCS & CTCX</u></p> <p>N/A</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Please refer to the actions taken to resolve this field.</p>	<p><u>CTCT</u></p> <p>September 2023</p>	

<p><u>CTCS & CTCX</u></p> <p>Simply Energy immediately implemented a QA process on 01/11/2022, where a backup team member checks that the data is correct then gives the final approval. This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023.</p>	<p><u>CTCS & CTCX</u></p> <p>31/12/2023</p>	
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Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12 of Schedule 11.3</p> <p>From: 01-Dec-21</p> <p>To: 22-May-22</p>	<p><u>CTCT</u></p> <p>24 late RR breaches for switch moves.</p> <p><u>CTCS</u></p> <p>Two RR breaches for switch moves.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are rated as strong and will mitigate risk to an acceptable level.</p> <p>The impact assessed to be low because the RRs were completed with sufficient time for revised submission information to be provided.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has robust process in place for RRs. Contact was attempting to acquire two validated reads to start the RR process, but it was delayed due to access issues to the meters. RRs were sent as soon as practicable once two validated reads were obtained. We believe our current processes are effective to reduce the number of late RR's but access issues at times can impact it overall.</p> <p><u>CTCS</u></p> <p>These historic issues cannot be corrected.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>NA</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p>	<p><u>CTCT</u></p>	

<p>Please refer to the actions taken to resolve field.</p> <p><u>CTCS</u></p> <p>As recently as 24/02/2023, Simply Energy had implemented a change in Salesforce where users can request special reads from Wells for this purpose. Where there is only one actual read, Simply Energy now requests a special read to ensure there are at least two actual reads before requesting a read amendment. Typically, Simply Energy would request the read history from the alternative retailer if there was only one read in place, however, the business now has the convenience of requesting special reads where applicable.</p>	<p>Ongoing</p> <p><u>CTCS</u></p> <p>24/02/2023</p>	
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Withdrawal of switch requests	
Non-compliance	Description
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 08-Nov-22</p> <p>To: 19-Jan-23</p>	<p>CTCT</p> <p>34 SR breaches.</p> <p>133 NA breaches.</p> <p>Six AW breaches.</p> <p>Seven of a sample of 21 NWs did not have the code with the best fit applied.</p> <p>NW-1097618 for ICP 0007707965TUFF0 was sent in error due to a misunderstanding, the staff member should have issued an RR instead.</p> <p>One incoming NW was rejected in error and was accepted on reissue.</p> <p>CTCS</p> <p>One NW was issued in error and rejected by the other trader because the wrong ICP was selected.</p> <p>Three NA breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are moderate overall.</p> <ul style="list-style-type: none"> • The sample of NWs assessed for accuracy focussed on rejected NWs, which were more likely to be incorrect, but there is room for improvement. • The AW breaches were caused by an isolated system communications issue and were not caused by any issues with the switching process itself. • The NW breaches were caused by delays in receiving information to confirm that the withdrawal was required.

	The audit risk rating is low because impact on settlement and participants is minor. Revised reconciliation data will be provided through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u> <u>SR & NA breaches.</u> Late withdrawals often involve complex investigations for meter mix-ups, back dated switches, and can require site visits to confirm correct ICPs which delays the overall NW process. Contact is regularly reviewing this process to make improvements.</p> <p><u>NW Code breaches</u> NW-1097618 for ICP 0007707965TUFF0 was sent in error due to a misunderstanding, the staff member should have issued an RR instead.</p> <p><u>NW sent in error</u> Contact is regularly providing refresher training to the operators to ensure accurate NW code is applied in all instances and correct switching process is used to resolve the issues. We have provided more clarity on DF code to the agents which will reduce the re-occurrence of these non-compliances.</p> <p><u>AW breaches.</u> All the late AW files were for one day from last year, and they were impacted due to system communication issue. Files were cleared the next day, and more controls have been put in place to stop the re-occurrence.</p> <p><u>CTCS</u> These historic issues cannot be corrected.</p>	<p><u>CTCT</u> Ongoing</p> <p><u>CTCS</u> NA</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u> The controls have been made more stringent to avoid the late AWs and further training has been provided to the operators to apply the correct NW code.</p> <p><u>CTCS</u></p>	<p><u>CTCT</u> Ongoing</p> <p><u>CTCS</u></p>	

A QA process was implemented immediately on 26/05/2023, where a backup staff member checks that the data is correct then gives the final approval.	26/05/2023	
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Maintaining shared unmetered load		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 11.4 From: 01-Dec-22 To: 31-May-23	CTCT 0000018605WECOF had incorrect daily kWh recorded and is to be corrected in SAP and on the registry. The original calculation of 0.302 did not include the full wattage that CTCT and the distributor believe is connected to the ICP (0.529 kWh per day for 184W connected 11.5 hours per day across four ICPs). 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 currently rated as moderate, as there are good validation processes in place to detect and resolve unmetered load errors. A small number of errors were identified during the audit analysis of all ICPs with unmetered load. The audit risk rating is low because the impact on settlement is minor based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u> Correction has been made for the ICP 0000018605WECOF. Contact has been continuously improving this process since the last audit and will be reviewing the manual calculation process to reduce agent errors. We are working with our SAP technical team to create a new exception in the system to identify where UNM load details are removed in registry to resolve them in timely manner. New reporting has also been put in place and more users have been trained to resolve UNM exceptions.	<u>CTCT</u> Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u>	<u>CTCT</u>	

Reviewing the calculation process to reduce operator errors. Contact SAP team is investigating to develop a solution to trigger a notification in the system when UNM is removed in registry.	Ongoing	
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Distributed unmetered load		
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Non-compliance	Description	
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Audit Ref: 5.4 With: Clause 11 of schedule 15.3 From: 01-Jun-22 To: 31-May-23	<p>CTCT and CTCS</p> <p>The monthly database extracts used to derive submission from are provided as a snapshot and do not track changes at a daily basis as required by the code.</p> <p>Inaccurate submission information for six of the databases managed.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
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Audit risk rating	Rationale for audit risk rating	
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High	<p>The controls in place mitigate risk most of the time, therefore the control rating is moderate.</p> <p>There is a major impact on settlement outcomes because there are examples of over submission and under submission; therefore, the audit risk rating is high.</p>	
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Actions taken to resolve the issue	Completion date	Remedial action status
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<p><u>CTCT</u></p> <p>We do not currently supply DUML sites.</p>	<p><u>CTCT</u></p> <p>N/A</p>	Identified
<p><u>CTCS</u></p> <p>Discrepancies found in audits are discussed with clients promptly and work plans created to resolve discrepancies.</p>	<p><u>CTCS</u></p> <p>Ongoing</p>	

Preventative actions taken to ensure no further issues will occur	Completion date
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<p><u>CTCT</u></p> <p>N/A</p>	<p><u>CTCT</u></p> <p>N/A</p>
<p><u>CTCS</u></p>	<p><u>CTCS</u></p>

Simply Energy continues to work with clients to improve the accuracy of their databases and reporting that will flow through into improved submission accuracy. This includes transitioning to the new dimming profile(s) where appropriate, which is the most material issue affecting submission.	Ongoing	
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Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1 With: Clause 10.13</p> <p>From: 01-Apr-22 To: 08-May-23</p>	<p>CTCT</p> <p>ICP 0000048742HR7FB has RPS PV1 profile recorded, but no generation is present, and it should have RPS profile recorded on the registry. The correct profile is applied for submission.</p> <p>Two other ICPs had profiles indicating generation recorded on the registry when no generation was present and were corrected during the audit.</p> <p>Distributed generation ICPs 0419595066LC60F and 0000158421UN9EF do not have generation metering installed and have not been added to the gifting register.</p> <p>The metering for ICP 1001157629CK617 is not fit for purpose.</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 206 ICPs.</p> <p>CTCS</p> <p>Notice of gifting of generation for HHR ICPs 0005093997HBEBB and 0006804209RN6C3 was provided to the RM on 8 May 2023. Both ICPs have been supplied since 1 April 2022 but were not identified earlier because there was no specific check for generation metering for HHR ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they are sufficient to reduce the risk most of the time.</p> <p>The audit risk rating is low. Bridging only occurs where a soft reconnection cannot be performed after hours, and the customer urgently requires their energy supply for health and safety reasons.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u>	<u>CTCT</u> Ongoing	Identified

<p>Contact is in the process of investigating and correcting the SAP and Registry data for the ICPs identified by Veritek as being non-compliant.</p> <p><u>CTCS</u></p> <p>This was actioned on 8 May 2023.</p>	<p><u>CTCS</u></p> <p>08/05/2023</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>We will be investigating into opportunities to enhance our existing reporting and/or create additional reporting so we can identify and correct ICPs in these scenarios.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	
<p><u>CTCS</u></p> <p>New reporting has been created to detect any further ICPs and the first report was run in May 2023. This report will then be monitored actioned every 3 months as part of the Business Day Compliance schedule.</p>	<p><u>CTCS</u></p> <p>19/06/2023</p>	

Responsibility for metering at GIP	
Non-compliance	Description
<p>Audit Ref: 6.2</p> <p>With: 5 of Schedule 15.2</p> <p>From: 07-Oct-22</p> <p>To: 27-Nov-22</p>	<p><u>CTCT</u></p> <p>The certification date for WHI2201CTCTG was not updated within 10 business days of the NSP being certified.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>Controls are rated as moderate for the updating of GIPs meter recertifications.</p> <p>The audit risk rating is low as the meters were certified at all times and there was no impact on reconciliation.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u> Noted and will advise AccuCal of the requirement.	<u>CTCT</u> ASAP	Identified
Preventative actions taken to ensure no further issues will occur		
<u>CTCT</u> Contacts Energy Rec team will maintain a register of Certification Dates and will remind AccuCal of the requirement.	<u>CTCT</u> ASAP	

Derivation of meter readings		
Non-compliance	Description	
Audit Ref: 6.6 With: Clauses 3(1), 3(2) and 5 Schedule 15.2 From: 01-Jun-22 To: 31-May-23	<u>CTCT</u> Meter condition information is not consistently investigated to identify issues with seals, tampering, phase failure or safety. Potential impact: Medium 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 recorded as moderate because they are likely to mitigate risk most of the time. The inconsistency in investigating meter condition events appears to be due to lack of training relating to a small number of users. 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
<u>CTCT</u> Contact identifies issues with seals, tampering, phase failure, etc through BPEMs (Business Process Exception Monitoring) which are automatically generated within our SAP environment. We have identified where knowledge shortfalls exist that have impacted the consistency of investigating and accuracy of resolving meter condition information. Please refer to the	<u>CTCT</u> Ongoing	Identified

preventative actions field below to see how we intend to improve within this space.		
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT We are in the process of creating a process documentation that will assist our teams with consistently identifying the correct method for resolving meter condition issues raised via BPEMs. In addition, we will be organising training sessions and on-going refreshers to ensure we retain a high level of knowledge in this space.	CTCT Ongoing	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 01-Jun-22 To: 31-May-23	CTCT For two ICPs (0000005122DEF1D, 0000024655DE0E5) no actual meter read, or permanent estimate read was applied for the profile code event 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	The controls are recorded as moderate overall. The audit risk rating is assessed to be low based on the impact on settlement aggregation.	
Actions taken to resolve the issue	Completion date	Remedial action status
CTCT The Registry and SAP settlement data have been corrected to no longer reflect a profile change, resulting in actual meter read or permanent estimate read no longer being required.	CTCT 26/06/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT We will be investigating further into how the incorrect NHH profiles were created. Once the cause has been identified we will investigate further into potential fixes which would decrease the opportunity for these to arise in the future, as well	CTCT Ongoing	

as additional reporting to identify these scenarios at the earliest convenience so corrections can be made.		
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Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>For three ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>The meter read compliance process begins after 130 days with no readings so it is unlikely compliance will be achieved where the period of supply is less than this.</p> <p>CTCS</p> <p>For at least eight ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>The meter read compliance process begins after three months with no readings so it is unlikely compliance will be achieved where the period of supply is less than 90 days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as there are meter read compliance processes in place however these do not trigger until 130 and 90 days respectively.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>We will be utilising the three ICPs unread during their period of supply where exceptional circumstances did not exist, and the best endeavours requirement was not met, to explore internally and with our meter read service provider whether opportunities did exist to obtain a read, and where not, we will explore what possible improvements we could take to ensure the best endeavours requirement is met moving forward.</p> <p>Please refer to the preventative actions field for process improvements we are currently working on with our meter read service provider.</p>	<p>CTCT</p> <p>Ongoing</p>	<p>Identified</p>

<p>We would also like to acknowledge, where period of supply is short (e.g. less than 20 days), this could potentially result in the ICP not being added to a meter read cycle in time or the meter not being read, making achieving this compliance obligation highly unlikely. We do have some improvements to this space in mind, however, we would also be open to hearing recommendations from Veritek and the EA which may cater to these cases.</p> <p><u>CTCS</u></p> <p>The unread meter process has been improved with implementation from the 1st July and fully embedded by 30 Sep. The process is a monthly unread meter >3 months tracked and sent to Key & Account Leads for follow up contact. Any unread meters continuing to appear across multiple months will be linked with different contact methods up to 3 months. Account leads and Key account leads have now been refreshed on the requirements to contact the customer 3 times using two forms of communication (Phone and Email).</p>	<p><u>CTCS</u></p> <p>30/09/2023</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>Contact are currently in discussions with our Meter Reading service provider around the opportunities of implementing an SMS message service which would be sent to customers just prior to their scheduled meter read date. This new 'near real time' communication should help provide better access to meters and improve our ability to meet the best endeavours requirement moving forward.</p> <p>We will continue to explore further enhancements internally and with our meter read service provider as opportunities arise.</p> <p><u>CTCS</u></p> <p>Monthly reports are received from Wells on non meter reads > 3months and actioned by the Key and Account Leads Team. Additional information is being added to this report to show ongoing non reads so contact will then be made each month up to 3 months in a row.</p> <p>There are further reports in Salesforce that highlight unread meters as second verification.</p> <p>The way the customer is contacted will be linked to each month of non read to ensure multiple different ways to contact the customer are used.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>Ongoing</p>	

<p>Simply Energy can also now raise a "Special meter read" to Wells to action outside the normal read cycles. This will speed up the process of being able to send a meter reader back to a site to gain an actual read when additional access information is received from a customer.</p> <p>Simply Energy is also investigating the ability to automatically generate emails to the customer from salesforces for the first contact when they have been identified on the non read report.</p>		
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NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: clause 8(1) and (2) Schedule 15.2.</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCS</p> <p>For eight of a sample of 20 ICPs unread in the 12 months ending 31 March 2022, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>Controls are rated as moderate as they have improved during the audit period, and all unread ICPs are now reviewed monthly, and contact with the customer or MEP is initiated.</p> <p>The impact on settlement and participants is expected to be minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCS</p> <p>The unread meter process has been improved with implementation from the 1st July and fully embedded by 30 Sep. The process is a monthly unread meter >3 months tracked and sent to Key & Account Leads for follow up contact. Any unread meters continuing to appear across multiple months will be linked with different contact methods for up to 3 months. Account leads and Key account leads have now been refreshed on the requirements to contact the customer 3 times using two forms of communication (Phone and Email).</p>	<p>CTCS</p> <p>30/09/2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	

<p><u>CTCS</u></p> <p>Monthly reports are received from Wells on non meter reads > 3months and actioned by the Key and Account Leads Team. Additional information is being added to this report to show ongoing non reads so contact will then be made each month up to 3 months in a row.</p> <p>There are further reports in Salesforce that highlight unread meters as second verification.</p> <p>The way the customer is contacted will be linked to each month of non read to ensure multiple different ways to contact the customer are used.</p> <p>Simply Energy can also now raise a "Special meter read" to Wells to action outside the normal read cycles. This will speed up the process of being able to send a meter reader back to a site to gain an actual read when additional access information is received from a customer.</p> <p>Simply Energy is also investigating the ability to automatically generate emails to the customer from salesforces for the first contact when they have been identified on the non read report.</p>	<p><u>CTCS</u></p> <p>Ongoing</p>	
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NHH meters 90% read rate	
Non-compliance	Description
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>For one ICP unread in the four months ending 31 March 2022, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>CTCS</p> <p>For five ICPs unread in the four months ending 31 March 2022, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>Controls are rated as moderate as they have further improved during the audit period.</p> <p>For CTCS all ICPs unread for more than three months are reviewed monthly, and contact with the customer or MEP is initiated.</p> <p>The impact on settlement and participants is expected to be minor; therefore, the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>We will be utilising the ICP unread in the four months ending 31 March 2022 where exceptional circumstances did not exist, and the best endeavours requirement was not met, to explore internally and with our meter read service provider whether opportunities did exist to obtain a read, and where not, we will explore what improvements we to the ensure best endeavours requirement is met moving forward.</p> <p>Please refer to the preventative actions field for process improvements we are currently working on with our meter read service provider.</p> <p><u>CTCS</u></p> <p>The unread meter process has been improved with implementation from the 1st July and fully embedded by 30 Sep. The process is a monthly unread meter >3 months tracked and sent to Key & Account Leads for follow up contact. Any unread meters continuing to appear across multiple months will be linked with different contact methods up to 3 months. Account leads and Key account leads have now been refreshed on the requirements to contact the customer 3 times using two forms of communication (Phone and Email).</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>30/09/2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact are currently in discussions with our Meter Reading service provider around the opportunities of implementing an SMS message service which would be sent to customers just prior to their scheduled meter read date. This new 'near real time' communication should help provide better access to meters and improve our ability to meet the best endeavours requirement.</p> <p>We will continue to explore further enhancements internally and with our meter read service providers as opportunities arise.</p> <p><u>CTCS</u></p> <p>Monthly reports are received from Wells on non meter reads > 3months and actioned by the Key and Account Leads Team. Additional information is being added to this report to show</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p><u>CTCS</u></p> <p>Ongoing</p>	

<p>ongoing non reads so contact will then be made each month up to 3 months in a row.</p> <p>There are further reports in Salesforce that highlight unread meters as second verification.</p> <p>The way the customer is contacted will be linked to each month of non read to ensure multiple different ways to contact the customer are used.</p> <p>Simply Energy can also now raise a "Special meter read" to Wells to action outside the normal read cycles. This will speed up the process of being able to send a meter reader back to a site to gain an actual read when additional access information is received from a customer.</p> <p>Simply Energy is also investigating the ability to automatically generate emails to the customer from salesforces for the first contact when they have been identified on the non read report.</p>		
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Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3) Schedule 15.2</p> <p>From: 11-Jul-22</p> <p>To: 11-Jul-22</p>	<p>CTCS</p> <p>Three switch move ICPs had incorrectly labelled switch event meter readings.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are recorded as strong because a small number of exceptions were identified, and no exceptions were identified after July 2022.</p> <p>The impact on settlement and participants is low. Applying the read type "E" does not impact on other traders' ability to issue read renegotiation requests under clause 6(2) and (3) Schedule 11.3, and the read values were correct so there is no impact on settlement or the customer.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCS</p> <p>This historic issue cannot be corrected.</p>	<p>CTCS</p> <p>NA</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCS</p>	<p>CTCS</p>	

<p>A QA process was implemented on 01/11/2022, where a backup person checks that the data is correct then gives the final approval. This process will be automated in Phase 2 of the Switching Automation currently scheduled for Quarter 3 of 2023.</p>	<p>Quarter 3 of 2023</p>	
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Meter data used to derive volume information		
Non-compliance	Description	
<p>Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Jun-22 To: 31-May-23</p>	<p>CTCT Raw meter data is truncated upon upload into SAP meter read table and not when volume information is created. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>CTCT The controls are considered weak, because all NHH meter information is rounded before it is entered into SAP meter readings table where reconciliation submissions are calculated from. The audit risk rating is low, because only NHH meter readings provided with decimal places are affected</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u> We are exploring what options we have to remedy this in our system.</p>	<p><u>CTCT</u> Ongoing</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u> Please refer to actions taken to resolve this.</p>	<p><u>CTCT</u> N/A</p>	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15 Schedule 15.2</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>Reasonable endeavours to ensure CTCT has provided it's best estimate of consumption volume not met for a sample of six "active" long term non-communicating AMI metered ICPs where estimations are provided for more than 1,000 days and the estimates are not aligned with received meter reads from manual meter reading.</p> <p>Interval data consumption not correctly estimated for AMI meter changes to ensure the interval data matches the consumption calculated between meter reads.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are moderate, estimates are created by IMDM however by not comparing the estimated consumption with received manual meter readings or addressing the communication issue there is risk of consumption relating to these ICPs not being accounted for in the reconciliation process.</p> <p>The impact is assessed to be low due to the small number of HHR meter changes. The impact of the extended estimation of non-communicating AMI metered HHR ICPs is unknown.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact is working with our system provider to investigate and improve the estimation process for interval data in meter change scenarios.</p> <p>We are also collaboratively working with our interval data providers to ensure part day of AMI data is delivered to reduce the re-occurrence of this issue.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact system provider is investigating to develop a solution to improve estimation process, and consistently collaborating with interval data providers to ensure AMI data is</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	

	<ul style="list-style-type: none"> the assessed impact of the lack of HHR volume correction for ICP 0110003151EL984 was more than 10,000 kWh, and the impact of the number of ICPs outside the max interrogation cycle is unknown and these are metering installation category one ICPs in most cases. 	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p><u>AMI event logs</u></p> <p>Despite us making steady improvements to our processes and systems (post last audit) to routinely review AMI event logs provided by MEPS, we acknowledge there is still knowledge gap which has resulted in the event logs not being monitored as routinely as they should.</p> <p>We will continue to review the AMI event logs as they are received.</p> <p>To ensure a continued improvement in this space we will also be investigating potential opportunities to further increase the knowledge of those reviewing the logs and potential enhancements to our process. Please refer to the preventative action field for further information on the improvements we are intending to make and/or investigate.</p> <p><u>Time Sync issues</u></p> <p>We are exploring what options we have to remedy this in our system.</p> <p><u>Volume correction not applied due to a phase failure.</u></p> <p>We are working to complete a volume correction.</p> <p><u>HHR AMI data incorrectly replaced by estimates due to inaccurate midnight reads used for sum-check validation.</u></p> <p>We are actively engaging with meter owners to resolve this issue. Inaccurate midnight read issue is mostly occurring on a specific meter type and meter owner has an initiative in place to replace these meters in the field.</p> <p>Contact is also working with our service provider to improve existing reporting which will be utilized to get meter owners to prioritize update/replace the problematic meters.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p>Ongoing</p> <p>TBC</p> <p>Ongoing</p>	<p>Identified</p>

<p><u>CTCS & CTCX</u></p> <p>The Simply Energy Technology team are scheduled to build a Dashboard in the next two months so that the operational teams can start monitoring Event Logs.</p>	<p><u>CTCS & CTCX</u></p> <p>31/08/2023</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p><u>AMI event logs</u></p> <p>We will be enhancing our documentation to ensure they are fit for purpose and provide the required information our staff need to review AMI event logs accurately and routinely.</p> <p>We will also be investigating with the MEPs what opportunities there may be to standardise the formats for AMI event log files to provide consistency across all the MEPs we use, which entail would further simplify the reviewing and resolving of issues arising.</p> <p><u>HHR AMI data incorrectly replaced by estimates due to inaccurate midnight reads used for sum-check validation.</u></p> <p>Proactively working with meter owners to replace the meters in the field and developing better reporting in the system to get MEP to prioritize the replacement of meters.</p>	<p><u>CTCT</u></p> <p>Ongoing</p> <p>Ongoing</p>	
<p><u>CTCS & CTCX</u></p> <p>Once the Dashboard is completed the process around monitoring Event Logs will be created and become part of BAU.</p>	<p><u>CTCS & CTCX</u></p> <p>31/10/2023</p>	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Jun-22 To: 31-May-23	CTCT 20 revision differences were caused by inaccurate ICP days submission data because incorrect settlement unit information was recorded in SAP. The errors were corrected by the time that the audit was complete. 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 overall. Workarounds are in place to identify and correct ICPs with missing or incorrect settlement units and submission types, but they are not always resolved prior to submission. The impact is assessed to be low because corrected data will be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u> Incorrect Settlement Unit Assignments Energy Rec team to raise system defect to identify why SAP system auto-triggers do not successfully update the settlement units in below areas which are all impacting ICP Days Accuracy between SAP and Registry for both HHR and NHH Submission Types : <ul style="list-style-type: none"> ○ Disconnection/Reconnections. ○ Switch Withdrawals. ○ Customer Move-Outs/Vacant Sites. ○ Device Replacements. ○ Un-Metered Load ○ SAP Product Changes (TOU). Energy Rec team performs a one-off reconciliation of existing exceptions, ensuring all are resolved and ICP Days accurately submitted going forward.	<u>CTCT</u> 30/11/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> Energy Rec team to establish more robust exception reporting ensuring exceptions are identified and provided to the appropriate teams to correct in a timely manner.	<u>CTCT</u> 30/09/2023	

As part of preventative work, we will complete a review of resources required to manage identification and resolution of exceptions to ensure data inaccuracies are identified and resolved in a timely manner.		
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HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.4 With: Clause 15.8</p> <p>From: 01-Jun-22 To: 31-May-23</p>	<p>CTCT</p> <p>Four ICPs had changes to the NSP assignment on the registry where SAP had not reflected this change.</p> <p>17 ICPs were where the ICP had transitioned to NHH submission type on the registry however the settlement unit assignment in SAP remained HHR.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are moderate, as the ICP missing reports are reviewed every two months.</p> <p>The impact is low, because the NSPs are within the same balancing area and revised submission information will be washed up and the additional ICP days scaling applied will be removed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>All 4 NSP changes have been corrected within SAP.</p> <p>For 3 out of the 4 NSP changes, data inaccuracies were a result of back dated NSP changes being loaded within the Registry, with two of those changes being backdated ten years.</p> <p>Due to system limitations, correcting a severely backdated NSP change in SAP requires us to reverse customers bills that post-date the NSP change. As this has a large impact to our customer, at no fault of their own, where there is no balancing area change as a result of the back dated NSP change, we tend to correct the NSP data moving forward.</p>	<p>CTCT</p> <p>Ongoing</p>	Identified

Our Energy Rec team is reviewing their current reporting to identify where any improvement can be made to increase accuracy and ensure corrections are made as soon as practicable.		
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> Contact runs BPEM and Data Bricks reports regularly to identify where the NSP within the Electricity Registry and SAP differ. As data discrepancies are identified, the cause for the inaccurate data is investigated and the respective corrections actions are completed.	<u>CTCT</u> Ongoing	

Creation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 07-Oct-20</p>	<p>CTCT</p> <p>102 ICPs where the unmetered load settlement unit assignment was missing resulting in an under submission of 36,658 kWh per annum.</p> <p>235 ICPs where the unmetered load settlement unit assignment was not end dated on the removal of the unmetered load resulting in an over submission of 45,460 kWh per annum.</p> <p>Some ICPs were missing from submissions due to data inaccuracies.</p> <p>Some corrections identified in the previous audit were not corrected and are now outside the revision cycle.</p> <p>Volume corrections were not applied for 48 bridged ICPs that have subsequently switched away.</p> <p>Volume corrections were not applied or applied incorrectly for four bridged ICPs from a sample of nine ICPs.</p> <p>ICP 0007118113RN739 inactive consumption was confirmed as being genuine however this volume (5,082 kWh) is missing from the submission process.</p> <p>66 ICPs the inactive consumption was confirmed as being genuine however corrupt settlement unit assignments are preventing these ICPs from being included in submission totalling 29,112 kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p>

To: 31-May-23	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate overall. Improvements are required to some of the controls.</p> <p>The impact is high based on the volume differences identified, and corrected data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>ICP 0007118113RN739</p> <p>Contact is currently in the process of correcting the respective data to ensure all genuine consumption missing from the submission process is included.</p> <p>Bridged Meters</p> <p>We will complete a reconciliation of existing corrections for accuracy, including apply consumption corrections for Bridged ICPs not yet corrected and ensure that the volumes are correctly applied for submission based on the submission type for the affected ICP.</p> <p>Un-Metered Load Settlement Units</p> <p>Contact will complete corrections of SAP-Registry E_UNM Settlement Unit exceptions identified.</p> <p>Incorrect Settlement Unit Assignments</p> <p>We will raise a system defect to identify why SAP system auto-triggers do not successfully update the settlement units in below areas which are all impacting ICP Days Accuracy between SAP and Registry for both HHR and NHH Submission Types:</p> <ul style="list-style-type: none"> ○ Disconnection/Reconnections. ○ Switch Withdrawals. ○ Customer Move-Outs/Vacant Sites. ○ Device Replacements. ○ Un-Metered Load. ○ SAP Product Changes (TOU). <p>Our Energy Rec team performs a one-off reconciliation of existing exceptions, ensuring all are resolved and HHR and NHH submitted accurately going forward.</p>		<p><u>CTCT</u></p> <p>30/09/2023</p> <p>30/09/2023</p> <p>30/11/2023</p> <p>30/09/2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Bridged Meters</p> <p>Contact will investigate its processes in details to identify room for improvements.</p> <p>Un-Metered Load Settlement Units</p> <p>Contact has effective processes in place to ensure the correct UNM installation fact is applied in SAP for newly gained ICPs.</p> <p>Incorrect Settlement Unit Assignments</p> <p>Our Energy Rec team will establish more robust exception reporting ensuring exceptions are identified and provided to the appropriate team to correct in a timely manner.</p> <p>Contact will investigate its processes in detail to identify room for improvements.</p>	<p><u>CTCT</u></p> <p>30/09/2023</p>	

Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Dec-21</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
<p>High</p>	<p>The controls are moderate overall, and Contact is working to investigate issues and improve controls.</p> <p>The impact is high based on the volume differences identified, and that corrected data has not yet been prepared in some instances.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Seasonal shapes not applied for some ICPs</p> <p>Issue raised with SAP team and investigation revealed cause is NSP did not have their Balancing Area updated when there has been a change. Energy Rec team to check all NSPs and correct Balancing Area where required.</p> <p>Double metered Installation - 1001157629CK617</p> <p>Meeting conducted with WE* Connections Team Leader and physical options identified to resolve double metering situation received on 30/5/2023; including recommendation that a full site electrical layout from the customer's electrician be requested by CTCT to confirm all connections on the site, how they are connected & the corresponding ICP to each connection.</p> <p>We will follow-up with Business Account Managers and ensure the required actions for remediation are initiated.</p> <p>Consumption on ICPs with inactive status</p> <p>We will raise a system defect to identify why SAP system auto-triggers do not successfully update the settlement unit from E_DISC_INA to E_NH or E_HHE when reconnections are completed in SAP/Registry. This will identify whether a system or BAU processing issue is the root cause.</p> <p>Our Energy Rec team and Registry Analyst will collaboratively investigate opportunities to enhance existing reporting and/or create new reporting to identify discrepancies between SAP Settlement Unit and Registry Active/Inactive statuses.</p> <p style="padding-left: 40px;">This includes completing a one-off reconciliation of existing exceptions, ensuring all are resolved and consumption successfully submitted going forward.</p> <p>Contact will also review where the responsibility to manage ICP exceptions via SAP Report ZIN_EXT_SETTL_OPERAT best sits to ensure that in conjunction with the SAP BPEMS being monitored and worked, that all exceptions are identified and resolved by the appropriate teams in a timely manner.</p> <p>Incorrect Settlement Unit Assignments</p> <p>We will raise system defect to identify why SAP system auto-triggers do not successfully update the settlement units in below areas which are all impacting ICP Days Accuracy between SAP and Registry for both HHR and NHH Submission Types:</p> <ul style="list-style-type: none"> • Disconnection/Reconnections. 	<p><u>CTCT</u></p> <p>ASAP</p> <p>30/11/2023</p> <p>31/08/2023</p> <p>30/09/2023</p> <p>30/11/2023</p>	<p>Identified</p>

From: 01-Jun-22 To: 31-May-23	Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak overall:</p> <ul style="list-style-type: none"> for CTCT there are processes to attain readings and enter permanent estimates, but not all ICPs have permanent estimates entered by revision 14, and for CTCS and CTCX there are processes to attain readings, but there is no process to verify that best endeavours threshold has been met before entering permanent estimates. <p>There are sound estimation processes, therefore I have recorded the audit risk rating as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u> Issue of SAP process for use of Permanent Estimate was raised with our SAP team and under certain scenarios, the Permanent Estimate meter reading type was not applied. Investigation is on-going but has been delayed by Project Jarvis</p> <p><u>CTCS</u> Simply Energy are unable to correct submissions after 14 months.</p>		<p><u>CTCT</u> Ongoing</p> <p><u>CTCS</u> N/A</p>	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCS</u> A new process has been kicked off by the Simply Energy Customer Care Team to contact customers by two forms of communication, once this is confirmed and can be shown for all ICPs not read for 12 months then Simply Energy will generate Permanent Estimates.</p>		<p><u>CTCS</u> 31/01/2024</p>	

Reconciliation participants to prepare information	
Non-compliance	Description
Audit Ref: 12.9 With: Clause 2(1)(c) of schedule 12.3	<p>CTCT Four ICPs had changes to the NSP assignment on the registry where SAP had not reflected this change.</p>

<p>From: 01-Jun-22 To: 31-May-23</p>	<p>102 ICPs where the unmetered load settlement unit assignment was missing resulting in an under submission of 36,658 kWh per annum.</p> <p>235 ICPs where the unmetered load settlement unit assignment was not end dated on the removal of the unmetered load resulting in an over submission of 45,460 kWh per annum.</p> <p>ICP (0007118113RN739) the inactive consumption was confirmed as being genuine however this has not been resolved so this volume (5,082 kWh) is missing from the submission process</p> <p>66 ICPs where the inactive consumption was confirmed as being genuine however corrupt settlement unit assignments are preventing these ICPs from being included in submission totalling 29,112 kWh.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<p>High</p>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is high based on the volume differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u> <u>NSP Assignment Incorrect</u></p> <p>All 4 NSP changes have been corrected within SAP.</p> <p>For 3 out of the 4 NSP changes, data inaccuracies were a result of back dated NSP changes being loaded within the Registry, with two of those changes being backdated ten years.</p> <p>Due to system limitations, correcting a severely backdated NSP change in SAP requires us to reverse customers bills that post-date the NSP change. As this has a large impact to our customer, at no fault of their own, where there is no balancing area change as a result of the back dated NSP change, we tend to correct the NSP data moving forward.</p> <p><u>Un-Metered Load Settlement Units</u></p> <p>Our Energy Rec team will complete corrections of SAP-Registry E_UNM Settlement Unit exceptions identified.</p> <p><u>Incorrect Settlement Unit Assignments</u></p>	<p><u>CTCT</u></p> <p>26/06/2023</p> <p>30/09/2023</p>	<p>Identified</p>

<p>We will raise a system defect to identify why SAP system auto-triggers do not successfully update the settlement units in below areas which are all impacting Submission data accuracy between SAP and Registry for both HHR and NHH Submission Types:</p> <ul style="list-style-type: none"> ○ Disconnection/Reconnections (Inactive Settlement Units). ○ Switch Withdrawals. ○ Customer Move-Outs/Vacant Sites. ○ Device Replacements. ○ Un-Metered Load. ○ SAP Product Changes (TOU). <p>Energy Rec team performs a one of reconciliation of existing exceptions, ensuring all are resolved and HHR and NHH accurately submitted going forward.</p>	<p>30/11/2023</p> <p>30/09/2023</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p><u>NSP Assignment Incorrect</u></p> <p>Contact runs BPEM and Data Bricks reports regularly to identify where the NSP within the Electricity Registry and SAP differ. As data discrepancies are identified, the cause for the inaccurate data is investigated and the respective corrections actions are completed.</p>	<p><u>CTCT</u></p> <p>Ongoing</p>	

<p>Historical estimates and forward estimates</p>	
<p>Non-compliance</p>	<p>Description</p>
<p>Audit Ref: 12.10</p> <p>With: Clause 3 Schedule 15.3</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCS and CTCX</p> <p>Where SASV profiles are not available, consumption based on validated readings is not seasonally adjusted and is labelled as forward estimate.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
<p>Audit risk rating</p>	<p>Rationale for audit risk rating</p>

Low	<p>The controls are recorded as strong because historic and forward estimate is correctly identified most of the time.</p> <p>The audit risk rating is low as there is minor impact on settlement because while the volume calculation is correct but is not seasonally adjusted between consumption months.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCS & CTCX</u> Simply Energy are unable to correct previous FE reporting.		<u>CTCS & CTCX</u> N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCS & CTCX</u> End of month reads are now uploaded for UML ICPs. 100% HE is achieved on these; however, a new issue was identified in the NHH DA system where the system was incorrectly looking for a shape value on the end date of the Consumption Period + 1 incorrectly which has resulted in a few ICPs having HE volume incorrectly reported as FE. Simply Energy is working with the system provider to correct this.		<u>CTCS & CTCX</u> 29/02/2024	

Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Jun-22 To: 31-May-23	CTCT CTCX CTCS Inaccurate forward estimate caused the thresholds not to be met in some instances. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact is low because Initial data is replaced with revised data and washed up.	
Actions taken to resolve the issue		Completion date
<u>CTCT</u>		<u>CTCT</u>
		Identified

<p>Primary cause is the unpredictability of rural/irrigation usage patterns. In addition, Covid and recent weather events have an impact on meter readings.</p> <p><u>CTCS & CTCX</u></p> <p>Simply Energy are unable to correct previous FE thresholds not being met.</p>	<p>N/A</p> <p><u>CTCS</u></p> <p>NA</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCS & CTCX</u></p> <p>A new process has been kicked off by the Simply Energy Customer Care Team to contact customers by two forms of communication, this will provide better read attainment and therefore better accuracy on Forward Estimate thresholds.</p>	<p><u>CTCS</u></p> <p>31/01/2024</p>	

Compulsory meter reading after profile change		
Non-compliance	Description	
<p>Audit Ref: 12.13</p> <p>With: Clause 7 Schedule 15.3</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT</p> <p>ICPs 0000005122DEF1D and 0000024655DE0E5 did not have an actual meter read present for the profile change.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>CTCT</p> <p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>The Registry and SAP settlement data have been corrected to no longer reflect a profile change, resulting in actual meter read or permanent estimate read no longer being required.</p>	<p><u>CTCT</u></p> <p>26/06/2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date
<p>CTCT</p> <p>We will be investigating further into how the incorrect NHH profiles were created. Once the cause has been identified we will investigate further into potential fixes which would decrease the opportunity for these to arise in the future, as well as additional reporting to identify these scenarios at the earliest convenience so corrections can be made.</p>	<p>CTCT</p> <p>Ongoing</p>

Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: 01-Jun-22</p> <p>To: 31-May-23</p>	<p>CTCT and CTCS</p> <p>Historic estimate thresholds were not met for some revisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Overall, the controls are assessed to be moderate because compliance is achieved in most instances.</p> <p>The impact is assessed to be medium based on the quantity of forward estimate, and number of NSPs where the historic estimate requirements were not met.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>Primary cause is the unpredictability of rural/irrigation usage patterns. In addition, there is the Covid and weather events related impact on meter readings.</p> <p>CTCS</p> <p>Simply Energy are unable to correct previous submissions.</p>	<p>CTCT</p> <p>CTCS</p> <p>NA</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCT</p> <p>CTCS</p>	<p>CTCT</p> <p>CTCS</p>	

<p>A new process has been kicked off by the Simply Energy Customer Care Team to contact customers by two forms of communication, once this is confirmed and can be shown for all ICPs not read for 12 months then Permanent Estimates can be generated.</p>	<p>31/01/2024</p>	
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