

Compliance plan for Ecotricity

Non-compliance	Description		
Audit Ref: 2.1 With: 15.2 and 11.2 From: 01-Aug-16 To: 30-Jul-17	Incomplete or not accurate information identified within sections of this report Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Medium	No checking correctness registry information, ICPs information in Orion are out of sync with the registry, quality of reconciliation files is affected		
Actions taken to resolve the issue		Completion date	Remedial action status
LIS File has since been cleaned up as the Orion functionality was not operating. We have since synced the Registry up with Orion. Lis file discrepancy reports will be run every Monday, Wednesday and Friday and checked off on the Daily Processes sheet.		28/7/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Use a newly implemented Orion report which finds ICP discrepancies in conjunction with Database Macro provided for us which finds erroneous flags to check ECOT LIS file at a monthly on-going basis.			

Non-compliance	Description		
Audit Ref: 3.1.1 With: 5 of Schedule 11.3 From: 18-Apr-16 To: 08-Jun-17	Switch for 3 ICPs was backdated, 2 ICPs had incorrect type of switch assigned Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Small number of switches is affected, a minor impact on end-customer		
Actions taken to resolve the issue		Completion date	Remedial action status
The Procedure update has been made to include the timeframe required.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
ECOT will reinforce switching procedures and make sure controls are in place to prevent incorrect NT's from being sent on backdated switches.			

Non-compliance	Description		
Audit Ref: 3.1.3 With: 5 of Schedule 11.3 From: 01-Aug-16 To: 30-Jun-17	Incorrect information in CS files such as read and date of transfer read Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	It has impact on settlement outcomes and it affects end customers. It is a systematic problem		
Actions taken to resolve the issue		Completion date	Remedial action status
This is an Orion System side issue which since has since been resolved.		04/08/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
ECOT will no longer use the Registry's CS generation and rely solely on Orion's automated system, reducing the chance of human error. ECOT's has since updated the switching procedure documentation with misunderstanding cleared. We would be happy to provide evidence this is working.		31/08/2017	

Non-compliance	Description		
Audit Ref: 3.1.4 With: 6 of Schedule 11.3 From: 01-Jul-16 To: 30-Jun-17	Ecotricity does not use the read (E) provided by losing trader for switches NHH to HHR using AMI meter. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	Ecotricity often switches ICPs from NHH to HHR, in some instances the same switch event read is not used. It has impact on settlement income, on market participants		
Actions taken to resolve the issue		Completion date	Remedial action status
For all MEPs we actively use midnight reads except for AMS. Awaiting AMS to stop charging Ecotricity \$9 for midnight reads. Procedure will be updated once AMS provides these at no cost.		30/07/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>If the ICP Is going from NHH to HHR with an AMI meter, ECOT will always request a midnight read from the respective MEP if the received CS read was an estimate.</p> <p>If there is a difference between the CS estimate and the midnight read – an RR will be sent with the actual midnight read received.</p> <p>Ecotricity has been requesting and using midnight reads on CS's for all MEPs except for AMS.</p> <p>However, it should be noted that only AMS has been charging Ecotricity for midnight reads at \$9 per ICP which is prohibitive for Ecotricity to request midnight reads which we ended since the 1st of May.</p> <p>Further, AMS have noted that Ecotricity should not have access to midnight reads for periods relating to the switch date for privacy reasons because the losing retailer owns the ICP prior to the switch.</p> <p>AMS has noted that Ecotricity has a “high” number of midnight reads (39) which would imply that potentially Ecotricity is one of the best retailers performing this function.</p> <p>We therefore will not be requesting midnight reads from AMS until;</p> <ul style="list-style-type: none"> A. AMS make these midnight reads B. Stop charging Ecotricity for these midnight reads 		31/07/2017	

Non-compliance	Description		
Audit Ref: 3.2.1 With: 9 of Schedule 11.3 From: 01-Jul-16 To: 30-Jun-17	Registry notified later than 2 days after the arrangement comes into effect. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Small number of ICPs, no impact on settlement outcome but it could impact end-customer		
Actions taken to resolve the issue		Completion date	Remedial action status
Unfortunately there is not much that can be improved here as 3 of the 4 issues relate to incorrect details given to us by the customer OR the customer not realizing they had the extra ICPs noted.		31/07/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As noted in the Audit report however, this is an industry wide issue. We do however consult with the losing retailer who frequently are billing another customer incorrectly and are appreciative of the correction. There nothing further we can do to remedy this.		31/07/2017	

Non-compliance	Description	
Audit Ref: 3.2.2 With: 10 of Schedule 11.3 From: 01-Jul-16 To: 30-Jun-17	Final information for 10 ICPs were sent later than 5BD Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating:2	
Audit risk rating	Rationale for audit risk rating	
Low	Small number of ICPs affected. No impact on settlement outcomes	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>System generation of CS file repaired, allowing the procedure to be easier to manage. Preventative procedure has been implemented after the last audit to catch CS' which are almost due.</p> <p>However in our Daily Processes this is already done and checked daily.</p> <p>(refer to updated procedure which now includes BD requirements highlighted in yellow boxes).</p>		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Preventative procedure after the last audit has been followed through with and is evident in the last six months where there have been only 8 ICP processed later than 5 BD.</p> <p>A single staff member was appointed responsible for switching, a 2nd staff member has also since been trained.</p> <p>We will however continue to use the Switch Breach report as an indicative tool only. This was also recommended in our last audit.</p>		

Non-compliance	Description		
Audit Ref: 3.2.3 With: 12 of Schedule 11.3 From: 01-Jul-16 To: 30-Jun-17	Ecotricity does not use the read (E) provided by losing trader for switches NHH to HHR using AMI meter. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Small number of ICPs affected. No impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
This is covered in 3.1.4 For all MEPs we actively use midnight reads except for AMS. We are awaiting AMS to stop charging Ecotricity \$9 for midnight reads. Procedure will be updated once AMS provides these at no cost. Our suggestion to the EA is that regardless of if the losing retailer is trading NHH on a HH meter that the midnight read has to be used to increase efficiency in this process.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 3.2.7 With: 17 of Schedule 11.3 From: 01-Jul-16 To: 30-Jun-17	NW for ICP 0000000201TR27C was sent later than two calendar months after the event date (5 months) Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Only 1 ICPs affected, no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
One-off issue caused by human error. None to be taken			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Control procedures are already in place. (see attached Switching File References file regarding instructions)			

Non-compliance	Description		
Audit Ref: 3.3.2 With: 9 of Schedule 11.1 From: 01-Jul-16 To: 30-Jun-17	Incorrect information in the registry, type of profile, type of reconciliation Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 8		
Audit risk rating	Rationale for audit risk rating		
Medium	Ecotricity is growing very fast and incorrect information in registry impact other market participants		
Actions taken to resolve the issue		Completion date	Remedial action status
LIS File has since been cleaned up as the Orion functionality was not operating. We have since synced the Registry up with Orion. Lis file discrepancy reports will be run every Monday, Wednesday and Friday and checked off on the Daily Processes sheet.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Use a newly implemented Orion report which finds ICP discrepancies in conjunction with Database Macro provided for us which finds erroneous flags to check ECOT LIS file at a monthly on-going basis.			

Non-compliance	Description		
Audit Ref: 3.3.3 With: 9(1)(k) of Schedule 11.1 From: 01-Jul-16 To: 30-Jun-17	Incorrect ANZSIC code in the registry for 3 ICPs and for 9 ICPs appears to be incorrect Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Issue does not have impact on settlement outcome but it has impact on statistician analysis conducted by the Authority and Government		
Actions taken to resolve the issue		Completion date	Remedial action status
ANZSIC code field has been cleaned up in ORION DB and the Registry/LIS file respectively.		07/08/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
ECOT has identified that the majority of these errors stem from the initial set up of NEW ICP's and Builder's temporary suppliers. New control procedure is now in place to revisit those sites and change the ANZSIC code accordingly. This has been achieved by adding a new column in our NEW ICP process sheets to "Change ANZSIC Code". Sequentially, the ANZSIC code field will also be a part of the newly implemented LIS file checking procedure.		08/08/2017	

Non-compliance	Description		
Audit Ref: 3.3.5 With: 10 of Schedule 11.1 From: 01-Jul-16 To: 30-Jun-17	Delayed transactions (32%) to updating an ICP status to Active, 32% of trader transactions also delayed up to 231 days Potential impact: Low Actual impact: Low Audit history: twice previously Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	Medium audit risk rating is assigned to Medium because updates to the trader fields and status in the registry are delayed even up to 3 months and can have impact on settlement outcomes, switching and end-user customer. The number of ICPs traded by Ecotricity increased significantly and the current way in which Ecotricity operates gives a bleak outlook to the future.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP Registry is up to date with our Orion System.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Lis file importation into Orion System will remedy this and a number of other issues relating to the ICP registry. Further enhancements are being made to automate further the Registry with Orion,			

Non-compliance	Description		
Audit Ref: 3.3.8 With: 19 of Schedule 11.1 From: 01-Jul-16 To: 30-Jun-17	Incorrect use of status "Inactive in the registry for 11 ICPs Potential impact: Low Actual impact: Low Audit history: once previously Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	The only reason that Audit risk rating is assigned as Low is that a small number of ICPs I affected.		
Actions taken to resolve the issue	Completion date	Remedial action status	
This issue occurred due to the lack of knowledge of staff on how Orion as a system operates, the LIS file since been cleaned up so the status field should be correctly assigned.		Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
We've noticed from our investigation that Orion also lacks the appropriate fields for different inactive statuses which has also had some play in why this was so poorly managed. The Status list in Orion is being updated to incorporate all Registry Status options.			

Non-compliance	Description	
Audit Ref: 4.1.11 With: 9 of Schedule 15.2 From: 01-Jul-16 To: 30-Jun-17	90% target not met for 6 NSPs Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Only 6 NSPs are affected, in total 5 ICPs.	
Actions taken to resolve the issue		Completion date
No action required.		
Preventative actions taken to ensure no further issues will occur		Completion date
It is exceedingly difficult to maintain 90% target if ECOT only has a single or small amount of ICP's on that particular NSP.		
		Identified

Non-compliance	Description	
Audit Ref: 5.2.5 With: 17 of Schedule 15.2 From: 01-Jul-16 To: 30-Jun-17	Metrix data was not validated for 10 months as required the HHA profile Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	The report was reinstated and there were found no discrepancies for last 10 months	
Actions taken to resolve the issue		Completion date
System procedure is now in operation again.		31/07/2017
Preventative actions taken to ensure no further issues will occur		Completion date
Process to validate the MTRX data is now once again re-instated as a part of ECOT business operations to be actioned every month. Metrix have also noted that all their data is expected to HH certified in Q4 2017.		
		Cleared

Non-compliance	Description		
Audit Ref: 7.1.7 With: 4 of Schedule 15.2 From: 01-Aug-16 To: 30-Jun-17	For month Augut'15, Jan'16, Feb'16, and Apr'16 estimated volumes were not replaced by permanent estimates. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Small number of NSPs affected		
Actions taken to resolve the issue		Completion date	Remedial action status
The requirement for turning NHH estimates that are 14 months or older to Permanent Estimates is a requirement we were unaware off. Orion has been briefed to ensure NHH Estimates are turned to Permanent Estimates for Month 14 reporting.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Orion has been briefed to ensure NHH Estimates are turned to Permanent Estimates for Month 14 reporting.			

Non-compliance	Description		
Audit Ref: 7.1.8 With: clause 4 of Schedule 15.3 From: 01-Aug-16 To: 30-Jun-17	Incorrect calculation of historic estimates conducted by Orion (software used for creation of reconciliation files) Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating:3		
Audit risk rating	Rationale for audit risk rating		
Low	Ecotricity trades 191 NHH ICPs, most of ICPs are reconciled as HHR. It is a systematic problem with the software, which need to be monitored closely. Monthly volume for July'17 was 211,907 kWh		
Actions taken to resolve the issue		Completion date	Remedial action status
Issue has been reported to Agility since end of July, Agility development team has this one their highest priorities and ECOT is awaiting feedback.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once this functionality has been systematically repaired, no further issues will occur. This functionality was operational at last audit however appears to have been changed since. This is the highest priority that has been set for Agility (Orion).			

Non-compliance	Description		
Audit Ref: 7.2.3 With: clause 10 of Schedule 15.3 From: 01-Aug-16 To: 30-Jun-17	Historically HE targets not met for rev 3, 7, and 14. Significant number of NSPs (19) which did not meet the target in Mar'17 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	Ecotricity trades 191 NHH ICPs, most of ICPs are reconciled as HHR. It is a systematic problem with the software, which need to be monitored closely. Monthly volume for July'17 was 211,907 kWh		
Actions taken to resolve the issue		Completion date	Remedial action status
This is once again related to the fact that we maintain such a low number of NHH ICPs, meeting the 80% threshold is exceedingly difficult if there is only a single ICP on a particular NSP. Further internal discussion for how this issue needs to be remedied. Systematically, there does not seem to be any issues with this report, just the timing for when the ACTUAL WELLS reads are received.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once this functionality has been systematically repaired, no further issues will occur. This functionality was operational at last audit however appears to have been changed since. Thjs is the highest priority that has been set for Agility (Orion).			

Subject	Section	Recommendation	Description
Provision of information to registry	Error! Reference source not found.	Compare registry ICPs file with Orion information on regular basis	
Data estimated for ICP 0645085602LC874 did not balance register reads for 4/7/17	Error! Reference source not found.	Discuss with Agility why data estimation for ICP 0645085602LC874 did not use register reads	

Log files for electronic meter readings	Error! Reference source not found.	Request MEPs to send event log on a regular basis to assist data validation	
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Subject	Section	Issue	Description
"Active" status	Error! Reference source not found.	Information of ICPs Active status in the registry is unreliable	
Export HHR volumes for reconciliation when COUP meters used	Error! Reference source not found.	COUP is not in a position to provide HHR data for solar export channel. Ecotricity uses their own solar shape to create HHR data based on register reads	