

Compliance plan for Bosco Connect

Relevant Information		
Non-compliance	Description	
Audit ref: 2.1 With: Clause 10.6,11.2 & 15.2 From/to: 1/6/16-31/5/17	Some registry discrepancies identified and not being checked. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate because the management of status needs review and not all discrepancies are being checked for. The volume ICPs effected by the missing validations is small, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have implemented a new integrity report that is run daily to highlight ANZSIC code discrepancies. Regarding Active status misalignment: the date in EzyBusiness matches the date in the registry for the 2 ICPs in question. Regarding De-energised at pole fuse: EzyBusiness and Registry currently match, we run a weekly report and action as appropriate. The registry has been updated for ICP 0171405633LC64B to show submission as HHR from meter install date 12.04.2017. We are investigating the remaining noted discrepancy issue and will rectify.	30.09.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Changes to registry information		
Non-compliance	Description	
Audit ref: 3.3 With: Clause 10 of schedule 11.1 From/to: 1/11/16-31/5/17	Registry not updated within 5 business days of the event. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as the level of compliance for updates to registry are relatively high. The sample checked found the overall level of compliance has improved since the last audit, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have increased our focus in this area and should be meeting the 5 business days requirement going forward.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Provision of information to the registry		
Non-compliance	Description	
Audit ref: 3.5 With: Clause 9 of schedule 11.1 From/to: 10/1/17-9/5/17	Registry information not provided within 5 business days of commencement of supply for 6 new connections. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach Risk Rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong as the processes in place to manage new connections are robust and this is reflected in the short cycle time and the 88% compliance achievement. There were only six ICPs updated later than five days, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As per 3.3, We have increased our focus in this area and should be meeting the 5 business days requirement going forward.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

ANZSIC codes		
Non-compliance	Description	
Audit ref: 3.6 With: Clause 9(1)(k) of schedule 11.1 From/to: 1/8/16-31/5/17	6 active ICPs with no or incorrect ANZSIC codes 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	I have rated the controls as weak as beyond sign up this is not being monitored as part of the registry discrepancy process. Only 6 ICPs with the no or the incorrect ANZSIC code and this has no direct impact on reconciliation accuracy, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The 6 ICPs have been corrected.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Report now in place, run daily and actioned as appropriate.	Completed	

Management of "active" status		
Non-compliance	Description	
Audit ref: 3.8 With: Clause 17 of schedule 11.1 From/to: 1/12/16-31/5/17	Incorrect active dates recorded for two reconnected ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as 2 ICPs were found where the status did not align between Ezy Business and the registry and therefore SAP. These inaccuracies have a minor impact on reconciliation accuracy hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The dates in EzyBusiness matches the dates in the registry, we believe we are compliant here.		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	

Management of "inactive" status		
Non-compliance	Description	
Audit ref: 3.8 With: Clause 17 of schedule 11.1 From/to: 1/12/16-31/5/17	Status misalignment between Ezy Business and the registry for two ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as 2 ICPs were found where the status did not align between Ezy Buisness and the registry and therefore SAP. These inaccuracies have a minor impact on reconciliation accuracy hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Investigating, will correct if required.	31.08.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Losing trader response to switch request and event dates-standard switch		
Non-compliance	Description	
Audit ref: 4.2 With: Clauses 3 & 4 of schedule 11.3 From/to: 1/09/16-31/5/17	Incorrect sending of the AA response codes for transfer switches Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach Risk Rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as weak as the current logic is set to select from only two of the available codes and needs review. I have recorded the audit risk rating as low as there is no direct effect on settlement outcomes in relation to this clause.	
Actions taken to resolve the issue	Completion date	Remedial action Status
This is a system issue (Ezy Business is sending the AA automatically), we are working with our IT team to resolve.	First half of 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Losing trader must provide final information – standard switch		
Non-compliance	Description	
Audit ref: 4.3 With: Clause 5 of schedule 11.3 From/to: 1/09/16-31/5/17	Incorrect CS file content. Some late CS files. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach Risk Rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as weak as there are no checks in place to monitor CS file accuracy and no central view to manage the sending of CS files effectively. I have recorded the audit risk rating as low as the volume of switches for Bosco is low relative to the market.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Investigating but we believe this to be a system issue which will need to be rectified with the assistance of IT. We have increased our focus to avoid late CS files, a robust process is in place.	First half of 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Losing trader provides information-switch move		
Non-compliance	Description	
Audit ref: 4.8 With: Clauses 10 of schedule 11.3 From/to: 1/06/16-31/5/17	Incorrect sending of the AN code response sent. Some late CS files. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach Risk Rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	The controls in this area are weak. I have recorded the audit risk rating as low as there is no direct effect on settlement outcomes in relation to this clause.	
Actions taken to resolve the issue	Completion date	Remedial action Status
System enhancement required to rectify AN code issue, working with our IT team.	First half of 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are reviewing our EZYN switching process.	Before end of 2017	

Losing trader must provide final information- switch move		
Non-compliance	Description	
Audit ref: 4.10 With: Clause 11 of schedule 11.3 From/to: 1/09/16-31/5/17	Incorrect CS file content. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach Risk Rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as weak as there are no checks in place to monitor CS file accuracy. I have recorded the audit risk rating as low as the volume of switches for Bosco is low relative to the market.	
Actions taken to resolve the issue	Completion date	Remedial action Status
System enhancement required, scoping with IT.	First half of 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Gaining trader changes to switch event readings -switch move		
Non-compliance	Description	
Audit ref: 4.11 With: Clauses 12 of schedule 11.3 From/to: 1/06/16-31/5/17	1 late RR file sent. 1 late AC file sent. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach Risk Rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as strong as overall the controls are robust and the one late RR and AC file were exceptions. I have recorded the audit risk rating as low as these are exceptions rather than evidence of a systemic issue.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We will raise this with the EA to get guidance on how to be compliant in situations where a RR is required but it is outside of the allowed timeframe. 1 AC file was sent late due to human error. We have strong controls in place but will review our processes and training.	Before end of 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Withdrawal of switch requests		
Non-compliance	Description	
Audit ref: 4.15 With: Clauses 17 & 18 of schedule 11.3 From/to: 1/09/16-31/5/17	10 switch withdrawals sent later than 2 months of the event date. 3 late AW responses sent. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach Risk Rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	I have rated the controls as strong as the process to manage switch withdrawals is well understood and those backdated were actioned as soon as possible. I have recorded the audit risk rating as low as these are actioned as soon as possible with the intent that submission is as accurate as possible.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Regarding late switch withdrawals: although technically non-compliant, these withdrawals needed to be done and we are open to guidance from the EA on whether there are compliant work-arounds for these circumstances. Late AW responses were sent late due to human error. We have strong controls in place but will review our processes and training.	Before end of 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Distributed unmetered load		
Non-compliance	Description	
Audit ref:5.4 With: Clauses 11(1) of schedule 15.3, 10.14 & 15.13 From/to: 01/6/16 – 31/5/17	Incorrect submission in relation to one DUML databases. 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 moderate as Bosco has audited this database and corrections are in progress. The impact on settlement is minor as it is a small database, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Refer to DUML audit report. We are liaising with customer and other parties to make the appropriate corrections.	Before end of 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit ref:6.1 With: Clause 10.13 From/to: 07/12/16-21/06/17	Energy is not metered and quantified according to the code where meters are bridged. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Process now in place to reconcile estimated bridged usage.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

NHH meter reading application		
Non-compliance	Description	
Audit ref: 6.6 With: Clause 5 of Schedule 15.2 From/to: 1/9/16-31/5/17	Checks for phase failure not conducted and recorded for meters read by Datacol. Customer photo reads are treated as validated actual reads. Meter condition information obtained when meters are manually interrogated is not reviewed and acted upon. Potential impact: Low Actual impact: Low 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 Datacol where phase failure is present or visible. Customer photo reads only occur where it is not possible for the meter reader to gain access to perform a check reading. A relatively small number of meters are likely to be affected. According to a registry list provided as at 31/05/17, approximately 19% of Bosco's customers do not have AMI enabled meters, and a slightly higher proportion will be read manually. Of these, it is expected only a small proportion would have meter condition issues present.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Investigating phase failure issue and taking steps to ensure we are compliant going forward. Following clarification from the EA we are no longer entering customer photo reads as actual readings. Investigating meter condition issue and taking steps to ensure we are compliant going forward.	Before end of 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Interrogate meters once		
Non-compliance	Description	
Audit ref: 6.8 With: Clause 7(1) & (2) of schedule 15.2 From/to: entire audit period	No reporting in place to quantify ICPs not interrogated at least once during the period of supply. Potential impact: Low Actual impact: Unknown Audit history: None Controls: Weak Breach Risk Rating: 3	
Audit Risk Rating	Rationale for audit risk rating	
Low	It is expected a relatively small number of ICPs will not have their meters read during the period of supply.	
Actions taken to resolve the issue		Completion date
We have strong processes in place as indicated by only one ICP being affected, however we will investigate to see what occurred and review and improve our processes if required.		Before end of 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Refer above comments		
		Investigating

NHH meters interrogated annually		
Non-compliance	Description	
Audit ref: 6.9 With: Clause 8(1) & (2) of schedule 15.2 From/to: April 2017	For one ICP without an actual read for 12 months, exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met. 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 case was identified where exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met. An actual read was obtained after 13 months.	
Actions taken to resolve the issue		Completion date
We have strong processes in place as indicated by only one ICP being affected, however we will investigate to see what occurred and review and improve our processes if required.		Before end of 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Refer above comments		
		Investigating

NHH meters 90% read rate		
Non-compliance	Description	
Audit ref:6.10 With: Clause 9(1) & (2) of schedule 15.2 From/to: April 2017	For seven ICP without an actual read for four months, exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating:2	
Audit Risk Rating	Rationale for audit risk rating	
Low	In most cases the requirement to read 90% of ICPs connected to an ICP every four months was met. Seven cases were identified where exceptional circumstances did not exist, and the best endeavours requirement was not met.	
Actions taken to resolve the issue	Completion date	Remedial action Status
We have a 99% read rate overall. We are adjusting our reporting to ensure we are meeting the four month requirement going forward.	Before end of 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Correction of NHH meter readings		
Non-compliance	Description	
Audit ref: 8.1 With: 19(1) Schedule 15.2 From/to: 1/9/16-31/5/17	Eleven ICPs with consumption while disconnected, have not had all their consumption while disconnected reported. Where a meter reading is modified by Bosco, including being recorded against a different meter or register or having its value changed, it should be recorded as an estimated reading. Only readings that exactly match the details in the source file should be recorded as actual validated readings. 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 total consumption unreported is 95 kWh. In situations where meters are transposed, it is likely that the meter readings are correct. In other cases where reads are changed but remain actual, small volumes are usually involved.	
Actions taken to resolve the issue		Completion date
We are reviewing our processes for consumption while disconnected and modifying meter readings respectively.		30.09.2017
Preventative actions taken to ensure no further issues will occur		Completion date
Refer to above comments.		
		Investigating

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit ref: 9.6 With: Clause 17 of schedule 15.2 From/to: Entire audit period	AMI event information not adequately obtained and monitored. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Bosco is monitoring and actioning events emailed by the MEP.	
Actions taken to resolve the issue		Completion date
We will liaise with MEPs to ensure we are receiving the AMI event logs and will develop and implement a process so that we are taking the appropriate action.		Before end of 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Refer above comments		
		Investigating

HHR aggregates information provision to the RM		
Non-compliance	Description	
Audit ref: 11.4 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: Once Controls: Strong if code is changed Breach Risk Rating: 1	
Audit Risk Rating	Rationale for audit risk rating	
Low	Bosco is reporting submission volumes at ICP level as expected by the reconciliation manager.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The HHR aggregates file issue is a known issue as noted, Impossible for participants to be compliant due to anomaly within code. Regarding the recommendation to liaise with other participants to consider recommending a Code change, a code change request was submitted to the EA by Switch Utilities Limited in August 2016.		No action planned
Preventative actions taken to ensure no further issues will occur	Completion date	

Creation of submission of information		
Non-compliance	Description	
Audit ref: 12.2 With: Clause 15.4 From/to: October 2016- July 2017	Three ICPs had distributed generation, but no injection information was reported. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	All affected ICPs were switched out within four months of distributed generation being identified. Two switched out within one month. Bosco's normal process is not to accept customers with distributed generation. If a distributed generation customer is found, they arrange for the customer to switch the ICP to another retailer as soon as possible.	
Actions taken to resolve the issue	Completion date	Remedial action Status
These ICPs have all switched out. As soon as we identify that an ICP has DG we immediately take steps to advise the customer that we do not provide for DG.	Completed	No action planned
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments.		

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit ref: 12.8 With: Clause 4 of Schedule 15.2 From/to: September, October and November 2015 final revisions	Forward estimate remained for the final revisions for November 2015, December 2015 and January 2016. Not all meter readings were made permanent estimates by the 14 month revision. 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 forward estimate amount was 159 Kwh in the November 2015 14 month revision. Bosco will re-start their process to enter permanent estimate reads where an actual read cannot be obtained.	
Actions taken to resolve the issue	Completion date	Remedial action Status
As noted, we will be doing this going forward.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments.		

Reconciliation participants to prepare information		
Non-compliance	Description	
Audit ref: 12.9 With: Clause 2 Schedule 15.3 From/to: December 2015 onwards	One ICP with a category 3 meter has submission type NHH. 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 is affected, HHR metering is already installed.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The registry has been updated for ICP 0171405633LC64B to show submission as HHR from meter install date 12.04.2017.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Forward estimate process		
Non-compliance	Description	
With: Clause 6 of Schedule 15.3 From/to: Sep 15 and Oct 15	FE accuracy threshold not met for some balancing areas. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Initial data is replaced with revised data, and washed up.	
Actions taken to resolve the issue	Completion date	Remedial action Status
A robust process is in place; we will monitor and review the process as required. Some variance is to be expected due to no reads or estimated reads on the initial submission. To some extent, these variances are unavoidable (for example, as a result of a small numbers of ICPs having seasonal consumption only) and should be considered likely to recur.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		

Historical estimate reporting to the RM		
Non-compliance	Description	
Audit ref: 13.4 With: Clause 10 of Schedule 15.3 From/to: Oct 2015, Nov 2015, Apr 2016, May 2016, Jun 2016, Oct 2016, Nov 2016 and Dec 2016.	Historic estimate targets were not met for all revisions. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach Risk Rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Bosco were close to the target in all cases.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The improvements that we are implementing in terms of read attainment should be reflected in higher compliance in this area.	Before end of 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer above comments		