

Compliance plan for Plus Energy 2023

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 05-Nov-22</p> <p>To: 30-Jun-23</p>	<p>ICP 1002172552UNFC6 is recorded as metering installation category 3 but with a submission type of NHH.</p> <p>The status for ICP 0468324535LC204 was not updated to active when consumption was detected from reconnection by another trader, but the switch was not completed at that time.</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		
Low	<p>The controls are rated as strong because the exceptions appear isolated:</p> <ul style="list-style-type: none"> The incorrect status was due to another trader not following up and completing a switch for an ICP that they had reconnected prior to requesting then initially withdrawing the switch. The incorrect submission type related to a BTS ICP which was initially expected to be NHH. An additional validation has now been applied to the registry validation suite to capture this exception prior to submission. <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Some of the issues were beyond our control. Those that are within our control have been corrected wherever possible.		28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Further training in the requirements for increased accuracy with regard to manual entry of registry updates has been completed.</p> <p>Training has been received regarding identifying non-notified solar installations.</p> <p>Training in recording CAT3 meters as HH instead of NHH, regardless of the volume through the meter has been received.</p>		28 Aug 2023	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: 10.33A From: 03-May-22 To: 26-May-23	ICP 1002154617UNF22 did not have full certification within five business days of reconnection. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong. Processes are in place to identify where certification is outstanding, and these are actively escalated to the relevant MEPs. The impact on settlement is recorded as minor because the certification was completed prior to the initial submission of volume from this ICP and the certification tests confirmed that the metering was accurate.	
Actions taken to resolve the issue	Completion date	Remedial action status
The correct livening date was entered to the registry. The reason it was late was due to the contractor failing to complete and supply their documentation in a timely manner. We have email evidence of us chasing the MEP for their contractor's paperwork and we even sent our electrician to work with the MEPs contractor to get this resolved. We updated the registry using the correct livening date once the paperwork was received.		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
None. There was nothing more we could have done.		

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: Clause 10.36 From: 01-Apr-23 To: 10-Jun-23	Arrangement was not in place with AMCI MEP for two ICPs. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong and the risk is low. Arrangements are in place for most ICPs. A small number of ICPs were affected for a short period of time.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>While this statement is correct, the ACMI metering agreement prohibits retailers from replacing their meters.</p> <p>The problem with this is that the ACMI meters are legacy and not smart. They do not provide end of day reads and do not communicate remotely regularly.</p> <p>The other problem is that retailers treat these meters differently and place customers with these meters on 144 pricing plans based on the ASX futures prices (which are inflated electricity prices, well above the retail rate given to customers without these meters).</p> <p>Plus Energy provides a service to customers with these meters whereby we swap out these legacy meters to get customers on better pricing (off 144 pricing plans).</p> <p>We did this for these two ICPs and have saved the customers 10's of thousands of dollars in electricity charges.</p> <p>But we can't sign the MEPs agreement as it attempts to lock us out of helping customers.</p>		Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>There is nothing we can do. We cannot sign this MEPs agreement. We only have the ICPs active on these meters for a short period of time as we always replace the meter. However, to replace the meter we must first switch the ICP to us so we can nominate the new MEP and request a meter replacement. It would be useful if we could nominate the MEP prior to being the trader.</p>		

Provision of information on dispute resolution scheme		
Non-compliance	Description	
Audit Ref: 2.19 With: Clause 11.30A From: 30-Dec-20 To: 09-Feb-22	Information on Utilities Disputes is provided in response to inbound calls only where the call relates to a complaint or dispute but should be provided when responding to all customer enquiries. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because information on Utilities Disputes is provided when responding to customer enquiries in most circumstances. The risk is low because Utilities Disputes information is provided where a customer phones regarding a complaint or dispute via a follow up email.	
Actions taken to resolve the issue	Completion date	Remedial action status
We do have an automated telephone answering system. When inbound calls result in a follow up email Utilities Disputes details are always provided as this appears on all email correspondence with our customers and every monthly invoicing email.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
None.		

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 30-Dec-20 To: 18-Aug-21	One late status update relating to ICP 1001262813UNBB0 (51 business days). One late trader update (MEP nomination) relating to ICP 0006560414HB35D (23 business days) 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 rated as moderate because they are adequate to ensure that the registry is updated on time most of the time. The risk is low as most updates were completed on time or soon after they were due and the impact on submission accuracy is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Staffing error. Revision training completed.	28 Aug 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed.	28 Aug 2023	

Provision of information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 01-Mar-22 To: 26-Apr-23	Seven late updates to “active” status for new connections. 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 rated as strong. The late updates were due to either internal delays processing the returned paperwork or late paperwork received from metering service providers. The audit risk rating is low because the greatest late update was 17 days.	
Actions taken to resolve the issue	Completion date	Remedial action status
The correct date was used when updating the registry, no corrections action required.		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed.	28 Aug 2023	

ANZSIC Codes		
Non-compliance	Description	
Audit Ref: 3.6 With: 9 (1)(k) of Schedule 11.1 From: 01-Apr-21 To: 30-Jun-23	ICP 1001292940UN3E0 which is described as streetlights which has the E321200 (Site Preparation Services) ANZSIC code incorrectly applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong and the risk is low because only one exception was identified, and it was corrected during the audit. There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity Authority's reporting accuracy, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The ANZSIC code acquired when we switched this ICP to us was incorrect. We could not locate a more accurate code to reflect the use of this ICP so it was left as it was. With assistance from our Auditor the correct code for Street lighting has been located. To demonstrate how obscure the ANZIC code is for streetlights this is the code that is applicable. <div style="border: 1px solid gray; padding: 2px; margin: 5px 0;">ANZSIC L671100 - Residential Property Operators</div> This is probably why the losing retailer and ourselves had this wrong.	13 Aug 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
None.		

Management of “active” status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 25-Feb-22</p> <p>To: 24-Jul-23</p>	<p>ICP 1001262813UNBBO was initially recorded as active from 26/02/22 but was reconnected from the switch date of 25/02/22. This was corrected by Plus Energy during the audit period.</p> <p>The reconnection event dates for two ICPs were incorrectly applied due to losing trader providing an alternative event date that did not align with the reconnection event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate because while the exceptions appear isolated and where the losing trader amended the proposed event date for NTMI switches for inactive ICPs there was no attempt to correct the proposed transfer date with the losing trader.</p> <p>The audit risk rating is low because there was a small number of days difference in each case.</p>	
Actions taken to resolve the issue		Completion date
<p>ICP 1001262813UNBBO corrected.</p> <p>No action required on the two ICPs we could not enter the correct dates for.</p>		
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Revision training received on how best to deal with Retailers that don't accept submitted switch dates, has been received.</p> <p>We should have withdrawn the initial switch request, resubmitted the SM switch and advised the losing trader of the need to have the proposed transfer date accepted as this is the reconnection date.</p>		28 Aug 2023
Identified		

Management of “inactive” status		
Non-compliance	Description	
Audit Ref: 3.9 With: 19 Schedule 11.1 From: 05-Nov-22 To: 15-Jan-23	ICP 0468324535LC204 with inactive consumption did not have the status updated to “active” for the periods with consumption while the ICP was with Plus Energy. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are assessed to be strong as Plus Energy have processes to monitor inactive consumption. The impact was assessed to be low as the inactive consumption was included in the submission process however the registry status did not reflect the correct connection status until the switch was eventually completed.	
Actions taken to resolve the issue	Completion date	Remedial action status
The meter was reconnected by another Retailer not by us hence we did not update the registry, however I now understand that due to us submitting volume during the period the other retailer reconnected supply we should have updated the registry accordingly.	28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training received	28 Aug 2023	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 11-Apr-22 To: 11-Apr-22	One transfer switch CS files contained incorrect average daily kWh (1 kWh) relating to ICP 0006835228RN75F where the correct value was 4 kWh. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong overall as the method to calculate average daily kWh has been updated since the last audit to match the Registry functional specification and the non-compliances occurred because of human error. The impact is low because the affected meters have AMI capability, and it is unlikely that the average daily kWh would be needed to create forward estimate.	
Actions taken to resolve the issue	Completion date	Remedial action status
None.	28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed	28 Aug 2023	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 03-Aug-22 To: 26-Aug-22	One late NT file. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as NTs are consistently sent within two business days of preconditions being met. Plus Energy were the customer for this one late NT file which related to this ICP being converted to a gate meter for a new embedded network. The audit risk rating is assessed to be low because there is minimal impact on other parties and reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
None	28 Aug 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed	28 Aug 2023	

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.1 From: 29-May-22 To: 08-Sep-22	One AN applied the incorrect response code. Two E2 breaches. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as Strong as the processes to ensure AN and CS files are sent are robust and the issues identified relate to human error. The impact was low due to only three affected CS files being identified.	
Actions taken to resolve the issue	Completion date	Remedial action status
For 0000405804MP1D4 and 0239743652LCEDA no action. The occupiers cancelled their agreement for supply with us, and instead entered into an agreement with another Retailer hence the switch out dates used were the known dates of reconnection.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training received. Instead of accepting the switch out with the reconnection date we should have communicate to the proposed gaining trader and the previous losing trader advising that the customer has cancelled their agreement with Plus so in order to remove Plus Energy from the ICP timeline that a double switch withdraw is required and the gaining trader can then re request the switch directly from the initial losing trader thereby removing Plus Energy's timeline from this ICP.	28 Aug 2023	

Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10 With: Clause 11 Schedule 11.3</p> <p>From: 09-Feb-22 To: 12-Dec-22</p>	<p>CS file for ICP 1002153920LC46B the switch event read was recorded as 75 (E) which did not reflect the read used in submission 0 (A). The switch event date is now outside the revision window therefore this volume difference of 75 kWh is missing from submission.</p> <p>CS file for ICP 0000009466NTEB0 contained an incorrect read type - A instead of E.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong overall as the incorrect last actual read dates and readings appear to be manual data processing errors.</p> <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
None due to the low impact.	28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed.	28 Aug 2023	

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 25-Nov-22 To: 07-Jan-23	Three incorrect NW codes applied from a sample of eight ICPs reviewed. Two SR breaches relating to ICP 0468324535LC204. One NA breach 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 rated as moderate. The NW response codes are manually applied resulting in some occurrences where the response code was incorrectly applied. The impact is assessed to be low because a small proportion of NWs were issued late, or with incorrect codes.	
Actions taken to resolve the issue	Completion date	Remedial action status
None required.	28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
For ICP 0468324535LC204 we were acting to protect the integrity of our industry as the customer was attempting to defraud our industry by using electricity without paying for it. Our actions resulting in the electricity consumed being account for and reconciled and that matter was eventually resolved amicably and satisfactorily, and our industry was protected. Accepting the SR's as proposed would have allowed fraud to have been committed against our industry. Revision training has been completed including use of the code DF when rejecting switch request with incorrect move in dates supplied by the gaining retailer.	28 Aug 2023	

Metering information		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 09-Feb-22 To: 12-Dec-22	One switch move CS file did not contain the actual reading or best estimate of consumption on Plus Energy's last day of supply: <ul style="list-style-type: none"> •1002153920LC46B (09/02/2022) 75 (E) instead of 0 (A) difference of -75 kWh 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 rated as moderate. The incorrect reading appears to be manual data processing errors. The impact is assessed to be low because the incorrect information may have a minor impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
None due to the low impact.	28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed.	28 Aug 2023	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13, Clause 10.24 and 15.13 From: 01-Apr-23 To: 31-May-23	ICP 1002041538LCF13 has distributed generation present but does not have settled I flow register installed and there is no record added to the gifting register. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong. There is monitoring in place for new DG installations however monitoring missed this switched ICP with DG. The impact is assessed to be low because the likelihood of any export volumes being recorded for this metering installation category 2 ICP is very low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Will add to the gifting register.	20 Sept 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training in how to identify solar is installed when the settlement metering data in the registry shows no "I" and no meter register of "EG".	28 Aug 2023	

Derivation of meter readings		
Non-compliance	Description	
Audit Ref: 6.6 With: Clause 3(1), 3(2) and 5 Schedule 15.2 From: 09-Feb-22 To: 31-May-23	Customer provided reads for two ICPs recorded as validated actual reads however these were not validated using a set of reads not provided by the customer. 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 rated as moderate. The customer provided reads were supported by photos which confirm the accuracy of these reads however there is no mechanism to validate these reads against reads from other non customer sources. The impact is assessed to be low because the read accuracy was confirmed by way of a photo.	
Actions taken to resolve the issue	Completion date	Remedial action status
One of these customers lives in a remote area with a very high crime rate (burglaries etc). See google maps location for their address 977 Russell Road Hikurangi. The customer's meter is behind a locked gate and the customer will not provide a key to the gate to contractors and third parties. The customer provides us with regular reads by way of photos. I suggest this is exceptional circumstances given the remoteness and the areas very high crime rate. We propose we arrange for the customer to have a visitor/trained meter reader to their property take a photo and have this visitor email us this so that we have another party verify the photo evidence we are receiving from the customer.	20 Sept 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
If possible, we will try and arrange for the customer to co-ordinate with our WELLS manual reader provider a date and time when a trained meter reader can visit the premises while the owner/occupier is present.	20 Sept 2023	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 09-Feb-22 To: 12-Dec-22	One switch move CS file did not contain the actual reading or best estimate of consumption on Plus Energy's last day of supply: <ul style="list-style-type: none"> • 1002153920LC46B (09/02/2022) 75 (E) instead of 0 (A) difference of -75 kWh Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. The incorrect reading appears to be manual data processing errors. The impact is assessed to be low because the incorrect information may have a minor impact on settlement.	
Actions taken to resolve the issue		Completion date
None due to low impact.		28 Aug 2023
Preventative actions taken to ensure no further issues will occur		Completion date
Revision training completed		28 Aug 2023
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 09-Feb-22 To: 12-Dec-22</p>	<p>Customer provided reads for ICP 0000569837NR946 recorded as validated actual reads however these were not validated using a set of reads not provided by the customer. Exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. The customer provided reads were supported by photos which confirm the accuracy of these reads however there is no mechanism to validate these reads against reads from other non customer sources.</p> <p>The impact is assessed to be low because the read accuracy was confirmed by way of a photo.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Repeat of 6.6. Above</p> <p>One of these customers lives in a remote area with a very high crime rate (burglaries etc). See google maps location for their address 977 Russell Road Hikurangi.</p> <p>The customer's meter is behind a locked gate and the customer will not provide a key to the gate to contractors and third parties.</p> <p>The customer provides us with regular reads by way of photos.</p> <p>I suggest this is exceptional circumstances given the remoteness and the areas very high crime rate.</p> <p>We propose we arrange for the customer to have a visitor/trained meter reader to their property take a photo and have this visitor email us this so that we have another party verify the photo evidence we are receiving from the customer.</p>	20 Sept 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>If possible, we will try and arrange for the customer to co-ordinate with our WELLS manual reader provider a date and time when a trained meter reader can visit the premises while the owner/occupier is present.</p>	20 Sept 2023	

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2</p> <p>From: 09-Feb-22 To: 12-Dec-22</p>	<p>Incorrect switch event read and read type were recorded in the CS file for ICP 1002153920LC46B.</p> <p>Incorrect switch event read type was recorded in the CS file for ICP 0000009466NTEB0.</p> <p>Customer reads for two ICPs that have not been validated using another set of reads not provided by the customer incorrectly labelled as actual reads.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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.</p> <ul style="list-style-type: none"> The incorrect switch readings / read types appear to be a manual data processing error. The customer provided reads were supported by photos which confirm the accuracy of these reads however there is no mechanism to validate these reads against reads from other non customer sources. <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement.</p>	
Actions taken to resolve the issue		Completion date
<p>Re 0000009466NTEB0 This ICP was never active while with us and we never received any manual or non-validated reads for this ICP. We supplied the switch in reads from the previous retailer when the ICP switched away. No action required.</p> <p>No action on 1002153920LC46B due to low impact on settlement.</p>		28 Aug 2023
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Revision training completed regarding incorrect the incorrect switch event read for ICP 1002153920LC46B</p>		28 Aug 2023
		Identified

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.3 With: Clause 9 (1(k) of Schedule 11.1 From: 10-Jan-23 To: 31-Mar-23	Revised electricity supplied volumes not submitted related to 87 backdated switched ICPs for January, February and March 2023. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because while the process effectively calculates billed volumes for all invoiced ICPs, the process does not consistently handle invoiced volumes where the ICP transitions to another trader under a tier 2 arrangement where Plus Energy purchases energy from another trader to supply a portion of its customer base. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The back dating to this extent was unusual and is not expected to occur again.	28 Aug 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Not expected to occur again.	28 Aug 2023	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 26-Apr-23 To: 30-Jun-23</p>	<p>ICP 1002041538LCF13 has distributed generation present but does not have settled I flow register installed and there is no record added to the gifting register.</p> <p>ICP 1002172552UNFC6 is recorded as metering installation category 3 but was submitted as NHH.</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	
Low	<p>The controls are rated as strong because the exceptions appear isolated:</p> <ul style="list-style-type: none"> The distributed generation ICP without an EG register being present is a Cat 2 metering installation with a small solar installation so is unlikely to export. The incorrect submission type related to a BTS ICP which was initially expected to be NHH. An additional validation has now been applied to the registry validation suite to capture this exception prior to submission. <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
1002041538LCF13 is a gate meter for an embedded network and although has a chargeable capacity of 1,500 kVA, there was minimal volume flowing through the meter from livening date (26 April 2023 to the date settlement was changed to HHR – 23 May 2023) as the site was still under construction and occupiers had not yet moved into the properties.	23 May 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
In future we will use HHR for all CAT 3 meters regardless of volume.	28 Aug 2023	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 29-Jun-20 To: 29-Jun-21	CS file for ICP 1002153920LC46B the switch event read was recorded as 75 (E) which did not reflect the read used in submission 0 (A). The switch event date is now outside the revision window therefore this volume difference of 75 kWh is missing from submission. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong because there is a process to monitor switch reads in the reconciliation process to ensure alignment. The issue was caused by inaccurate readings being applied for a single CS file. The impact is assessed to be low because the incorrect information may have a minor impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
None, as the impact on settlement is low		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Revision training completed.		