

## Compliance plan for Switch Utilities

Audit Trails		
Non-compliance	Description	
<b>Audit Ref: 2.4</b>  <b>With:</b> Clause 21 of schedule 15.2  <b>From/to:</b> 19/07/16 to 18/07/17	Audit trail not complete for HHR changes. <b>Potential impact:</b> Medium <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The impact on settlement is potentially minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
<p>The majority of systems related to our reconciliation participation have been rebuilt after the purchase of Switch Utilities by the Vocus Group. The half-hour reconciliation system is the one major remaining system affecting certification which has not yet been rebuilt.</p> <p>A project is underway, currently at the scoping stage, to rebuild the half-hourly reconciliation system and to integrate it within the shared services back-end energy database and related systems. As a part of this project, improved audit trail functionality will be included.</p> <p>We will organise a material change audit at the time of release to confirm that the system fully complies with all audit trail and other regulatory obligations.</p>	Targeted for end of 2017.	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Changes to Registry Information	
Non-compliance	Description
<b>Audit Ref: 3.3</b>  <b>With:</b> Clause 10 of schedule 11.1  <b>From/to:</b> 07/04/17 to 24/05/17	Registry information not provided within 5 business days of change. <b>Potential impact:</b> Medium <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>
Audit Risk Rating	Rationale for audit risk rating

Low	<p>Status changes can have a minor impact on settlement outcomes if consumption information is provided based on the registry status and then needs to be corrected.</p> <p>Market participants can be affected if a switch out occurs for an ICP with the incorrect status.</p> <p>Customers can be affected if invoicing is based on the incorrect ICP status.</p>		
Actions taken to resolve the issue		Completion date	Remedial action Status
The non-compliance was caused by an inadequate understanding of the processes, additional processes and documentation has been developed.		Cleared	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are separately in the process of building compliance monitoring reporting which will identify non-conformances and potential non-conformances so that action can be taken to resolve.		01/08/2017	

Provision of Information to the Registry			
Non-compliance	Description		
<p><b>Audit Ref: 3.5</b></p> <p><b>With:</b> Clause 9 of schedule 11.1</p> <p><b>From/to:</b> 12/01/17 to 30/05/17</p>	<p>Some late changes to Active.</p> <p>Some late MEP notifications.</p> <p><b>Potential impact:</b> Low</p> <p><b>Actual impact:</b> Low</p> <p><b>Audit history:</b> None</p> <p><b>Controls:</b> Moderate</p> <p><b>Breach Risk Rating: 2</b></p>		
Audit Risk Rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate because there are some improvements that can be made to them to ensure the timeliness of updates once is improved.</p> <p>The audit risk rating is low, because the impact on submission information is low. Late changes to Active can mean submission information is not provided at the earliest opportunity. Billing will also be delayed for some ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action Status
The non-compliance was caused by an inadequate understanding of the processes, additional processes and documentation has been developed.		Cleared	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are separately in the process of building compliance monitoring reporting which will identify non-conformances and potential non-conformances so that action can be taken to resolve.		01/08/2017	

ANZSIC Codes		
Non-compliance	Description	
<b>Audit Ref: 3.6</b>  <b>With:</b> Clause 9(1)(k) of schedule 11.1  <b>From/to:</b> Entire audit period	3 of 20 incorrect ANZSIC codes. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	There is an improvement opportunity for the controls in place to ensure codes are correct. There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity's reporting accuracy, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We have identified that a user loading the ANZSIC codes required additional training and we have provided further guidance to that user.		Cleared
Preventative actions taken to ensure no further issues will occur		Completion date
An item has been added to the development plan for the Switchsaver application used by the Vocus Group for business related signups to collect the ANZSIC code from the salesperson at point of sale, who has a better understanding of the usage, rather than relying on the switching agent to determine the ANZSIC code.  Compliance monitoring will be added to flag sites on a T9XXX code so that these can be double-checked by a second person to ensure no code can be determined.		01/12/2017
		Identified

Management of "Active" Status		
Non-compliance	Description	
<b>Audit Ref: 3.8</b>  <b>With:</b> Clause 17 of schedule 11.1  <b>From/to:</b> 02/06/17 to 18/07/17	One incorrect Active status. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are rated as strong because this was an unusual circumstance and was a one-off issue. The audit risk rating is low, because there is no impact on settlement.	
Actions taken to resolve the issue		Completion date
Remedial action Status		

As noted, this was an unusual exception caused by human error and a misunderstanding of the paperwork. No further action has been identified which could reduce the risk of error further for this scenario.	Cleared	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

Losing Trader Response to Switch Request		
Non-compliance	Description	
<b>Audit Ref: 4.2</b>  <b>With:</b> Clause 3 of schedule 11.3  <b>From/to:</b> 27/02/17 to 22/05/17	AN codes of AA used for 4 of 6 files where AD should have been used. 3 of these were TR switches. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because there is room for improvement There is no impact on settlement or on other participants because the AD code is not used for decision making. The presence of advanced metering is determined by checking the registry. The audit risk rating is therefore low.	
Actions taken to resolve the issue		Completion date
We have identified that a switching agent had an inadequate understanding of the usage of the AN response codes, although the processes clearly set out the use cases. Additional training has been provided to that agent.		Cleared
Preventative actions taken to ensure no further issues will occur		Completion date
We have a project underway to automate the creation of the switch loss acknowledgements which will determine the AN response codes systematically based on the ICP configuration and state, which will reduce the likelihood of such human error.		01/10/2017

Losing Trader Must Provide Final Information		
Non-compliance	Description	
<b>Audit Ref: 4.3</b>  <b>With:</b> Clause 5 of schedule 11.3  <b>From/to:</b> 22/03/17 to 10/04/17	14 late CS files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	

Low	The controls are strong and 10 files were only late by one day, therefore the impact on settlement outcomes is minor.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>
<p>The switch breaches occurred due to the switching agent previously having a misunderstanding in relation to the event date vs CS creation date timing. The switching agent was always providing the gaining retailer the ICP as at their proposed event date for transfer switches in much the same way as a move switch, but in some cases the switching was delayed due to the significant system changes that were occurring earlier in 2017.</p> <p>This process issue was identified earlier in 2017, prior to the audit, and further training was provided at this time. Since that time, compliance has been achieved.</p> <p>This issue was exacerbated by the fact the Electricity Breach report provides easily misunderstood compliance timers which is a known industry issue.</p>		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>This process issue was identified earlier in 2017, prior to the audit, and further training was provided at this time. Since that time, compliance has been achieved.</p> <p>A project is underway to automate the switch-losses systematically so that the risk of human error is removed.</p>	01/10/2017	

<b>Retailers Must Use Same Reading</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p><b>Audit Ref: 4.4</b></p> <p><b>With:</b> Clause 6 of schedule 11.3</p> <p><b>From/to:</b> 03/04/07 to 24/04/17</p>	<p>2 late RR files.</p> <p><b>Potential impact:</b> Low</p> <p><b>Actual impact:</b> Low</p> <p><b>Audit history:</b> None</p> <p><b>Controls:</b> Strong</p> <p><b>Breach Risk Rating: 1</b></p>	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are strong and the main issue leading to late files is lack of meter readings, which is a different process. The impact on settlement is minor because the number of ICPs is low, therefore the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>

In the circumstance, Switch believes that it was in the best interests of the customer and all participants involved to replace the read late in order to better comply with its obligations to ensure that complete and accurate information is provided which impacts the reconciliation process.	Cleared	Identified
Switch does not believe any further action can be taken here given that circumstances.		
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

Losing Trader Provides Information		
Non-compliance	Description	
<b>Audit Ref: 4.8</b>  <b>With:</b> Clause 10 of schedule 11.3  <b>From/to:</b> 27/02/17 to 22/05/17	AN codes of AA used for 4 of 6 files where AD should have been used. One of these was a MI switch. 1 late AN. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because there is room for improvement. There is no impact on settlement or on other participants because the AD code is not used for decision making. The presence of advanced metering is determined by checking the registry. The audit risk rating is therefore low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have identified that a switching agent had an inadequate understanding of the usage of the AN response codes, although the processes clearly set out the use cases. Additional training has been provided to that agent.	Cleared	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We have a project underway to automate the creation of the switch loss acknowledgements which will determine the AN response codes systematically based on the ICP configuration and state, which will reduce the likelihood of such human error.	01/10/2017	

Losing Trader Must Provide Final Information		
Non-compliance	Description	
<b>Audit Ref: 4.10</b>  <b>With:</b> Clause 11 of schedule 11.3  <b>From/to:</b> 08/12/16 to 03/05/17	11 late CS files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because there is room for improvement. There is no impact on settlement and only a minor impact on other participants because the files were between 1 and 4 days late.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The late move switch related CS files all occurred during the significant transition of Switch systems after the purchase by Vocus in late 2016 through to the completion of the system transitions in approximately April.  Compliance has already been improved since this date due to various improvements to processes, additional training and resourcing, and the completion of the system transition.	Cleared	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Compliance has already been improved since this date due to various improvements to processes, additional training and resourcing, and the completion of the system transition.  As noted in earlier sections, the development of additional compliance monitoring is underway and this will allow any further non-compliances to be identified sooner and the underlying causes resolved where appropriate.	01/08/2017	

Gaining Trader to Notify Registry		
Non-compliance	Description	
<b>Audit Ref: 4.14</b>  <b>With:</b> Clause 16 of schedule 11.3  <b>From/to:</b> 03/02/17 to 16/03/17	5 late CS files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because there is room for improvement. There is no impact on settlement and only a minor impact on other participants because Switch sends a CS for their own ICP in the HH process.	
Actions taken to resolve the issue	Completion date	Remedial action Status
In this case the late CS files was caused by the fact that we did not realise that, after the other retailer has sent their "AN", the ICP disappears entirely from the breach report.  As a result, we were not aware that the ICPs were ready for CS Files until the other retailer notified us that the ICPs were pending a CS.  We have improved our process for CS switching so that we no longer rely on the breach report for monitoring HH related switches.	Cleared	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have improved our process for CS switching so that we no longer rely on the breach report for monitoring HH related switches.	Cleared	

Withdrawal of Switch Requests		
Non-compliance	Description	
<b>Audit Ref: 4.15</b>  <b>With:</b> Clause 17 of schedule 11.3  <b>From/to:</b> 01/04/17 to 23/05/17	3 late NW files. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are strong for the management of withdrawals. Whilst 3 files were late the issues only become clear after billing had occurred and then an investigation was completed. There was a minor impact on settlement due to the correction of consumption information. There was also a minor impact on the customer; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status



In the circumstance, Switch believes that it was in the best interests of the customer and all participants involved to replace the read late in order to better comply with its obligations to ensure that complete and accurate information is provided which impacts the reconciliation process.	Cleared	Identified
Switch does not believe any further action can be taken here given that circumstances.		
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

Interrogate Meters Once		
Non-compliance	Description	
<b>Audit Ref: 6.8</b>  <b>With:</b> Clauses 7(1) and 7(2) of Schedule 15.2  <b>From/to:</b> 19/07/16 to 18/07/17	No process for getting meter readings during the period of supply. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Weak <b>Breach Risk Rating: 3</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The impact on settlement from an estimate for a short period is minor therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Although we acknowledge that there may be some circumstances where a reading is not obtained during the period of supply, given that our standard no-reading process begins at 60 days, we have not been able to identify any other processes that reasonably could be implemented to improve read attainment here given the short timeframes involved, and there is no likely material market impact.  Switch is open to suggestions from the EA or other parties on processes we could implement, which are being used by other participants in the industry, which would improve our compliance here and we are happy to correspond further on these matters.	Cleared	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

Electronic Meter Readings and Estimated Readings		
Non-compliance	Description	
<b>Audit Ref: 9.6</b>  <b>With:</b> Clause 17 of schedule 15.2  <b>From/to:</b> 19/07/16 to 18/07/17	AMI event information not routinely monitored. No event information from ARC.  <b>Potential impact:</b> High <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are considered moderate because there is room for improvement. No examples were found where settlement was affected and the major issues are dealt with, so the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We are notified of material events by AMS who is our predominant provider of read information.  We accept that there was an oversight in relation to the monitoring of AMI event information more generally, and have implemented a process to monitor event information provided by the other metering equipment providers.  We have also followed up with ARC with respect to the current non-provision of event information to Switch.	Cleared	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Calculation of ICP Days		
Non-compliance	Description	
<b>Audit Ref: 11.2</b>  <b>With:</b> Clause 15.6 of part 15  <b>From/to:</b> 01/12/16 to 31/05/17	ICP days calculation inaccurate where reads are not present.  <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 2</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls are considered moderate because there is room for improvement to identify and correct discrepancies more quickly. The impact on settlement is minor, therefore the audit risk rating is considered low.	
Actions taken to resolve the issue	Completion date	Remedial action Status

<p>We have identified that this is caused by a specific situation in our non-half hourly reconciliation system where no read information (estimated from the billing engine, or actual) is available and the system reverts to Default Estimation.</p> <p>The sub-routine for Default Estimation is defective and does not add the additional one day necessary for the first date of responsibility, but the day calculation is otherwise correct once at least one reading (or non-default estimation from the billing engine) is available and the read-to-read calculation routine is applied.</p> <p>As such this is self resolving through revision, and the interim solution is that for all ICPs being reconciled Switch will ensure a reading is provided to the NHH Reconciliation System (whether actual reading, or an estimate sourced from the billing platform, or an estimate reading manually entered in by the end user) which will prevent default estimation during the first month or so after acquisition.</p>	01/08/2017	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

Electricity Supplied Information Provision to the Reconciliation Manager		
Non-compliance	Description	
<b>Audit Ref: 11.3</b>  <b>With:</b> Clause 15.7 of part 15  <b>From/to:</b> 01/09/16 to 31/05/17	Electricity supplied data incorrect. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are strong and these issues were both identified by Switch Utilities through conducting a comparison between billed and submission totals.  There is no effect on settlement because this information is used as an indicator, therefore the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action Status</b>

<p>As noted by the Auditor, we identified this problem early in our operation as being caused predominantly by customer networks where we receive costs at the customer network gate, but perform no billing at the gate ICP.</p> <p>We modified our system earlier in the year to collect down-stream customer billing from the non-market reconciled connections and aggregate it up to the gate for provision in the submission files, and have observed that this corrects the discrepancy through revision.</p> <p>There is also a minor discrepancy during the period of transition from Type 1 to Type 2 which is caused by the fact that part of the month relates to when we owned the ICP as a retail participant, and part of the month relates to when we owned the ICP indirectly through a third party retailer. This only impacts the months from approximately August 2016 to January 2017 as we completed the transition, and cannot reasonably be corrected because the billing data cannot be reasonably separated between the two ownerships as the billing overlaps both ownerships (we did genuinely bill the amounts submitted, it just happens that some of that billing volume was reconciled elsewhere).</p> <p>We believe that as this does not impact any moving-forward submissions that this has effectively been cleared and are otherwise able to demonstrate accuracy of our submissions during this period to the Auditor.</p>	Cleared	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	

HHR Aggregates Information Provision to the Reconciliation Manager		
Non-compliance	Description	
<p><b>Audit Ref:</b> 11.4</p> <p><b>With:</b> Clause 15.8 of part 15</p> <p><b>From/to:</b> 01/01/17 to 28/02/17</p>	<p>Aggregates file contains submission information.</p> <p>Incorrect totals for some ICPs due to a duplication of channels issue.</p> <p>One ICP had generation submitted as load and the load was not submitted.</p> <p><b>Potential impact:</b> Medium</p> <p><b>Actual impact:</b> Low</p> <p><b>Audit history:</b> None</p> <p><b>Controls:</b> Moderate</p> <p><b>Breach Risk Rating: 2</b></p>	
Audit Risk Rating	Rationale for audit risk rating	
Low	<p>Controls are in place but they did not identify all of the issues present, so the rating is moderate.</p> <p>The aggregates file is used for reporting not for settlement so the impact is considered minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action Status

<p>We have already lodged a Code Change proposal with the authority in relation to the incorrect drafting of retailers financial records vs. submission information. The Reconciliation Manager confirmed that they do require submission information for their purposes and the provision of any other data would cause issues for the reconciliation process.</p> <p>As noted above, the issue with submissions in Day 4 was identified through our validation processes and corrected prior to the audit.</p> <p>We have built a correction to our process in relation to one ICP which had both import and export flow – the underlying problem here was that the Metering Equipment Provider’s registry configuration records only a single 7304 channel, and so the reconciliation process expects only a single stream of data, but in practice the Metering Equipment Provider provided two streams of data in separate files against a single channel and the system presumes that this is intended as a “correction” of the previous stream and overwrote the first import.</p> <p>This is a particularly unusual (and potentially incorrect) metering configuration but the process has been updated to look at the flow direction flag in addition to the meter serial number and ICP identified when determining whether to treat data as overwritten vs. an additional stream.</p>	Cleared	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p>The above issue was made also impacted by the fact this was an issue from the first submission so the month-to-month comparison validation did not identify the discrepancy. We now also compare our volumes against our Salesforce Annual Expected kWh which is seasonalised down to a monthly number so that we can see whether a submission is within the ballpark of what is expected as the submission value for a given month based on information collected at the point of sale.</p>	Cleared	

Daylight Saving Adjustment	
Non-compliance	Description
<p><b>Audit Ref:</b> 12.1</p> <p><b>With:</b> Clause 15.36 of part 15</p> <p><b>From/to:</b> April 2017</p>	<p>Incorrect daylight saving adjustment.</p> <p><b>Potential impact:</b> Low</p> <p><b>Actual impact:</b> Low</p> <p><b>Audit history:</b> None</p> <p><b>Controls:</b> Moderate</p> <p><b>Breach Risk Rating:</b> 2</p>
Audit Risk Rating	Rationale for audit risk rating

Low	The controls identified this matter but not in time to make the corrections on day 13, so the controls are rated as moderate. Settlement is affected by 0.1% which is considered 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>
<p>In relation to the Metrix data, we had incorrectly understood from our communications with Metrix that the data they provided for smart meter LP sites was daylight savings adjusted when it ultimately was not and this was only identified at the point of daylight savings change. As our systems were not configured to daylight savings adjust volumes there was no immediate resolution and further manual correction had to be made.</p> <p>Upon identifying the issue, we directed Metrix to install true-time of use metering, and the submission information is now provided by EDM I as certified and daylight-savings adjusted EIEP3 data. We have manually corrected the historic submission information for the period prior to the meter change to correct that historic submission information, but there is no expected to be any material value to the shift of volume by two time periods.</p> <p>With respect to the 47/48 TP error, unfortunately this was not identified at the time due to the fact this was the first time we had performed daylight savings adjustment in that system and the validations were not adequate. However, we did identify the issue through post-submission additional analysis and immediately corrected this at the first Day 13 revision so no further issues should occur.</p>	Cleared	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above, we have installed alternative metering to resolve the Metrix issue on 4 ICPs and we corrected the code error causing the issue on the 47/48 TP periods immediately.	Cleared	

<b>Creation of Submission Information</b>	
<b>Non-compliance</b>	<b>Description</b>
<b>Audit Ref: 12.9</b>  <b>With:</b> Clause 2 of schedule 15.3  <b>From/to:</b> 01/01/17 to 30/04/17	Incorrect submission information. <b>Potential impact:</b> Medium <b>Actual impact:</b> Medium <b>Audit history:</b> None <b>Controls:</b> Moderate <b>Breach Risk Rating: 4</b>
<b>Audit Risk Rating</b>	<b>Rationale for audit risk rating</b>
Medium	Controls are in place and they identified the channel duplication issue, but not the issue of generation not being submitted.  There was a moderate effect on settlement, therefore the audit risk rating is medium.

Actions taken to resolve the issue	Completion date	Remedial action Status
Item 1: Refer to comments in Section 11.4 Item 2: Refer to comments in Section 11.4 Item 3: Refer to comments in Section 12.1 Item 4: Refer to comments in	See relevant sections	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Market Administrator Meter Reading Reports		
Non-compliance	Description	
<b>Audit Ref: 13.1</b>  <b>With:</b> Clauses 8 and 9 of Schedule 15.2  <b>From/to:</b> 01/11/16 to 31/12/16	Meter reading frequency reports were not submitted prior to June 2017. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	
Low	Little impact on other participants. Good controls are now in place to ensure that reports are submitted on time.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We were unable to submit the reports as an unexpected result of the transition of systems, but this has now been resolved and reports are now being submitted.	Cleared	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Historical Estimate Reporting to RM		
Non-compliance	Description	
<b>Audit Ref: 13.4</b>  <b>With:</b> Clause 10 of Schedule 15.3  <b>From/to:</b> 01/10/16 to 30/11/16	Historic estimate targets were not met for all revisions. <b>Potential impact:</b> Low <b>Actual impact:</b> Low <b>Audit history:</b> None <b>Controls:</b> Strong <b>Breach Risk Rating: 1</b>	
Audit Risk Rating	Rationale for audit risk rating	

Low	Strong controls are in place. There is a schedule listing all ICPs where issues exist, including meter reading access and comms issues. The impact on settlement is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue	Completion date	Remedial action Status	
<p>We are continuing to work through sites without access for readings with customers, through a letter and calling process.</p> <p>Where readings are not obtained by Month 14 Permanent Estimates will be applied.</p>	To be confirmed in further correspondence with EA	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		