

Compliance plan for Opunake Hydro Ltd

Title: Provision of Complete and Accurate Information in relation to Parts 10 & 15 of the Electricity Code		
Non-compliance	Description	
Audit Ref: 1.9 With: Clause 15.2 of part 15 From/to: Entire audit period	Inaccurate information used for submission. Potential impact: Low Actual impact: None Audit history: Three times previously Controls: Weak Breach risk rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	A billing system issue resulted in over reporting of billed consumption for reports created from August to October 2016. This issue caused high as billed reporting in January, February, May and June 2016. Simply Energy confirmed that the issue has now been corrected, and the high billed consumption will wash out with future revisions. As billed information is not used for market settlement.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Our Billing system over reported Electricity Supplied volumes from the start of August 2016 through to November when the issue was resolved. This has contributed to some of the mis-match in this reporting. The affected months are January and February 2016 and May and June 2016. We are investigating any other discrepancies as we had resolved the issues previously reported in past years.	31 January 2016	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Losing Trader Response to Switch Request		
Non-compliance	Description	
Audit Ref: 2.1.2 With: Clause 3 of Schedule 11.3 From/to: August 2016	An incorrect AN response code was provided for 0007117408RNF25. AD (advanced metering) applied, but AA (accept and acknowledge) was used. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	There was only one error. Other participants could confirm AMI metering was in place for the affected ICPs through other registry fields.	

Actions taken to resolve the issue	Completion date	Remedial action Status
Process documentation has been updated so that all staff are aware of this change. The one instance in this audit was done 6 days after the new code came into force.	31 August 2016	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Traders Must Use Same Reading		
Non-compliance	Description	
Audit Ref: 2.1.5 With: Clause 6 of schedule 11.3 From/to: April 2016	Two late RR files, both for ICP 0000183037TPFB4. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	One ICP was affected, and the delay was due to difficulty in obtaining actual readings. The second read renegotiation request was accepted by the other retailer.	
Actions taken to resolve the issue	Completion date	Remedial action Status
This ICP is a High School, it switched to OPHL in November 2015. The first two read attempts found the school closed so the first successful read was February 2016. To dispute the switch a second actual read was required however when Delta visited the site in March it was Easter and again the School was closed. In April the second read was obtained and then we disputed the switch read.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
In general missed reads are managed more frequently and through replacing legacy meters to Advanced Meters the 4 month time should not be breached in future.		

Title: Gaining Trader Changes to Switch Meter Reading		
Non-compliance	Description	
Audit Ref: 2.2.3 With: Clause 12 of schedule 11.3 From/to: March 2016	One late RR file, for ICP 0000194073UN253. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	

Audit Risk Rating	Rationale for audit risk rating		
Low	A backdated switch was the primary cause of the delay. The read renegotiation request was accepted by the other retailer.		
Actions taken to resolve the issue		Completion date	Remedial action Status
The switch on this ICP was in fact backdated to November 2015. Once the ICP switched in February we built some read history up and then had to use this to back estimate.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A report is used to view recent switched ICPs with estimates on Advanced Meters, this was adapted to detect these issues but ICP 0000194073UN253 with a long backdate was we believe an exception.			

Title: Gaining Trader Informs Registry of Event Date			
Non-compliance	Description		
Audit Ref: 2.3.3 With: Clause 16 of Schedule 11.3 From/to May-August 2016	Three late CS files for half hour switches, for ICPs 0007757907NV783, 0000174636TRC1A, and 0006949428RN40C. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit Risk Rating	Rationale for audit risk rating		
Low	Three files were late. One was delayed due to multiple withdrawals being completed. The others were delayed by nine days or less.		
Actions taken to resolve the issue		Completion date	Remedial action Status
We do have a Dashboard that detects when HHR ICPs are ready to claim which is monitored regularly. The other report we rely on is the Registry Switch Breach report but for some reason these don't report here once the AN file is sent.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Title: Changes to Registry Information		
Non-compliance	Description	
Audit Ref: 2.9.2 With: Clause 10 of schedule 11.1 From/to: January to October 2016	21 late ICP status changes, and 121 late trader information changes. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Weak Breach risk rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	Most updates were processed on time. Over half of the late trader updates were only one day late. Most of the delays to status updates were minor.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Simply Energy on behalf of Opunake Hydro is working with Test Houses to provide confirmation on meter installations quicker. This was noted in the Simply Energy audit and when meeting with the EA. This is for the 21 late ICP Status changes. The late trader information changes are a combination of Proposed MEP and ANZSIC changes. The latter we used the switch date as effective date of change.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Proposal to change the Code to put more ownership on MEP's to provide quicker turnaround times on meter installations should improve the timing on claiming ICPs. Don't know ANZSIC codes are now monitored every two weeks.		

Title: Derivation of Meter Readings		
Non-compliance	Description	
Audit Ref: 3.3.1 With: Clause 5 (c) of schedule 15.2 From/to: Entire audit period	Checks for phase failure not conducted and recorded by Delta. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Weak Breach Risk Rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	Phase failure is often not indicated on non-AMI meters. It is expected there would be a relatively small number of meters read by Delta where phase failure is present or visible.	

Actions taken to resolve the issue	Completion date	Remedial action Status
We will be working with Delta to find out when they plan to implement this change.	12 January 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Interrogate Meters Once		
Non-compliance	Description	
Audit Ref: 3.3.2 With: Clauses 7(1) and 7(2) of schedule 15.2 From/to: January 2016	One ICP was not read during the period of supply. The ICP was supplied for 68 days, and no actual read was obtained during that time. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	One vacant ICP was affected. No consumption was expected to occur during the period supplied.	
Actions taken to resolve the issue	Completion date	Remedial action Status
This ICP was switched in error. Due to the agreement that exists between Traders on switching vacant site Opunake was not able to remove themselves from this ICP. The Registry shows Advanced Meter Y but no reads were ever provided by the MEP. When the ICP switched away we were aware that the site was vacant so the switch away read provided was exact same as the switch in read, so there is no impact here in receiving no actual read.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Electricity Supplied Information Provision to the Reconciliation Manager		
Non-compliance	Description	
Audit Ref: 4.2 With: Clause 15.7 of part 15 From/to: Entire audit period	Electricity supplied files were incorrect for submissions between August and October 2016. Excluding the billing system issue resulted in over reporting of billed consumption for reports created from August to October 2016, electricity supplied is generally much lower than the billed submissions. Potential impact: Low Actual impact: Unknown Audit history: Three times previously Controls: Weak Breach risk rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	As billed information is not used for market settlement, however, significant differences between as billed and submitted consumption may indicate an issue with the information on either report. The audit risk rating is difficult to determine without understanding the cause of the differences.	
Actions taken to resolve the issue	Completion date	Remedial action Status
This issue is still under investigation. We will report to the EA when we understand the impacts of the AV-120 reports.	31/01/2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: HHR Aggregates Information Provision to the Reconciliation Manager		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 15.8 of part 15 From/to: N/A	HHR aggregates file does not contain electricity supplied information. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong if code is changed Breach risk rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	OPHL is reporting submission volumes at ICP level as expected by the reconciliation manager.	

Actions taken to resolve the issue	Completion date	Remedial action Status
Simply Energy will be working with other Traders to propose a change to correct this inaccuracy in the Code.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Permanence of Meter Readings for Reconciliation		
Non-compliance	Description	
Audit Ref: 5.1.2 With: Clause 4 of schedule 15.2 From/to: Entire audit period	Not all estimates replaced at R14. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	The forward estimate amount was 165,831 kWh across the two revisions checked.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As per the Simply Energy audit we are working with EMS to resolve this issue in their NHH Data Administration system.		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Creation of Submission Information		
Non-compliance	Description	
Audit Ref: 5.1.3 With: Clause 15.5(1) & 15.12 of part 15 & clause 2 of schedule 15.3 From/to: Entire audit period	Some errors in submission information. Potential impact: Medium Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 6	

Audit Risk Rating	Rationale for audit risk rating	
Medium	There are some issues with the Madras reconciliation calculations. The impact varies from issue to issue, but most individual issues are not expected to result in material differences to submitted volumes. The risk rating is assessed at medium because these issues require attention within the next 6-12 months.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Most of these issues are also covered in the Simply Energy audit and in a meeting held with the Electricity Authority. The missing start read has been investigated and where the meter read date is before the ICP start date there is actually no impact of this as the ICP start date signifies exactly when to start reconciling from.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Further validation is being done and we are hoping to release an enhancement in process on Start reads to ICP start dates to eliminate the mis-matches. This validation will also ensure when an ICP ends there is a mapping end read.	31 January 2017	

Title: Historical Estimate Process		
Non-compliance	Description	
Audit Ref: 5.1.4 With: Clauses 4 & 5 of schedule 15.3 From/to: Entire audit period	Incorrect HE calculations. Potential impact: Medium Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 6	
Audit Risk Rating	Rationale for audit risk rating	
Medium	There are some issues with the Madras reconciliation calculations. The impact varies from issue to issue, but most individual issues are not expected to result in material differences to submitted volumes. The risk rating is assessed at medium because these issues require attention within the next 6-12 months.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Simply Energy is currently working with EMS to resolve this issue.	28 February 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Forward Estimate Process		
Non-compliance	Description	
Audit Ref: 5.1.5 With: Clause 6 & 10(3) of Schedule 15.3 From/to: August 2015	The accuracy of the initial submission, in comparison to each subsequent revision is not within 15% and within 100,000kWh. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Only one month of the 10 reviewed had differences greater than $\pm 15\%$ and $\pm 100,000$ kWh. The difference was caused by a combination of an increase in new NHH ICPs, and an issue importing smart reads at the beginning of September 2015.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The issue of no smart reads processed was an internal issue and we believe was an isolated incident as it has only occurred once in the audit period.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Historical Estimate Reporting to RM		
Non-compliance	Description	
Audit Ref: 5.2.4 With: Clause 10 of schedule 15.3 From/to: entire audit period	HE targets not met for some NSPs for some revisions. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	The low HE percentages are largely caused by missing start reads, and mislabelling of HE as FE in some circumstances.	

Actions taken to resolve the issue	Completion date	Remedial action Status
Simply Energy is currently working with EMS to resolve this issue as it is a system related flaw. The Electricity Authority is already aware of the issue.		
Preventative actions taken to ensure no further issues will occur	Completion date	Investigating