

# Compliance plan for Nova Energy Limited 2023

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 10.6, 11.2, 15.2</p> <p>From: 01-Mar-22 To: 31-May-23</p>	<p><b>TODD</b></p> <p>Some inaccurate data was not corrected as soon as practicable.</p> <p>Profile discrepancy on the day of meter change for upgrades and downgrades.</p> <p>Volume corrections for three ICPs with defective meters have not been applied.</p> <p>Volume corrections not applied for bridged ICP 0000542837TU334 between 22 July 2022 to 11 January 2023.</p> <p>Two unmetered load corrections applied without virtual boundary reads resulting in the apportionment of consumption volumes applied into incorrect periods.</p> <p>ICP 0000033012TCD70 switched in effective from 16 November 2019 on 19 October 2022. and consumption for submission periods from November 2019 to September 2021 has not been reported.</p> <p>ICP 0329488094LC1C3 did not have its HHR estimates for December 2022 replaced.</p> <p><b>WISE</b></p> <p>One ICP had an incorrect ANZSIC code which has now been updated.</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	
<b>Low</b>	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is low. Where statuses are incorrect, the reconciliation process ensures that all consumption is reported. Status inaccuracies can have a minor impact on ICP days submissions.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Some inaccurate data was not corrected as soon as practicable.</p> <ul style="list-style-type: none"> <li>See sections 3.3, 3.5, 3.8, &amp; 6.1</li> </ul> <p>Profile discrepancy on the day of meter change for upgrades and downgrades.</p> <ul style="list-style-type: none"> <li>Process will be updated to change registry profile between HHR and RPS the day after a meter change instead of the day of the meter change.</li> </ul> <p>Volume corrections for three ICPs with defective meters have not been applied.</p>	Ongoing	Identified

- See section 6.4

Volume corrections for two bridged metered ICPs have not been applied.

- See section 6.4

Two unmetered load corrections applied without virtual boundary reads resulting in the apportionment of consumption volumes applied into incorrect periods.

- The process has been updated to include month end readings to prevent reoccurrence, but as these closed over 14 months ago the ICPs in question are unable to be corrected.

ICP 0000033012TCD70 switched in effective from 16 November 2019 on 19 October 2022. and consumption for submission periods from November 2019 to September 2021 has not been reported.

- ICP mix up with MERI. Backdated correction of ICPs 0000033012TCD70 & 0000033014TCCFF back to 2019 during Oct22.
- 2,168.45 kWh not submitted by TODD in Nov19-Sep21 R14 washups for 0000033012TCD70.
- A correction to capture the unreported consumption in the May22-Oct22 R14 washups has been made by inserting a May22 permanent estimate read into the billing system on 23/06/2023.

ICP 0329488094LC1C3 did not have its HHR estimates for December 2022 replaced.

- ICPs reconciled in STARK will be checked over to ensure there are no more outstanding ICPs that contain estimates that have not been replaced with actuals where actual data has been provided. Once these ICPs have been cleared out, any gaps in the process will be investigated to help prevent reoccurrence.

**WISE Response:**

One ICP had an incorrect ANZSIC code which has now been updated. See section 3.6

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b> Detailed outcomes are covered in the applicable sections of the audit document.</p> <p><b>WISE:</b> WISE will continue to focus on accuracy of event dates and complete and accurate information.</p> <p><b>HNET:</b> A weekly internal review process has been instigated to review all ICPs with PV1 profile to confirm if an export meter is connected.</p>	Ongoing	

<b>Retailer responsibility for electricity conveyed - access to metering installations</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.6 With: 10.7(2),(4),(5) and (6)  From: 01-Mar-22 To: 31-May-23	<b>HNET</b> Access was not arranged for one ICP 0436764334LC885 to enable the MEP to complete meter compliance work.  Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong as they are sufficient to mitigate risk most of the time. The audit risk rating is low because only one ICP was affected.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<b>HNET Response:</b> Non-Compliance accepted. HNET is in the process of coordinating a site visit with the customer and the MEP contractors to allow access for work to be completed.	31 August 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<b>HNET:</b> HNET will continue to work with MEPs to meet the code timeframes.	Ongoing	

<b>Electrical Connection of Point of Connection</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 2.11 With: 10.33A</p> <p>From: 03-Mar-22 To: 01-Feb-23</p>	<p><b>TODD</b> 38 ICPs did not have full certification within five business days of reconnection.</p> <p><b>WISE</b> Two ICPs did not have full certification within five business days of reconnection. ICP 0030284093PC947 was not recertified on resolution of the tamper.</p> <p><b>HNET</b> Three ICPs did not have full certification within five business days of reconnection. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls are recorded as strong. Processes are in place to identify metering certification issues and replace affected meters.</p> <p>The impact on settlement is recorded as minor because installations with expired or interim certification may be less accurate than certified metering installations</p>



<b>Meter bridging</b>			
<b>Non-compliance</b>	<b>Description</b>		
<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><b>TODD</b></p> <p>15 ICPs where the MEP was notified of a bridged meter later than one business day from when TODD was notified.</p> <p>Volume corrections not applied for bridged ICP 0000542837TU334 between 22 July 2022 to 11 January 2023.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
Low	<p>For TODD the controls are rated as moderate. While there was some reporting in place it was not effective during the audit period. Additional reporting was implemented during the field audit to identify through a key word query that scans across all returned service request paperwork looking for words and phrases that indicates a meter has been bridged or bypassed. The controls around processing corrections are not sufficient to ensure that these are consistently processed.</p> <p>The audit risk rating is low based on the number of ICPs with bridged meters identified.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p><b>TODD Response:</b></p> <p>Non-Compliance Is accepted.</p> <ul style="list-style-type: none"> <li>The MEP has been notified with jobs raised to resolve for the 15 identified meters in June 2023. See Section 6.4</li> <li>Volume correction for the impacted ICP is being processed and will be completed by 30 July 2023</li> </ul>		30 July 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
<p><b>TODD:</b></p> <ul style="list-style-type: none"> <li>Enhanced reporting for the identification of bridged meters has been established. See section 6.4.</li> <li>Further training and resource allocation for the management of stopped meters, including bridged and by-passed will be a focus for Nova moving forward.</li> </ul>		Ongoing	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: 10 Schedule 11.1  From: 01-Mar-22 To: 31-May-23	<b>TODD, HNET and WISE</b> Some registry information was not updated within five business days of the event. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls for the timeliness and accuracy of status and trader updates are moderate for TODD and have improved as the audit period progressed. HNET and WISE controls are also moderate. Errors are identified and corrected by both HNET and WISE as soon as possible however due to the manual nature of these processes human error cannot be eliminated. The audit risk rating is low this as the impact on submission accuracy is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>TODD Response:</b> Non-Compliance accepted. See Sections 3.5, 3.8 and 3.9 for further details <ul style="list-style-type: none"> <li>In all instances data integrity reporting identified the discrepancies as expected.</li> <li>Due to resource constraints, the corrective actions required following Nova's robust exception identification processes were not always completed during the audit period.</li> </ul> <b>WISE &amp; HNET Response:</b> Non-Compliance accepted. Some registry information was not updated within 5 business days of the event. <ul style="list-style-type: none"> <li>HNET &amp; WISE display ongoing commitment to timely status updates which is reflected in our compliance results.</li> </ul> In instances where backdated corrections are made, we elect to provide complete and accurate information and acknowledge this creates contention with Clause 10 Schedule 11.1.	Ongoing	Identified



Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>Nova has considered and redistributed internal workflows to improve resource availability to this area.</p> <p><b>WISE &amp; HNET:</b></p> <ul style="list-style-type: none"> <li>On-going work with our industry stakeholders to improve compliance time frames. Where required, we elect to provide complete and accurate information over timeliness.</li> </ul> <p>Our focus will continue to be on accuracy of event dates and complete and accurate information.</p>	Ongoing	

<b>Provision of information to the registry manager</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.5 With: 9 of schedule 11.1</p> <p>From: 03-Mar-22 To: 01-Feb-23</p>	<p><b>TODD</b></p> <p>249 late updates to “active” status for new connections.</p> <p>Four newly connected ICPs (of a sample of 18) had incorrect “active” status event dates. All were corrected during the audit.</p> <p><b>HNET</b></p> <p>Three late updates to “active” status for new connections.</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls are rated as moderate. Validation reporting is in place to detect potentially incorrect “active” status dates, but these are not always resolved in a timely manner. The audit risk rating is low, the discrepancies have been corrected or are in the process of being corrected.</p> <p>The late updates were caused by resourcing, corrections, or delays in receiving confirmation of the correct “active” status date, and/or waiting for other parties to correct their registry records.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <p>249 late updates to active status on New Connections.</p> <ul style="list-style-type: none"> <li>Nova completing compliant registry updates is impacted by MEPs providing accurate paperwork outside of retailer timeframes.</li> <li>This is compounded by EA rules requiring retailers to update ICP within 5 days, while allowing MEPs 10 days. As retailers are reliant on MEPs for completion paperwork this discrepancy on timeframes causes contention.</li> <li>Resource constraints within Nova have continued to cause delays in processing of paperwork once received. This is an area of ongoing focus.</li> </ul> <p>Four ICPS newly connected had incorrect "Active" status event dates recorded.</p> <ul style="list-style-type: none"> <li>All four ICPs were corrected during the audit. See Section 3.8</li> </ul> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>Three late updates to active status for New Connections</p> <p>All late updates were made due to late paperwork from the MEP confirming the correct initial electrically connected date.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <ul style="list-style-type: none"> <li>Nova is developing an improved method to track paperwork delays and reasons, to support closer management of MEP and contractor delivery.</li> <li>Dedicated resource to the processing of new connection paperwork was implemented in February 2023.</li> <li>Nova will continue to identify, develop, and implement processes to improve timely and accurate registry updates, and to work with our industry stakeholders to reduce the instances of late paperwork.</li> </ul> <p><b>HNET:</b></p> <p>On-going work with our industry stakeholders to improve timely delivery of completed paperwork upon job completion, to reduce instances of late updates</p>	Ongoing	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6 With: 9 (1(k) Schedule 11.1  From: 01-Mar-22 To: 31-May-23</p>	<p><b>TODD</b> Two ICPs had incorrect ANZSIC codes applied. These have been corrected.</p> <p><b>WISE</b> Incorrect ANZSIC code for ICP 0000130320UN5F0.</p> <p><b>HNET</b> Two incorrect ANZSIC codes. Potential impact: None Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls for TODD have increased to strong, now that validation reports have been expanded to include all ICPs. The exceptions occurred before the validation process was updated.</p> <p>Controls for HNET are moderate because most ANZSIC codes are checked on switch in, and a small number of exceptions were identified overall.</p> <p>Because most of the ICPs are supplied by TODD, and their processes are well designed and followed the controls are assessed to be strong overall.</p> <p>The audit risk rating is low this has no direct impact on submission accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b> Non-Compliance accepted. Eleven ICPs had incorrect ANZSIC codes applied.</p> <ul style="list-style-type: none"> <li>One corrected within audit</li> <li>Two have switched away and are unable to be corrected.</li> <li>Eight are currently under investigation.</li> </ul> <p><b>WISE Response:</b> Non-Compliance accepted. One ICP had incorrect ANZSIC codes applied.</p> <ul style="list-style-type: none"> <li>This was corrected during audit.</li> </ul> <p><b>HNET Response:</b> Non-Compliance accepted. Two ICPs had incorrect ANZSIC codes applied. All have been corrected during audit</p>	<p>31 August 2023</p> <p>31 May 2023</p> <p>31 May 2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>The eight under investigation were identified within existing reporting, the complexity to resolve has prevented this being updated on the registry.</p> <p><b>WISE:</b></p> <ul style="list-style-type: none"> <li>• WISE has implemented a monitoring tool to identify discrepancies in ANZSIC codes.</li> <li>• Refresher training will be provided to staff members to ensure immediate action is taken to correct identified discrepancies.</li> </ul> <p><b>HNET:</b></p> <p>HNET will implement an additional check when updating ANZSIC codes by validating the business address or verifying the code using the company register</p>	Ongoing	

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: 9(1)(f) of Schedule 11.1</p> <p>From: 21-Sep-18</p> <p>To: 13-Mar-23</p>	<p><b>TODD</b></p> <p>Five ICPs where unmetered load no longer present but unmetered load details recorded by TODD was not end dated.</p> <p>Three standard unmetered load ICPs were found to have a daily kWh value that was different to a calculation derived from the distributors UNM details information with an assessed impact of 2,394 kWh per annum.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Monitoring controls are well designed and identify new unmetered loads and unmetered load discrepancies daily. The reporting does not handle poorly formatted registry data to enable a comparison to be made and there is not current manual check performed for these ICPs.</p> <p>The audit risk rating is low this has the impact on submission accuracy is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> <li>Five ICPs are now reflecting correctly in both the registry and Orion.</li> </ul> <p>Three UML are currently being validated with the network and will be corrected once confirmation has been received.</p>	July 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <ul style="list-style-type: none"> <li>Nova accepts the recommendation from the auditor and will establish manual validation steps when a discrepancy is identified.</li> </ul> <p>Ongoing training will continue to support timely updates to UML in both Orion and the Registry.</p>	Ongoing	

Management of "active" status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: 17 Schedule 11.1</p> <p>From: 01-Mar-22</p> <p>To: 31-May-23</p>	<p><b>TODD</b></p> <p>Four newly connected ICPs (of a sample of 18) had incorrect "active" status event dates. All 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		
<b>Low</b>	<p>The controls are rated as moderate, validation reporting is in place to detect potentially incorrect "active" status dates, but these are not always resolved in a timely manner.</p> <p>The audit risk rating is low, the discrepancies have been corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <p>Four ICPs with incorrect first active dates. See Section 3.5</p> <ul style="list-style-type: none"> <li>All incorrect dates were entered because of human error.</li> <li>Data integrity reporting identified the discrepancies as expected.</li> </ul> <p>Due to resource constraints, the corrective actions required following Nova's robust exception identification processes were not always completed during the audit period. All corrections have now been made.</p>		30 May 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><b>TODD Response:</b></p> <p>See response to Section 3.5</p>		Ongoing	

<b>Management of “inactive” status</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.9</p> <p>With: 19 Schedule 11.1</p> <p>From: 15-Sep-21</p> <p>To: 31-May-23</p>	<p><b>TODD</b></p> <p>Seven ICPs with inactive consumption did not have their status updated to “active” for the periods with consumption.</p> <p>Five ICPs were recorded with incorrect status codes. Four were reversed and replaced and ICP 1002158202LC555 still has incorrect status reasons recorded for historic status records.</p> <p><b>WISE</b></p> <p>Two ICPs (0008112982HB234, 1002059298LCDEF) had incorrect status reason codes initially applied.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls are assessed to be strong overall:</p> <ul style="list-style-type: none"> <li>the incorrect status reason codes for TODD occurred due to training issues, and</li> <li>consumption on “inactive” ICPs is included in submission however the registry is now being updated consistently where “inactive” consumption is confirmed at an ICP.</li> </ul> <p>The impact was assessed to be low overall:</p> <ul style="list-style-type: none"> <li>for TODD the “inactive” status was correct although the reason code was not; there is no impact on volume or ICP days submissions, and</li> <li>for WISE two ICP initially had incorrect “inactive” status reason codes.</li> </ul>





Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <ul style="list-style-type: none"> <li>• Our focus will continue to be on accuracy of event dates and complete and accurate information.</li> <li>• Nova will monitor disconnected ICPs on an ongoing basis and where required update the Registry status.</li> <li>• Nova continues to look for opportunities for improvements.</li> <li>• Nova will review our threshold for consumption on inactive sites.</li> </ul> <p><b>WISE:</b></p> <p>WISE will continue to focus on accuracy of event dates and complete and accurate information. A focus will be placed on the on-going of training of staff to increase accuracy of statuses.</p>	Ongoing	

<b>Losing trader response to switch request and event dates - standard switch</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 4.2</p> <p>With: 3 and 4 Schedule 11.3</p> <p>From: 27-Sep-22</p> <p>To: 07-Dec-22</p>	<p><b>TODD</b></p> <p>Two ANs had the AD (advanced metering) response code applied when the AMI flag was set to N.</p> <p>16 ICPs had a proposed event date more than ten business days after the NT update date.</p> <p>The AN for two ICPs AN had the AA (acknowledge and accept) response code applied when the AMI flag was set to Y and the meter was constantly returning meter reads to TODD.</p> <p><b>WISE</b></p> <p>One AN had the AA (acknowledge and accept) response code applied when the AMI flag was set to Y and the meter was constantly returning meter reads to WISE.</p> <p>One AN had the OC (occupied premises) response code applied for a transfer switch when the AMI flag was set to Y and the meter was constantly returning meter reads to WISE where the correct code should have been AD.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>For TODD the controls the controls are assessed as strong as there have been improvements to the hierarchy logic for assigning response codes and the automated process used to determine the AN proposed event date now has an additional check in place to capture any incorrect proposed transfer dates prior to the AN file being uploaded to the registry.</p> <p>For WISE the controls are assessed as moderate due to the manual nature of the selection of the AN response code.</p> <p>Overall the controls are rated as strong.</p> <p>The audit risk rating is low as metering information is also available to the gaining trader directly from the registry.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b> Non-Compliance accepted.</p> <p>Two ICPs had response code AD (advanced metering) invalidly applied.</p> <ul style="list-style-type: none"> <li>The sites switched out prior to the implementation of the improved logic in March 2022.</li> <li>During audit it was identified that further improvement to the AN logic was required for time of day customers. This will be implemented by Q4 2023</li> </ul> <p>16 ICPs had a proposed event date more than ten business days after the NT update date due to a short window of time where our system did not correctly apply the built in process for request dates.</p> <ul style="list-style-type: none"> <li>The system issue impacted NT requests from 13 to 21 September 2022 only. This has not been an issue for Nova historically since implementing the system controls in 2020.</li> </ul> <p>Three AN responses had incorrect codes of AA instead of AD applied.</p> <ul style="list-style-type: none"> <li>As above improvement to the AN logic was implemented in March 2022</li> <li>Further improvement for TODD customers to be implemented by Q4 2023</li> </ul> <p><b>WISE Response:</b> Non-Compliance accepted. Two ICPs had incorrect response codes provided in the AN file. Both incorrect responses were sent by a staff member in training and were a result of human error.</p>	<p>March 2022</p> <p>Q4 2023</p> <p>September 2022</p> <p>March 2022</p> <p>Q4 2023</p> <p>June 2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <ul style="list-style-type: none"> <li>The AN logic implemented in March 2022 reduced instances of AN response code inaccuracy for AMI communicating meters. Further improvements for Time of Day customers only will be developed and implemented in Q4 2023.</li> <li>TODD has stood up an additional check before creating the AN files to ensure the logic to calculate event dates is working correctly to earlier identify and correct date calculations to minimise non-compliance should a system issue reoccur.</li> </ul> <p><b>WISE:</b></p> <p>Staff training will be on-going across all team members as well as new starters.</p>	<p>Q4 2023</p> <p>July 2023</p> <p>Ongoing</p>	

<b>Losing trader must provide final information - standard switch</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 4.3 With: 5 Schedule 11.3</p> <p>From: 13-Jun-22 To: 01-Dec-22</p>	<p><b>TODD</b> Four CS files were confirmed to have incorrect average daily consumption recorded. The CS file for ICP 0000520264EN644 recorded an incorrect last actual read date.</p> <p><b>WISE</b> Incorrect methodology used to calculate average daily consumption. The CS file for ICP 0000069500TRFC3 recorded an incorrect last actual read date.</p> <p><b>HNET</b> Average daily consumption was incorrect for 0005440530RN478. Potential impact: Low Actual impact: Low Audit history: Multiple times</p> <p>Controls: Strong Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>For TODD, the controls are assessed as strong as the logic since March 2022 ensures that average daily kWh reflects the daily consumption between the last two actual readings.</p> <p>For WISE, the controls over CS file generation rated as moderate because most file content is correct. The average daily consumption is not calculated as described in the Registry Functional Specification and the controls over this portion of the process are weak.</p> <p>For HNET, the controls over CS file generation rated as strong because most file content is correct and the system issue with removed meters being included in the daily average consumption calculation has been resolved.</p> <p>Overall, I have assessed the controls to be strong.</p> <p>The audit risk rating is assessed to be low as the average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP and the incorrect last read dates do not impact the accuracy of the switch end reads.</p>



Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <ul style="list-style-type: none"> <li>• Development to change the daily consumption calculation to last actual read-to-read period completed and delivered March 2022. No further non-compliances have been recorded since implementation.</li> <li>• For the incorrect read type being recorded, process documentation has been updated with refresher training for the relevant team who made the error.</li> </ul> <p><b>WISE:</b></p> <p>As above</p> <p><b>HNET:</b></p> <p>As above, the system logic will be modified to prevent removed meter consumption being included in the calculation of daily kwh.</p>	<p>March 2022</p> <p>Ongoing</p> <p>July 2023</p>	



Retailers must use same reading - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 6(1) and 6A Schedule 11.3</p> <p>From: 01-Mar-22</p> <p>To: 15-Dec-22</p>	<p><b>TODD</b></p> <p>The read type for one RR file was incorrectly recorded as actual instead of estimate.</p> <p>The read for one rejected RR file was not updated in Orion to reflect the provided CS read resulting in an under submission of 116 kWh.</p> <p>Two 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		
<b>Low</b>	<p>The controls over the read renegotiation process are strong. The incorrect RR files and failure to amend Orion with the outcome of the RR process were due to human error.</p> <p>The audit risk rating is low. The volume of late RR files was small and the volume impact from the incorrect read loaded into Orion from the rejected RR is also small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <p>One inaccurate read type recorded in a RR file.</p> <ul style="list-style-type: none"> <li>Human error resulted in a read being recorded as actual instead of estimate</li> </ul> <p>No corrective action was taken as there was no material impact to the customer or gaining retailer due to the volume being under 200kwh</p>		Not applicable no correction made	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><b>TODD:</b></p> <p>Nova will continue with on-going refresher training, review of processes and where possible identify improvement opportunities</p>		Ongoing	

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: 03-Mar-22</p> <p>To: 07-Dec-22</p>	<p><b>TODD</b></p> <p>The AN for five ICPs AN had the AA (acknowledge and accept) response code applied when the AMI flag was set to Y and the meter was constantly returning meter reads to TODD.</p> <p><b>WISE</b></p> <p>One E2 breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: One</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>For TODD the controls are assessed as strong as there have been improvements to the hierarchy logic for assigning response codes.</p> <p>For WISE the controls are assessed as moderate due to the manual processes employed and while a second operator is being trained in this task there is still little opportunity for any independent QA checks and process monitoring prior to submitting the AN file.</p> <p>Overall, the controls were assessed as strong, most switches are completed correctly, and the training period has been completed.</p> <p>The audit risk rating is assessed as low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD:</b></p> <p>Non-compliance accepted.</p> <p>Refer to section 4.2.</p> <ul style="list-style-type: none"> <li>Improved logic was implemented in March 2022 and further improvement will be deployed in Q4 2023</li> </ul> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>Refer to section 4.2.</p> <p>A new staff member was being trained and as a result human errors were made.</p>	<p>Q4 2023</p> <p>Ongoing</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b> As above</p> <p><b>WISE:</b> WISE will undertake process review to strengthen controls in conjunction with staff refresher training</p>	Ongoing	



Audit risk rating	Rationale for audit risk rating
<p><b>Low</b></p>	<p>For TODD, the controls are moderate overall:</p> <ul style="list-style-type: none"> <li>• the controls around the calculation of daily average consumption are assessed as strong as the logic since March 2022 ensures that average daily kWh reflects the daily consumption between the last two actual readings, and</li> <li>• controls are appropriately designed to ensure that correct switch reads and read types are provided, but the process is not always followed correctly, resulting in a small number of incorrect read types and last actual read dates; the audit risk rating is low because all read types are treated as validated or permanent estimates for switching, and the last actual read date can be used to help determine the accuracy of switch event dates but does not have a direct impact on the switching or reconciliation process.</li> </ul> <p>For WISE, the controls over CS file generation are rated as moderate because most file content is correct. The average daily consumption is not calculated as described in the Registry Functional Specification and the controls over this portion of the process are weak.</p> <p>For HNET the controls over CS file generation are rated as moderate because most file content is correct. HNETs use of disconnection reads and read dates where subsequent AMI actual reads are available does lead to potential errors when populating CS files.</p> <p>The audit risk rating is assessed to be low as:</p> <ul style="list-style-type: none"> <li>• the average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP, and the incorrect last actual read dates did not impact the gaining trader.</li> </ul>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-compliance accepted.</p> <p>For the incorrect average kwh calculation refer to section 4.3.</p> <p>All incorrect read types no action has been taken to correct on the registry as reversing the switch in order to correct has greater impact on the customer and gaining retailers than to leave the read type incorrect.</p> <ul style="list-style-type: none"> <li>• These errors were caused by the sites being moved to vacant accounts mid-switch. Billing has accepted the recommendation from the auditor and an additional report will be established prevent the moving of a site to a vacant account while a switch is in progress.</li> </ul> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>Calculation methodology see section 4.3.</p> <p>Three ICPs where the switch read type did not align with the last actual read date.</p> <ul style="list-style-type: none"> <li>• All a result of human error due to the manual nature of the switching process.</li> </ul> <p>000003166UNB7D had an incorrect read manually entered against register 2.</p> <ul style="list-style-type: none"> <li>• This has now been corrected via NW due to incorrect information being provided in the CS file.</li> </ul> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>Four ICPs had estimated reads entered when the last actual read date was the event date.</p> <p>This was the result of a timing issue between the read completing validation and the creation of the CS file. The process will be updated to ensure the CS creation only occurs after the read validation has completed thus including the final actual read.</p>	<p>March 2022</p> <p>Q3 2023</p> <p>January 2023</p> <p>July 2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b> Incorrect average daily consumption see response for section 4.3.</p> <p>As per the recommendation additional reporting will be implemented to prevent changes to ICPs during the switching process.</p> <p><b>WISE:</b> Ongoing staff training will continue to be provided.</p> <p><b>HNET:</b> As above.</p>	<p>March 2022</p> <p>Q3 2023</p> <p>Ongoing</p> <p>Ongoing</p>	

<b>Gaining trader changes to switch meter reading - switch move</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.11 With: 12 Schedule 11.3  From: 24-Aug-22 To: 03-Feb-23	<b>TODD</b> 22 RR breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls over the read renegotiation process are strong. A small number of RR breaches occurred because of delays in obtaining the two actual reads required to issue an RR.  The audit risk rating is low. The late RR files are expected to improve data accuracy, and revised reconciliation data is washed up once the RR process is completed.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<b>TODD Response:</b> Non-Compliance accepted.  22 late RR files for switch moves.  Nova maintains following best practices and only sends files outside of timeframe when required to correct invoicing for customers.	Not applicable	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<b>TODD:</b>  Nova will continue with ongoing refresher training, review processes and where possible identify improvement opportunities	Ongoing	



<b>Withdrawal of switch requests</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 4.15</p> <p>With: 17 and 18 Schedule 11.3</p> <p>From: 12-Jun-22</p> <p>To: 01-Dec-22</p>	<p><b>TODD</b></p> <p>NW (ICP 0000048335CP554) was issued in error.</p> <p>Six SR breaches.</p> <p>42 NA breaches.</p> <p><b>WISE</b></p> <p>Incorrect NW advisory code for one ICP.</p> <p>Five NA breaches.</p> <p>One SR breach.</p> <p><b>HNET</b></p> <p>Two NW's (ICPs 0125742304LC071 and 0080042437WE016) were issued in error.</p> <p>One SR breach.</p> <p>Three NA breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>Overall, the controls are assessed as strong.</p> <p>For TODD the controls over the withdrawal process are robust.</p> <p>For WISE the controls over the withdrawal process are moderate due to the manual nature of this process.</p> <p>For HNET the controls over the withdrawal process are moderate due to the manual nature of this process.</p> <p>The audit risk rating is assessed to be low as the impact to the market is minimal.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <p>NW (ICP 0000048335CP554) was issued in error.</p> <ul style="list-style-type: none"> <li>Human error due to misunderstanding the process when a gaining trader requests a backdated transfer date. The ICP was switched out on a compliant date.</li> </ul> <p>Six SR breaches</p> <ul style="list-style-type: none"> <li>0000156708CK555 was incorrectly sent NWs due to complex issues regarding landlord/tenant invoicing and responsibility.</li> <li>Nova considers it is in the best interest of the customer to correct data to invoice accurately and that we comply with Clause 11.2 of part 11 "to provide complete and accurate information".</li> </ul> <p>42 NA breaches</p> <ul style="list-style-type: none"> <li>Nova considers it is in the best interest of the customer to correct data to invoice accurately and that we comply with Clause 11.2 of part 11 "to provide complete and accurate information".</li> </ul> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>Incorrect NW advisory code for one ICP.</p> <ul style="list-style-type: none"> <li>The ICP had an incorrect code issued due to human error while a new staff member was in training. The site successfully completed the switch out process.</li> </ul> <p>Five NA breaches, one SR breach</p> <ul style="list-style-type: none"> <li>As with Nova, WISE considers it is in the best interest of the customer to correct data to invoice accurately and that we comply with Clause 11.2 of part 11 "to provide complete and accurate information".</li> </ul> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>Two NW's (ICPs 0125742304LC071 and 0080042437WE016) were issued in error.</p> <ul style="list-style-type: none"> <li>Both ICPs had incorrect codes issued due to human error while a new staff member was in training. Both successfully completed the switch out process.</li> </ul> <p>One SR breach. three NA breaches.</p> <p>As with Nova, HNET considers it is in the best interest of the customer to correct data to invoice accurately and that we comply with Clause 11.2 of part 11 "to provide complete and accurate information".</p>	Ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b> Process documentation and refresher training has been provided where human errors were made.</p> <p><b>TODD, WISE &amp; HNET:</b> Nova will continue with on-going refresher training, review processes and where possible identify improvement opportunities</p>	Ongoing	

<b>Electricity conveyed &amp; notification by embedded generators</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 6.1 With: 10.13</p> <p>From: 01-Mar-22 To: 28-Feb-23</p>	<p><b>TODD</b> While meters were bridged, energy was not metered and quantified according to the code for 19 ICPs. 18 from a sample of 20 ICPs had generation recorded by the distributor and I flow metering where TODD did not record a generation profile. Five ICPs with distributed generation do not have settled I flow registers installed and there is no record added to the gifting register.</p> <p><b>WISE</b> While meters were bridged, energy was not metered and quantified according to the code for 15 ICPs.</p> <p><b>HNET</b> While meters were bridged, energy was not metered and quantified according to the code for one ICP. For ten ICPs an incorrect profile code of PV1 was applied when no generation was present. ICP 0244638179LCF59 with distributed generation does not have settled I flow registers installed and there is no record added to the gifting register.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>Controls are moderate overall because they are not sufficient to ensure that bridged meters and distributed generation profile issues are promptly resolved. The audit risk rating is low based on the number of ICPs affected.</p>





Collection of information by certified reconciliation participant		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 10.43(2) and (3) From: 01-Mar-22 To: 31-May-23	<b>TODD</b> The MEP was not advised of 15 bridged meters. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate, the MEP are advised of defects in most circumstances, however for bridged meters there was no effective monitoring in place prior to the field audit. Additional reporting was implemented during the field audit to identify through a key word query that scans across all returned service request paperwork looking for words and phrases that indicates a meter has been bridged or bypassed. The audit risk rating is low based on the number of ICPs affected.	
Actions taken to resolve the issue		Completion date
<b>TODD Response:</b> Non-Compliance Is accepted. <ul style="list-style-type: none"> <li>The MEP has been notified with jobs raised to resolve for the 15 identified meters in June 2023.</li> </ul>		June 2023
Preventative actions taken to ensure no further issues will occur		Completion date
<b>TODD:</b> Reporting has been established to identify where the meter has been bridged or bypassed from contractor's job completion note details. The report is reviewed daily, and jobs are immediately raised to the MEP. This is in addition to the existing reporting to identify stopped meters in case the meters are bridged outside of contractor work.		June 2023
<b>Remedial action status</b>		
Identified		

Collection of information by certified reconciliation participant		
Non-compliance	Description	
Audit Ref: 6.5 With: 2 Schedule 15.2  From: 14-Jan-19 To: 31-May-23	<b>TODD</b> Three ICPs were not interrogated within their maximum interrogation cycle. Two have since switched out, and the other ICP is disconnected.  Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because most ICPs were interrogated within their maximum interrogation cycle, and AMS had attempted to resolve the issues preventing interrogation.  The impact is low because the ICPs are not expected to be consuming energy, and two of the ICPs have now switched out.	
Actions taken to resolve the issue		Completion date
TODD Response: Non-Compliance accepted. Monitoring and investigation occurred on all sites impacted. <ul style="list-style-type: none"> <li>Two are no longer with Nova.</li> </ul> One will be resolved when the mains are turned back on.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<b>TODD:</b> Monthly monitoring of missing data resulting in estimates for C&I TOU ICPs for billing and reconciliation.  Site visits are initiated to obtain data / restore comms in instances where a temporary vacancy is not expected.		Ongoing
Identified		



Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: 7(1) and (2) Schedule 15.2</p> <p>From: 01-Mar-22</p> <p>To: 28-Feb-23</p>	<p><b>TODD</b></p> <p>Exceptional circumstances were not proven for six of the ten ICPs sampled that were not read during the period of supply.</p> <p><b>HNET</b></p> <p>Exceptional circumstances were not proven for two ICPs that were not read during the period of supply.</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	
<b>Low</b>	<p>Controls are rated as moderate for TODD, the read attainment process for NHH non-AMI meters has been fully operational during the entire audit period meaning that the best endeavours requirements can now be attempted for most ICPs.</p> <p>Controls are rated as moderate for HNET as while there is an escalation path for recent gained ICPs beginning at 60 days, there will be instances where ICPs can transition in and out without within 60 days without best endeavours requirements being attempted.</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><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <p>Six ICPs did not have exceptional circumstances proven.</p> <ul style="list-style-type: none"> <li>Nova paused our consecutive estimate process during the height of COVID-19 restrictions. This was resumed with improved measures in June 2022</li> <li>All six ICPs were within the paused period, and therefore were not covered by the enhanced process now in place.</li> </ul> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>Both ICPs that were not interrogated during supply period had short supply periods and NHH meters. Attempts were made to gain reads and communication sent to customers to arrange access.</p>	June 2022	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b>  Nova's view is prioritising public safety throughout the COVID 19 response over meter read attainment was the appropriate approach. The enhanced process was re-established in June 2022 and our consecutive estimate volume has significantly decreased as a result. Nova will continue to look for opportunities to further improve our read attainment.</p> <p><b>HNET:</b>  HNET will continue to work with our industry stakeholders to ensure meters are interrogated during supply period wherever possible.</p>	Ongoing	

<b>NHH meters interrogated annually</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 6.9 With: 8(1) and (2) Schedule 15.2</p> <p>From: 01-Aug-21 To: 31-Jul-22</p>	<p><b>TODD</b> The best endeavours requirements were not met for ICP 0000039211TR55D that was not read during the previous 12 months.</p> <p><b>HNET</b> The best endeavours requirements were not met for ICP 0000446386UNECA that was not read during the previous 12 months.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are rated as moderate for TODD, the read attainment process for NHH non-AMI meters has been restarted meaning that the best endeavours requirements can now be attempted for most ICPs.</p> <p>Controls are rated as strong for HNET as the read attainment has escalation processes are robust where a customer can be identified.</p> <p>The controls are rated moderate overall.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
<p><b>TODD Response:</b> Non-Compliance accepted. See section 6.8</p> <p><b>HNET Response:</b> Non-Compliance accepted. ICP 0000446386UNECA was attempted to be read monthly by Wells but were unsuccessful due to difficulty accessing the meter. Access has now been secured and two actual meter readings have been attained.</p>		<p>June 2022</p> <p>June 2023</p>
		<b>Remedial action status</b>
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b> See section 6.8</p> <p><b>HNET:</b> HNET will continue to work with our contractors to identify opportunities for improvement.</p>	Ongoing	

<b>NHH meters 90% read rate</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.10 With: 9(1) and (2) Schedule 15.2  From: 01-Sep-22 To: 31-Dec-22	<b>TODD</b> The best endeavours requirements were not met for all ten ICPs sampled that were not read during the previous four months.  Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate for TODD, the read attainment process for NHH non-AMI meters has been restarted meaning that the best endeavours requirements can now be attempted for most ICPs.  The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<b>TODD Response:</b> Non-Compliance accepted. See section 6.8  The ten impacted ICPs were within the period that our process was paused due to the COVID-19 restrictions.	June 2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<b>TODD:</b> See section 6.8	Ongoing	

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: 3(3) Schedule 15.2  From: 06-Mar-22 To: 03-Feb-23	<b>TODD</b> One ICP which underwent RRs had incorrect switch read type recorded in Orion. Five ICPs had incorrect read types in CS files. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls over the read renegotiation process are strong, a small number of errors occurred where a step was missed when updating the readings.  The audit risk rating is low because there is no impact on the submission process; all switch event readings are treated as validated by the reconciliation process.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>TODD Response:</b> Non-Compliance accepted. Refer to Sections 4.4 and 4.10	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>TODD:</b> As above	Ongoing	

<b>Meter data used to derive volume information</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 9.3 With: 3(5) Schedule 15.2</p> <p>From: 1-Jun-20 To: 31-May-23</p>	<p><b>TODD and HNET for AMS and EDMI data collection</b> Prior to June 2022 the EIEP3 and GEN file format may round the trading period data to two decimal places if the meter does not have a multiplier and the volume for that hour has a non-zero value in the third decimal place.</p> <p><b>TODD AMI data</b> AMI readings with decimal places are rounded to zero decimal places on import into Orion, and the rounded readings are used to calculate submission data.</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls are rated as moderate because they are not sufficient to ensure that submission information is consistently calculated from unrounded data.</p> <p>For HHR, the impact is assessed to be low for the EIEP3 format, because a small number of ICPs are expected to be affected and the issue only affects the third decimal place under certain circumstances. There is no impact for the GENDF file format because EMS completes submission for GENH ICPs.</p> <p>For AMI, the impact is assessed to be low because the ICP level differences are expected to be very small, and the overall differences are expected to be small because there will be under and overs due to the rounding technique.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD &amp; HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>EIEP3 and GEN file formatting issue was resolved in June 2022, there has been no compliance issues since this was implemented.</p> <p><b>TODD Response:</b></p> <p>Non-Compliance disputed.</p> <ul style="list-style-type: none"> <li>• AMI reads rounding upon import into Orion issue still exists as complying with this interpretation of the clause would result in non-compliance with Schedule 11.3 clause 5 &amp; 11 and clause 6 (Traders must use same reading) and lead to volume inaccuracy in customer invoicing and submission; whereas using 0dp rounded reads does not introduce this overall inaccuracy into the switching process.</li> </ul> <p>The registry switching process would need to be changed to accept switch reads containing decimal places to address the inaccuracy issue raised above.</p>	June 2023	Disputed
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p><b>TODD:</b></p> <p>As above</p>	Ongoing	



Half hour estimates		
Non-compliance	Description	
Audit Ref: 9.4 With: 15 Schedule 15.2  From: 01-Jul-22 To: 01-Dec-22	<b>TODD</b> HHR estimates were not replaced by actual data for two ICPs as part of TODD's business as usual process. The estimates were replaced during the audit. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls over replacement of estimates for C&I HHR ICPs managed in Stark and HHR settled AMI meters managed in Orion are strong, because estimates are automatically replaced with actuals. The controls over HHR settled AMI ICPs which are managed in Stark because of the network's pricing requirements are weak, but will improve to strong now monitoring of the collection status for earlier months has been reinstated.  The impact is low because TODD intends to replace the estimates prior to revision 14.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>TODD Response:</b> Non-Compliance accepted. Both ICPs had the estimates replaced with actual data during the audit.	June 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>TODD:</b> ICPs reconciled in STARK will be checked over to ensure there are no more outstanding ICPs that contain estimates that have not been replaced with actuals where actual data has come through. Once these ICPs have been cleared out, any gaps in the process will be investigated to help prevent where actual data has come through and estimates have not been replaced with actual data.	Q3 2023	

<b>Electronic meter readings and estimated readings</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 9.6</p> <p>With: Clause 17 Schedule 15.2</p> <p>From: 01-Mar-22</p> <p>To: 31-May-23</p>	<p><b>TODD</b></p> <p>Stark meter events for generation meters are not being reviewed.</p> <p>AMI Meter event logs and time synchronisation reports are not consistently reviewed, and no formal process is in place to ensure complete reviews are conducted.</p> <p>Four ICPs with time synchronisation corrections between 3,597 and 3,602 seconds where no investigation or volume correction applied.</p> <p><b>WISE</b></p> <p>AMI Meter event logs are not consistently reviewed, and no formal process is in place to ensure complete reviews are conducted.</p> <p><b>HNET</b></p> <p>AMI Meter event logs are not consistently reviewed, and no formal process is in place to ensure complete reviews are conducted.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls for TODD are assessed as strong for TODD generation data because EMS produces generation volume submissions and also validates generation data, and moderate for TODD AMI as most AMI MEPs provide emails to TODD where action is required.</p> <p>Controls are assessed as moderate for WISE as most AMI MEPs provide emails to WISE where action is required.</p> <p>Controls are assessed as moderate for HNET as most AMI MEPs provide emails to HNET where action is required.</p> <p>The controls are rated moderate overall.</p> <p>The impact is assessed to be low, because events affecting accuracy should be identified and alerted by the MEPs via agreed SLAs between parties.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD</b>  Stark meter events for generation meters are not being reviewed.</p> <ul style="list-style-type: none"> <li>Nova has accepted the auditor’s recommendation. See response above.</li> </ul> <p>AMI Meter event logs and time synchronisation reports</p> <ul style="list-style-type: none"> <li>A process will be established to review reporting provided from MEPs and where issues exist immediately raise jobs to replace meters impacted.</li> </ul> <p>Four ICPs with time synchronisation corrections</p> <ul style="list-style-type: none"> <li>Jobs have been raised to replace impacted meters with time synchronisation issues.</li> <li>Once completed volume corrections will be applied to all impacted ICPs.</li> </ul> <p><b>WISE</b>  WISE is developing an event logging process within their system with the support of the MEPs to identify impacted meters and resolve any issues.</p> <p><b>HNET</b>  AMI Meter event logs and time synchronisation reports</p> <p>A process will be established to review reporting provided from MEPs and where issues exist immediately raise jobs to replace meters impacted</p>	Q3 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD, WISE &amp; HNET:</b>  As above and in recommendation responses</p>	Q3 2023	



Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Two ICPs were impacted by backdated profile changes. This resulted in data being held in both Orion and Stark for the same period. The incorrect data has been removed from Stark resolving the reconciliation non-compliance.</p> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>Of the issues identified, all had been resolved or correctly submitted in R14 reversion.</p> <ul style="list-style-type: none"> <li>0467242143LC5D5 was still incorrect due to a overwrite of the status in the database. This has now been corrected and additional scripts implemented to safeguard against recurrence.</li> </ul> <p><b>HNET Response:</b></p> <p>Unable to identify the non-compliance in the AV110 HHR ICP days as the submissions appear to have been provided in accordance with 15.6. The issue with zeroing appears to result from legacy behaviour in the RM's system that is not supported by the Code, rather than because of non-compliant trader submissions.</p> <p>Four NHH ICP day differences were a result of human error. This was correctly submitted in R14 reversion.</p>	June 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>A review will be conducted to account for any additional gaps where we have additional data where a site has changed from TOU to HHR/RPS where there is additional data still on STARK that is causing duplicates in the system.</p> <p>We will review any training gaps from handover where there has been staff changes to determine any gaps in the discrepancy reporting to ensure that these are identified, and actions taken to correct these are done in a timely manner.</p> <p><b>WISE:</b></p> <p>Preventative scripts have been implemented to mitigate status's being incorrectly updated in the database.</p> <p><b>HNET:</b></p> <p>As above. HNET will continue to monitor the situation to ensure compliance is achieved and maintained.</p>	Q3 2023	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: 15.8  From: 01-Sep-22 To: 31-May-23	<b>TODD</b> ICP 0005083575RN47D had an incorrect volume recorded in the September 2022 aggregates file. ICP days and volumes were duplicated for ICP 0003875008AL995 for December 2022 because it was active in the Orion and Stark as HHR, which resulted in over submission of 28,574.3 kWh.  Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong. The process is operating correctly, and the issues resulting in inaccurate consumption appear isolated.  The audit risk rating is low because revised submission information will be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>TODD Response:</b> Non-Compliance accepted.  ICP 0005083575RN47D had an incorrect volume recorded in the September 2022 aggregates file from 09/08/2022 due to a meter being set up in the billing system on two serial numbers simultaneously, <ul style="list-style-type: none"> <li>The billing system was corrected 08/06/2023 and the impacted months will be washed up.</li> </ul> ICP 0003875008AL995 ICP days and volume were duplicated for December 2022. See Section 11.2	June 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>TODD:</b> See response to 11.4 recommendation and to Section 11.2	Ongoing	

<b>Creation of submission information</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 12.2 With: 15.4</p> <p>From: 16-Nov-19 To: 31-May-23</p>	<p><b>TODD</b> Alleged breach 2205NOVE1 for late provision of submission information. 1000510763PC9CF was upgraded from NHH to TOU on 21 December 2022. The profile change coincided with a network pricing change. The HHR meter was not properly set up in Stark to receive data until a meter change on 7 February 2023. Zeros had been estimated from 21 December 2022 until 6 February 2023. ICP 0000033012TCD70 switched in effective from 16 November 2019 on 19 October 2022. Correctly calculated volumes have been included in NHH submissions for the October 2021 submission period onwards, but consumption for submission periods from November 2019 to September 2021 has not been reported.</p> <p><b>WISE</b> GR-100 ICP Days comparison report identified 21 ICPs were missing from either R7 or R14 revision submission due to PEBS not correctly reflecting registry "active" status. Incorrect ICP days for 18 combinations on NSP/consumption month due to PEBS not correctly reflecting the registry status for 21 ICPs.</p> <p><b>HNET</b> Alleged breach 2208NOVE2 for incorrect provision of HHR data and ICP days. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls over timeliness and accuracy of submission data are strong. The exceptions were caused by incorrect inputs into the process rather than systemic issues.</p> <p>The audit risk rating is low based on the volume of under and over submission, and that the late submission was three minutes late.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> <li>Alleged Market Breach already responded to.</li> <li>Backdated actual data has been imported for 1000510763PC9CF in STARK to cover the missing data from 21/12/2022 – 06/02/2023.</li> <li>Backdated switch over 14 months 0000033012TCD70 see section 2.1</li> </ul> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>See section 11.2</p> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> <li>Alleged Market Breach already responded to.</li> </ul>	<p>June 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>TODD will update their process to include more detailed records to ensure that backdated meter changes and backdated profile changes so not result in duplicated data or missing data.</p> <p>See responses to recommendations for section 12.2</p> <p><b>WISE:</b></p> <p>See section 11.2</p>	<p>June 2023</p>	



<b>Accuracy of submission information</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 12.7 With: 15.12</p> <p>From: 16-Nov-19 To: 31-May-23</p>	<p><b>TODD</b> Alleged breach 2205NOVE1 for late provision of submission information. Some inaccurate submission information was not corrected as soon as practicable.</p> <p><b>WISE</b> Some inaccurate submission information was not corrected as soon as practicable.</p> <p><b>HNET</b> Alleged breach 2208NOVE2 for incorrect provision of HHR data and ICP days. Some inaccurate submission information was not corrected as soon as practicable.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls over accuracy of submission data are moderate. The NHH exceptions were caused by incorrect inputs into the process rather than systemic issues except for HNET where a meter installed on the last day of a month was resulting in incorrect ICPs days being reported.</p> <p>Late delivery submission files had a minor impact to the RMs ability to start the reconciliation process.</p> <p>The audit risk rating is low based on the volume of under and over submission.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <p>Refer to individual sections 2.1, 3.7, 4.4, 9.4, 11.2, 11.4, 12.2.</p> <p>Meter change and profile change submission inaccuracies</p> <ul style="list-style-type: none"> <li>• 0005083575RN47D see Section 11.4</li> <li>• 0003875008AL995 see Section 11.2</li> <li>• 1000510763PC9CF see Section 12.2</li> </ul> <p>Missing submission information for backdated switch</p> <ul style="list-style-type: none"> <li>• 0000033012TCD70 see Section 2.1</li> </ul> <p>Unmetered load submission inaccuracies</p> <ul style="list-style-type: none"> <li>• See section 3.7</li> </ul> <p>Replacement of HHR estimates</p> <ul style="list-style-type: none"> <li>• See section 9.4</li> </ul> <p>Outcome of the RR process not reflected in Orion</p> <ul style="list-style-type: none"> <li>• 0000213279UND34see Section 4.4</li> </ul> <p>Defective Meters</p> <ul style="list-style-type: none"> <li>• See section 2.1</li> </ul> <p>Alleged Market Breach already responded to.</p> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>Refer to sections 11.2 and 12.2</p> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>PV1 non-compliance refer to section 6.1</p> <p>Alleged Market Breach already responded to.</p>	Ongoing	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p><b>TODD, WISE &amp; HNET:</b></p> <p>As above.</p>	Ongoing	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: 4 Schedule 15.2</p> <p>From: Aug-21 to Oct-21 r14</p>	<p><b>TODD</b></p> <p>TODD does not enter permanent estimate readings before revision 14 is created, and some forward estimate remains at revision 14.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are weak because permanent estimates are not entered.</p> <p>The impact is low, because TODD's validation process should ensure that estimates created for ICPs not read in the last 14 months are reasonable.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> <li>• Previous staff applied the permanent estimate process along with an investigation of each ICP to evaluate its eligibility for a permanent estimate i.e. to establish whether reasonable endeavours had been used for at least 12 months prior to being able to apply a permanent estimate for an ICP.</li> <li>• The training around evaluating the eligibility of an ICP, calculating, checking, and inserting a permanent estimate reading into the billing system has not yet been passed over to new staff members.</li> </ul> <p>Nova will seek to clarify the interpretation of the Code around eligibility when applying a permanent estimate, to see if this eligibility check is required or can be simplified to apply an automated solution.</p>	December 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>Subject to confirmation, permanent estimate readings will be inserted without the manual reasonable endeavors eligibility investigation to simplify and/or automate the process.</p>	December 2023	

Historical estimate process		
Non-compliance	Description	
Audit Ref: 12.11 With: Clauses 4 and 5 Schedule 15.3  From: 01-Mar-21 To: 31-May-23	<b>TODD</b> HE Scenarios J & K relating to UML load are not producing expected results as the volumes are being profiled using RPS SASV information. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong as the process used is consistent for all NHH volumes calculated using actual or virtual meter registers and volume differences are small. The audit risk rating is low as the overall volume of ICPs affected is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<b>TODD Response:</b> Non-Compliance accepted. UML submissions are made by inserting calculated meter reads in the billing system against a UML virtual meter assigned to an ICP. These calculated reads were previously being profiled by the RPS profile in the same way as actual meter reads. <ul style="list-style-type: none"> <li>The application of the RPS seasonal profile against UML virtual meter reads has been turned off effective 23/06/2023.</li> </ul> Scenarios where a UML month end virtual meter read was missing from the billing system (such that consumption between the reads spanned multiple months) will now be apportioned as a daily kWh quantity based only on the number of days in a month rather than being apportioned between months by the RPS published seasonal profile.	On-going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<b>TODD:</b> As above	On-going	

<b>Forward estimate process</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 12.12 With: 6 Schedule 15.3</p> <p>From: 01-Jun-21 To: 31-Dec-22</p>	<p><b>TODD</b> Some balancing area differences where the variation between revisions was more than <math>\pm 15\%</math> were caused by forward estimates which were higher or lower than the actual data.</p> <p><b>WISE</b> Some balancing area differences where the variation between revisions was more than <math>\pm 15\%</math> were caused by either data corruption or forward estimates which were higher or lower than the actual data.</p> <p>Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>For TODD controls are strong. 93% of NHH settled meters have communicating AMI metering installed, and the forward estimate methodology will ensure that a reasonable forward estimate is calculated except where the meter has less than two actual readings.</p> <p>For WISE the controls are moderate due no aggregation level check being in place prior to April 2022 to catch any data corruption.</p> <p>For HNET controls are strong as the forward estimate methodology will ensure that a reasonable forward estimate is calculated except where the meter has less than two actual readings.</p> <p>Controls are strong overall. The impact is low because revised submission data will be provided once actual readings are received.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> <li>TODD has historically achieved a strong level of compliance regarding its accuracy of Forward estimates. As shown in the auditor’s commentary above 93% of NHH settled meters have communicating AMI metering installed and there is only 1 balancing area outside of the threshold prescribed.</li> <li>Additionally, at an aggregate level the average percentage change between the initial revision against subsequent revisions was well within the 15% threshold - indicating robustness in Nova’s Forward estimate process.</li> </ul> <p>Actions:</p> <ul style="list-style-type: none"> <li>Since the 2022 EIPC Audit, TODD has used end of month reads for ICPs where AMI data is available. This has resulted in Nova’s initial submissions becoming more accurate as the proportion of Historic estimates increase and Forward estimates decrease.</li> <li>Increased consumption based on starting and ending end of month reads reduces the effect of profiling, further reducing the variance between the initial submission and subsequent revisions. Nova incorporated this change for submission months starting February 2019 onwards.</li> </ul> <p><b>WISE Response:</b></p> <p>Non-Compliance accepted.</p> <p>WISE have reviewed their forward estimation calculation method, resulting in the identification and rectification of an issue to increase accuracy of forward estimates.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>TODD will continue focusing on optimising its standard by identifying and monitoring its performance and opportunities for improvement.</p> <p><b>WISE:</b></p> <p>The monitoring of the revised calculation method will be ongoing to ensure that no issues arise. A comparison will be made with the submissions from the previous month to maintain accuracy.</p>	Ongoing	

<b>Historical estimate reporting to RM</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: Aug-Oct 21 r14, Mar-May 22 r7, Jul-Sep 22 r3</p>	<p><b>TODD</b></p> <p>Historic estimate thresholds were not met for Aug-Oct 21 r14, Mar-May 22 r7, and Jul-Sep 22 r3.</p> <p><b>HNET</b></p> <p>Historic estimate thresholds were not met for R3 for a small number of months and revisions.</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>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>Controls are rated as strong, as they are sufficient to mitigate the risk of not meeting the threshold most of the time. The NSPs where the target wasn't met have a low total number of ICPS.</p> <p>The audit risk rating is low because the overall percentage of HE is high.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>TODD Response:</b></p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> <li>The threshold not met for some NSPs for revisions 3, 7 and 14 had a small number of ICPs connected at the NSPs.</li> <li>Results look good overall. The prevalence of small embedded networks are/will become increasingly overrepresented by the structure of this Code obligation.</li> </ul> <p>Actions:</p> <ul style="list-style-type: none"> <li>We have been actively working on gaining an actual read at the earliest timeframe as possible.</li> <li>Any Forward Estimates at R14 will continue to be checked.</li> </ul> <p>We will review the process of creating permanent estimate readings to ensure that we have historical estimates for all ICPs that have not obtained an 'Actual read' by R14 and are eligible for a permanent estimate.</p> <p><b>HNET Response:</b></p> <p>Non-Compliance accepted.</p> <p>See section 6.9.</p> <p>While HNET endeavours to obtain actual reads for NHH meters, there were significant challenges faced by our external partner in maintaining sufficient workforce to conduct readings over 2022.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><b>TODD:</b></p> <p>TODD will continue focusing on optimising its standard by identifying and monitoring its performance and opportunities for improvement.</p> <p><b>HNET:</b></p> <p>HNET will continue to work with our external partners and contractors to make best effort to gain actual readings. Additionally, there will a focus on migration of legacy meters to smart meters for the remainder of 2023 to minimise the issue.</p>	Ongoing	