

Compliance plan for Hunet Limited October 2017

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: 10 Schedule 11.1 From: 08-Jan-14 To: 30-Sep-17	Registry information not updated within 5 business days of the event. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are much improved in this area, but some room for improvement has been identified. Hunet have made good progress in better managing ICP changes to the registry therefore the impact to reconciliation has been reduced to low.	
Actions taken to resolve the issue	Completion date	Remedial action status
In order to prevent this matter, we have created a management system to record all the jobs we submit and follow up daily whether the job is completed or turned down. This will allow us to chase up all the cases within 5 days without missing any. Non-compliance cases were recorded during the period, prior to when the new process was put in place.	01.11.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve, by updating returned metering paperworks in timely and accurate manner.	ongoing	

ANZSIC Codes		
Non-compliance	Description	
Audit Ref: 3.6 With: 9 (1(k) of Schedule 11.1 From: 01-Apr-17 To: 30-Sep-17	4 invalid ANZSIC codes assigned. Potential impact: None Actual impact: None Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Reporting is in place to identify discrepancies but there is room for improvement. The audit risk rating is low as this has no direct impact on submission accuracy.	
Actions taken to resolve the issue	Completion date	Remedial action status
Our call centre and sales agents obtain business classification from either customer or the website www.companiesoffice.govt.nz as part of a customer registration process. Our system is configured to prevent entry of any unknown ANZSIC code and entry of '000000' for business plans.	06.11.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve, and to ensure business classification is matching with the business name.	ongoing	

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
Audit Ref: 4.2 With: 3 and 4 Schedule 11.3 From: 01-Apr-17 To: 30-Sep-17	Two incorrect AN codes sent. Potential impact: None Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The sample checked found that codes are being applied correctly were due to human error , hence the control rating of moderate. The audit risk rating is low as this has no direct impact on submission accuracy.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet has enhanced some validation features on our internal switching panel, and our system now determines an AN code based on the information in our system. Non-compliance cases were recorded during the period, prior to when the new process was put in place.	16.10.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve	ongoing	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: 5 Schedule 11.3 From: 01-Apr-17 To: 30-Sep-17	CS file content incorrect. Some late CS files. Potential impact: Medium Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls have been improved during the audit period, but not all errors are being addressed. The incorrect read values being sent has a direct impact on reconciliation hence the audit risk rating of medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet has enhanced some validation features on our internal switching panel, and some details had been missed. 1. Last actual read on CS files 2. Average daily consumption for multiple meters and duplicated reads within a day 3. Late CS files 1 and 2 are currently in the process of developing and the project end date is 15.12.2017. For the late CS files, internal process changes were made to monitor 'Switch Breach Table' daily in Registry, until we develop our own switch breach report system.	15.12.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet has used the daily switch breach report from the registry and this incorrectly indicates that traders have ten business days to send the CS file, which we have followed. Therefore, this resulted in us sending some CS files which were deemed late. We are planning to develop our own switch breach report system and we may request for material change audit regarding this matter.	30.09.2018	

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: 10(1) Schedule 11.3 From: 01-Apr-17 To: 30-Sep-17	No AN file sent for 205 move switches. Some late CS files. 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 controls have been improved during the audit period, but further areas of improvement have been identified. The absence of AN files and the small number of CS files will have a minor effect on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet hadn't been aware of the mandatory AN files for move switches. Internal process changes have been made to ensure AN files are sent all the times. We are currently in the process of adding a feature that won't allow any CS out without AN, and the project end date is 15.12.2017	15.12.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve.	ongoing	

Losing trader determines a different date - switch move		
Non-compliance	Description	
Audit Ref: 4.9 With: 10(2) Schedule 11.3 From: 01-Apr-17 To: 03-Apr-17	Two event dates set earlier than the gaining traders requested date. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls for the audit period were manual hence the rating of moderate. Only two ICPs were found with an earlier event date therefore audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet has enhanced some validation features on our internal switching panel on our system, which doesn't allow us to put an earlier date than the gaining traders requested date. Non-compliance cases were recorded during the period, prior to when the new process was put in place.	16.10.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve.	ongoing	

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: 11 Schedule 11.3 From: 01-Apr-17 To: 30-Sep-17	CS file content incorrect. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
Low	The controls have been improved during the audit period, but not all errors are being addressed. The errors detected will have a minimal effect on reconciliation hence the audit risk rating of low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet has enhanced some validation features on our internal switching panel, and some details had been missed. 1. Last actual read on CS files 2. Average daily consumption for multiple meters and duplicated reads within a day 3. Late CS files 1 and 2 are currently in the process of developing and the project end date is 15.12.2017. For the late CS files, internal process changes were made to monitor 'Switch Breach Table' daily in Registry, until we develop our own switch breach report system.	15.12.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve.	ongoing	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: 12 Schedule 11 From: 15-Dec-16 To: 15-Sep-17	One late RR file and one late AC file. 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 control rating is moderate as the process is manual. The audit risk rating is low as this relates to two ICPs only.	
Actions taken to resolve the issue	Completion date	Remedial action status
1.Late RR file : We have had a new process where we request smart meter installation as soon as we gain legacy meters. This allow us to gain at least two actual reads within 4 month time from the gaining date. We will no longer have to send late RRs. 2.Late AC file : internal process changes have been made to monitor 'Switch Breach Table' daily in Registry until we develop our own switch breach report system to report when SLA is due.	Partially completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Late AC file : We are planning to develop our own switch breach report system and we may request for material change audit regarding this matter.	30.09.2018	

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: 17 Schedule 11.3 From: 03-Feb-16 To: 10-Aug-17	Six late switch withdrawals. Potential impact: Low Actual impact: Low Audit history: Multiple 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 The audit risk rating as low as this affected six ICPs only and they were actioned as soon as practicable.	
Actions taken to resolve the issue	Completion date	Remedial action status
We had had some data cleansing work internally to prepare for this audit and the six late switch withdrawals were made to correct the previous problems. I can strongly say Hunet now have good controls in place to update Registry information in timely and accurate manner, and will no longer have this issue.	Already completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will see if there are any other improvements we can make, whether it may be staff training or frequent reports to avoid any breaches.	ongoing	

Derivation of meter readings		
Non-compliance	Description	
Audit Ref: 6.6 With: Clause 5 of Schedule 15.2 From: 1/4/17-30/9/17	Meter condition notifications not being actioned. Datacol does not identify and report phase failure to Hunet. 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	Controls are rated as moderate as they are sufficient to reduce the risk most of the time, and since August meter condition reports are being actioned, but Datacol do not report phase failure to Hunet. The audit risk rating as is low as only 3% of Hunet's ICPs are manually read.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have identified the requirements and will contact Datacol to discuss further about this matter.	31.01.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will work with Datacol to resolve this issue.	31.03.2018	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: 6 Schedule 15.2 From: 01-Apr-17 To: 16-Oct-17	One midnight read incorrectly applied for MI switch. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Hunet now have robust validation in place to identify these and the switch will not complete until it is corrected, therefore controls are strong. The audit risk rating is low as this affects one day's consumption and the issue has since been addressed.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet has enhanced some validation features on our internal switching panel on our system which validate and ensure that the final reading is up to date. Non-compliance cases were recorded during the period, prior to when the new process was put in place.	16.10.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve.	ongoing	

Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: 7(1) and (2) Schedule 15.2 From: 09-Jul-15 To: 20-Sep-17	Five ICPS not read during period of supply. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls have been improved in this area since the last audit, hence the control rating of medium. The number of ICPs not read is low therefore the impact on reconciliation is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet is now working hard to obtain the actual reading by installing smart meters. Our new process involves convincing our customers to accept smart meter installation during the registration process, if the meter is legacy. We will reject their application if they refuse to have it installed. We have had few cases already where they had smart meters installed within a week after joining us.	31.08.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve, one of which is to replace legacy meter to smart meter.	ongoing	

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: 8(1) and (2) Schedule 15.2 From: 01-Apr-17 To: 30-Sep-17	Exceptional circumstances not proven for all ICPs sampled. Incorrect monthly meter reading report being provided to the Electricity Authority. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The continuing inaccurate information being reported indicates controls are weak. Overall the volume of unread ICPs reported is small and the report was over reporting the number of ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
To make improvement on cases where meter reading is absent due to no meter access, we have a new process in place, where we obtain building manager's contact details during the registration process for gaining access into property.	01.10.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue its focus on identifying and monitoring unread ICPs through various read reports.	ongoing	

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: 9(1) and (2) Schedule 15.2 From: 01-Apr-17 To: 30-Sep-17	Exceptional circumstances not proven for all ICPs sampled. Incorrect monthly meter reading report being provided to the Electricity Authority. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The continuing inaccurate information being reported indicates controls are weak. Overall the volume of unread ICPs reported is small and the report was over reporting the number of ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have had a new process that we obtain building manager's contact details at the customer registration stage for gaining access to the meters to improve meter access under two-four months of no meter access.	01.10.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will see if there are any other improvements we can make, whether it may be staff training or frequent reports to meet the requirements and the standard.	ongoing	

Correction of NHH meter readings		
Non-compliance	Description	
Audit Ref: 8.1 With: 19(1) Schedule 15.2 From: 01-Apr-17 To: 30-Sep-17	Corrections for 2 ICPs with bridged meters not submitted. Potential impact: Medium Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Improvements have been made in the management of vacant properties with the exception of bridged meters hence the control rating of moderate. The impact on reconciliation is low as the number of ICPs traded by Hunet is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
The bridged meters reviewed were consistently identified and unbridged, but reading corrections were not processed. Hunet have now identified the requirements and we are currently in the process of planning a new system regarding this matter.	28.02.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will adopt a new process that will adjust consumption on the unread periods for the bridged meters. These will be accurately calculated and reported onto the Submission and the Revision files. We will request for material change audit regarding this matter.	30.09.2018	

Electronic meter readings and estimated reading		
Non-compliance	Description	
Audit Ref: 9.6 With: 17 Schedule 15.2 From: 01-Sep-17 To: 30-Sep-17	Event logs not monitored for 16 ICPs read by FCLM. Potential impact: Low Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Metering events are managed for Metrix and AMS. The 16 FCLM ICPs events are not being monitored hence the control rating of medium. This affects 16 ICPs therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet now receives a daily reading consumption report from FCLM and all the previous readings have been backdated and corrected. Non-compliance cases were recorded during the period, prior to when the new process was put in place.	30.09.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve.	ongoing	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: 15.6 From: 01-Jun-17 To: 30-Jun-17	One ICP duplicated in the ICP day report. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak, due to the loss of the staff with expertise in this area. The impact is rated as low because the number of ICP days affected is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet have now identified the requirements and are currently in the process of planning a system replacement to enhance currently occurring issues.	28.02.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will review the 'ICP days' report process, and will request for material change audit regarding this matter once it is ready.	30.09.2018	

Allocation of submission information		
Non-compliance	Description	
Audit Ref: 12.3 With: 15.5 From: 01-Jun-17 To: 30-Sep-17	Submission not allocated correctly. Potential impact: Medium Actual impact: Unknown Audit history: Multiple Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	I was unable to determine the controls, therefore I have rated controls as weak. This has a direct impact to reconciliation and I was unable to quantify the actual impact to market but Hunet only trade on a small number of ICP therefore the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet have now identified the requirements and are currently in the process of planning a system replacement to enhance currently occurring issues.	28.02.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will review the 'Submission' report process, and will request for material change audit regarding this matter once it is ready.	30.09.2018	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: 4 Schedule 15.2 From: 01-Apr-17 To: 30-Sep-17	Some FE still exists at 14 months. Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
Low	Controls have been improved in the management of meter reading and meter changes hence the moderate control rating. The volume overall of HE is low at revision 14 therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet have now identified the requirements and are currently in the process of planning a system replacement to enhance currently occurring issues.	28.02.2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will review the 'Volume' report process, and will request for material change audit regarding this matter once it is ready.	30.09.2018	

Historical estimate process		
Non-compliance	Description	
Audit Ref: 12.11 With: 4 and 5 Schedule 15.3 From: 01-Apr-17 To: 30-Sep-17	HE scenarios not working correctly for one out of three scenarios checked. Volumes for corrections are not allocated correctly across the affected period. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Due to the change of staff the controls are rated as weak. The audit risk rating is low due to the volume of ICPs affected being small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet have now identified the requirements and are currently in the process of planning a system replacement to enhance currently occurring issues.	28.02.2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will review the report process, and will request for material change audit regarding this matter once it is ready.	30.09.2018	

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: 10 Schedule 15.3 From: 01-Apr-17 To: 30-Sep-17	Historic estimate thresholds were not met for some 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	Processes in place will mitigate risk most of the time hence controls are rated as moderate. The audit risk rating is low as the volume of FE overall is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Hunet now receives a daily reading consumption report from FCLM and all the previous reading have been backdated and corrected. Non-compliance cases were recorded during the period, prior to when the new process was put in place.	30.09.2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Hunet will continue to focus on optimizing our standard by identifying and monitoring our own performance and ways to improve.	ongoing	