

Compliance plan for Orbus Business Services Limited

Title: 2.4 Audit trails		
Non-compliance	Description	
<p>With: Clause 18 and 21 of Schedule 15.2</p> <p>From/to: Feb to Jun 2017</p>	<p>There is no audit trail for meter readings within WorkCentre.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach Risk Rating: 3</p>	
Audit Risk Rating	Rationale for audit risk rating	
Low	<p>Reads in WorkCentre are used only for switching activities, and only one ICP has switched out during the audit period. Access restrictions prevent unauthorised modification of meter readings. Reconciliation processes are completed by JCC.</p>	
Actions taken to resolve the issue	Completion date	Remedial action Status
Steve will download the initial reads through SFTP and these will be stored in a non-editable file within a separate server. Copies of the original read files will then be transferred into PowerCentre to calculate customer's usage and billing amounts. Initial files will not be editable.	Immediately	Investigating, controls over final readings are also needed.
Preventative actions taken to ensure no further issues will occur	Completion date	
We will regularly check to ensure the validity of the initial reads that are downloaded through SFTP to ensure that no changes have been made.	Immediately	

Title: 2.8 Trader contracts to permit assignment by the Authority		
Non-compliance	Description	
<p>With: Clauses 10.4, 10.7(2), 10.7(4), 10.7(5), 10.7(6) and 11.15B</p> <p>From/to: February to June 2017</p>	<p>ORBS terms and conditions are draft, and have not been finalised. The draft terms and conditions do not adequately cover the trader default processes.</p> <p>Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach Risk Rating: 3</p>	
Audit Risk Rating	Rationale for audit risk rating	
Low	<p>There are only two customers, both are staff members and understand their obligations. Section 5 of the draft agreement does cover transfer of customers.</p>	

Actions taken to resolve the issue	Completion date	Remedial action Status
As the terms and conditions are in draft form and yet to be reviewed by ORBS – this feedback will be provided to our lawyers and the terms and conditions amended to reflect this.	31/07/2017	Identified.
Preventative actions taken to ensure no further issues will occur	Completion date	
Our terms and conditions will be updated and published prior to ORBS taking on further customers. Terms and Conditions will be reviewed on a regular basis (in particular when there are industry or code changes relative to these needing to be amended) to ensure that they still meet industry requirements.	31/07/2017	

Title: 4.8 Losing trader provides information – switch move		
Non-compliance	Description	
With: Clause 3 of Schedule 11.3 From/to: 19 April 17	An incorrect AN response code was provided for one ICP with AMI metering. AA was applied instead of AD. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	There was only one error. The other participant could confirm AMI metering was in place for the affected ICP through other registry fields.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Process Documentation has been updated and will be followed when losing a client with Advanced Metering – this wasn't a processing error, just a knowledge gap that has been rectified.	Immediately	Identified.
Preventative actions taken to ensure no further issues will occur	Completion date	
As above, process documentation has been amended and therefore this error should not occur in future.	Immediately	

Title: 6.6 Derivation of meter readings		
Non-compliance	Description	
<p>With: Clause 3(1), 3(2), 3(3), 3(4) and 5 of Schedule 15.2</p> <p>From/to: February to early May 2017</p>	<p>Customer reads were incorrectly classified as actual reads, when they were not validated against actual reads and all the checks required were not completed.</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	Three ICPs were affected for less than 3 months. The reads were taken by ORBS staff members at their own homes, and are likely to be accurate. None of the meters were identified to be faulty. AMI reads are now received for all ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action Status
At the time of switch, we had an agreement with Vector AMS to provide AMI reads. Both SMCO meters were communicating however, Vector AMS had some internal issues which delayed the on-boarding of us as a new retailer. As we were unable to obtain reads through Vector AMS (and the agreement with Wells had not yet been completed), we completed customer own reads through manual reads or image verification – with a Wells agreement now completed, this service will be used for any required future manual reads.	Immediately	Identified.
Preventative actions taken to ensure no further issues will occur	Completion date	
As discussed, we now have an agreement with Wells for meter reading services – Wells will be used for any non-AMI meters or AMI meters that are non-communicating. This will ensure that all reads are accurate. With system changes, we now also have the ability to specify if the read is an 'actual read' or is classified as an 'estimate'. Future customer reads will be validated in accordance with Code, using an actual read	Immediately	

Title: 9.1 Identification of readings	
Non-compliance	Description
<p>With: Clause 3(3) of Schedule 15.2</p> <p>From/to: February to June 2017</p>	<p>PowerCentre records all reads entered as actual.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach Risk Rating: 3</p>

Audit Risk Rating	Rationale for audit risk rating	
Low	PowerCentre is only used for switching processes. Only one ICP has switched out, and an actual read was obtained for use in the switching file. There has been no impact to date.	
Actions taken to resolve the issue		Completion date
Software change now allows reads to be entered as either actual or estimate		Immediately
Preventative actions taken to ensure no further issues will occur		Completion date
ORBS will monitor that estimates are recorded correctly when they occur. This can be monitored as the need to estimate is communicated between ourselves and our agent.		Immediately
Cleared.		

Title: 12.11 Historical estimate process		
Non-compliance	Description	
With: Clause 4 and 5 Schedule 15.3 From/to: February to early May 2017	Customer reads were incorrectly classified as actual reads, resulting in them being used to calculate historic estimate. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Three ICPs were affected for less than 3 months. The reads were taken by ORBS staff members at their own homes, and are likely to be accurate. None of the meters were identified to be faulty. AMI reads are now received for all ICPs.	
Actions taken to resolve the issue		Completion date
This issue occurred as the MEP was unable to provide the reads. ORBS now have agreements with the relative MEPs for the ICPs, an arrangement with WELLS and are in the process of entering into agreements with other MEPs prior to taking up new ICPs. We now have the ability to specify, 'actual or estimate' within our system and therefore this information will be passed through for reconciliation purposes. ORBS intend to only accept customer reads in exceptional circumstances and these will be validated in accordance with Code ,this is ensuring that each customer read is validated against an actual read		Immediately
Preventative actions taken to ensure no further issues will occur		Completion date
We will check the reconciliation files to ensure that reads have been specified correctly and match what we have in our system (as currently reconciliation is completed by John Candy). Customer reads will be identified as such and monitored to ensure these are validated correctly.		Immediately
Identified		