

Compliance plan for Paua to the People

Title: Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 05-Jun-18 To: 10-Jun-18	ICP 0000123086TRFBA had an incorrect inactive status date applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as they are sufficient to prevent the risk of incorrect data most of the time. The risk rating is low because only one ICP as affected, and it was a manual processing error.	
Actions taken to resolve the issue	Completion date	Remedial action status
The 5 days of missing data (6/6/2018 to 10/6/2018) have been added to our consumption database and will be included in future submissions. We propose to submit revised submission back to early 2018 once we have moved to our new billing system.	March 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our new billing system will check for variances to the data held on the Registry for our ICPs daily so that we remain 100% in-sync. Any variation between the status of the ICP between the customer record and Registry will be flagged to an operator to fix within 24 hours. Because the Start and End dates will be in-sync it will highlight any inaccurate start dates and therefore any missing data.	February 2019	

Title: Audit trails		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 21 Schedule 15.2 From: 01-Feb-18 To: 11-Dec-18	System audit trails are not compliant. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate and the impact as low, because it is possible to trace information in the system to its source, and information on data modifications is available.	
Actions taken to resolve the issue	Completion date	Remedial action status
As part of the migration to our new billing system we propose to reload all data from raw AMS raw data files. Missing data estimates and HHR data modified to fit agreed switch reads will be reloaded with an appropriate audit trail.	February 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our new Billing system will have comprehensive audit trails for all data sources, data modifications (including estimates) and operator ID.	February 2019	

Title: Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 23-Feb-18 To: 02-Oct-18	Nine late status updates. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement. The risk is low as a small number of updates were affected.	

Actions taken to resolve the issue	Completion date	Remedial action status
The changes in status were picked up at the month end check of variances between the Registry and our systems which ensured that the reporting was correct even though the status change took more than 5 business days. No further action required.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our new billing system will check for variances to the data held on the Registry for our ICPs daily so that we remain 100% in-sync. Any variation between the status of the ICP between the customer record and Registry will be flagged to an operator to fix within 24 hours.	February 2019	

Title: Management of "inactive" status		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 05-Jun-18 To: 10-Jun-18	ICP 0000123086TRFBA had an incorrect inactive status date applied. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as they are sufficient to prevent the risk of incorrect status dates or codes being applied most of the time. The risk rating is low as only one ICP was affected, and it was a manual processing error.	
Actions taken to resolve the issue	Completion date	Remedial action status
The 5 days of missing data (6/6/2018 to 10/6/2018) have been added to our consumption database and will be included in future submissions. We propose to submit revised submission back to early 2018 once we have moved to our new billing system.	March 2019	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
Our new billing system will check for variances to the data held on the Registry for our ICPs daily so that we remain 100% in-sync. Any variation between the status of the ICP between the customer record and Registry will be flagged to an operator to fix within 24 hours.	February 2019

Title: Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 30-Sep-18 To: 30-Sep-18	The "AD" (advanced metering) AN response code was applied for one ICP without advanced metering installed. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, and the risk is assessed as low. Only one exception was identified, and it was due to human error.	
Actions taken to resolve the issue	Completion date	Remedial action status
This was an operator data entry error.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our new billing system will automate AN switches ensuring that all are completed immediately the NT is received. Automation will also avoid data entry errors as it will apply the correct AN Code for the situation.	February 2019	

Title: Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 03-Feb-18 To: 03-Oct-18	Nine late CS files. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as they are sufficient to ensure CS data is on time most of the time. One delay was caused by a backdated NT, and the other eight were between one and three business days late due to a delay in processing the files.		
Actions taken to resolve the issue		Completion date	Remedial action status
CS switches have already been completed for all ICP concerned.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We recently changed our switching policy and now complete the CS for the proposed date as soon as data is available for that date. Generally, this means that the CS is completed without the need to do an AN switch. Any MI switches are completed as soon as MEP data is available. Our new billing system will automate the CS switches. Paua will accept the proposed switch date from the gaining retailer unless it is an MI switch and the date does not match a leaving date we have from our customer. Where MI switch proposed dates are incompatible, they will be flagged to an operator to fix the last date of supply. The CS will be automatically completed as soon as actual data is received from the MEP for the last date of supply. ICP where no reads have been received but the CS is due will be flagged to an operator to review to either request data from the MEP or estimate the closing read and complete the CS.</p>		February 2019	

Title: Retailers must use same reading - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 18-Feb-18 To: 09-Jun-18</p>	<p>One late AC file. The agreed switch reading was not applied for two transfer switches. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be moderate overall, because most of the time Paua will apply the same reading as the other trader. Where actual AMI readings are available but differ from the agreed switch reading, it is likely that Paua will not apply the agreed switch reading.</p> <p>The breach risk rating is low, as the total under reported was 26 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Following migration to the new billing system Paua will add new modified HHR data for the two ICP concerned which will sit alongside (rather than be over-written) by the actual data. Paua will then create submissions to align the reconciliation reports to the agreed reads.		March 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Paua will continue to maximise the use of actual reads for switches. To this end the new billing system will automate the RR switches (if there is a variance to the read supplied in the CS) sending them as soon as data is received by the MEP. A dashboard will also identify any AC rejections so that we can negotiate with the losing trader or add modified reads to align to an erroneous agreed read. Our new billing system will allow an operator to add new modified HHR data for the two ICP concerned which will sit alongside (rather than be over-written) by the actual data. The modified data will only be used for reconciliation reporting.</p>		<p>August 2018</p> <p>February 2019</p>	

Title: Losing trader provides information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 06-Feb-18</p> <p>To: 06-Feb-18</p>	<p>Switch event dates were earlier than the requested date for one switch.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as strong. One instance of an early event date was identified, and the early date was for a valid reason.</p> <p>The impact is assessed as low, because the difference was two days and resulted in Paua's period of supply being removed.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
The breach was to clear Paua to the People from any supply as the customer changed their mind during the switch process and we were unable to get the gaining retailer to specify the correct date of supply.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The new billing system will automate AN and CS to switch the customer on the proposed switch date ensuring that reporting matches the expected days of supply.	February 2019	

Title: Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 18-Feb-18 To: 17-Jul-18	The agreed switch read was not applied for one switch move. One RR request contained requested readings inconsistent with the HHR data. 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 are assessed to be moderate overall, because most of the time Paua will apply the same reading as the other trader. Where actual AMI readings are available but differ from the agreed switch reading, it is likely that Paua will not apply the agreed switch reading. The breach risk rating is low, as the total under reported was 481 kWh. The RR containing an incorrect reading was rejected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Following migration to the new billing system Paua will add new modified HHR data for the ICP concerned which will sit alongside (rather than be over-written) by the actual data. Paua will then create submissions back to October 2017 to align the reconciliation reports to the agreed reads.	March 2019	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The current billing system supports using actual data for RR switches and in 12 months only one ICP did not use the actual read. In this case the losing trader supplied an actual read that was almost 6 months before the switch date. Unfortunately, the MEP supplied actual data outside the 5-day threshold. Since this event Paua has upgraded our system to make AC rejections more visible to an operator. Going forward, Paua will continue to maximise the use of actual reads for switches. To this end the new billing system will automate the RR switches (if there is a variance to the read supplied in the CS) sending them as soon as data is received by the MEP. A dashboard will also identify any AC rejections so that we can negotiate with the losing trader or add modified reads to align to an erroneous agreed read. Our new billing system will also allow an operator to add new modified HHR data for the two ICP concerned which will sit alongside (rather than be over-written) by the actual data, to be used for reconciliation reporting.</p>	<p>August 2018</p> <p>February 2019</p>	

Title: Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 26-Jan-18</p> <p>To: 23-Aug-18</p>	<p>Four late withdrawal acknowledgements.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time. Four AWs were sent one to two business days late.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>No corrective action can be taken.</p>	<p>Completed</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date
The new billing system will have a dashboard for all switching activity for GIVE. This will automatically update each day so potential breaches on responses can be avoided. In future if Paua to the People have not received a confirmation from customers we will complete the AW within the guidelines.	Early February 2019

Title: Metering information		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 27-May-18 To: 27-May-18	One incorrect RR read was provided. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as they are sufficient to ensure that the correct read is applied most of the time. The manual processes to create RR files can result in occasional data entry errors. The audit risk rating is low, because most reads provided are correctly applied. The RR containing an incorrect reading was rejected.	
Actions taken to resolve the issue	Completion date	Remedial action status
The RR Read was a data entry error and was correctly rejected by the losing trader.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The new system will automate the RR process so will eliminate the possibility of data entry errors. Where actual data is unavailable we accept the CS final read.	February 2019	

Title: Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.3 With: Clause 15.7 From: 01-Feb-18 To: 11-Dec-18	The AV120 report does not consistently reflect the quantity billed for the period. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. There appear to be some issues with the report logic which are causing discrepancies. The impact is assessed to be low, because there is no impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will redo submissions going back to early 2018 once Pua to the People has been moved to the new billing system.	Late February 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The new billing system will correct the current under-reporting error on AV120.	Early February 2019	

Title: Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.4 From: 28-Jun-18 To: 28-Jun-18	Some late revision files were provided. Revisions are only provided where there is a material change to submission data. 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 because revision submissions are normally provided as required, but there is some room for improvement. The audit risk rating is assessed to be low, consistent with the Authority's findings on the alleged breach.	
Actions taken to resolve the issue	Completion date	Remedial action status
Revised submissions going back to October 2017 will be submitted in late February following migration to the new billing system.	March 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The new billing system will automatically generate reconciliation reports (using the agreed reads). The system will check for any variance to the previous submitted report and alert an operator that reconciliation reports need to be uploaded to the RM Portal.	February 2019	

Title: Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 01-Feb-18 To: 11-Dec-18	Some late revision files were provided. Revisions are only provided where there is a material change to submission data. Some incorrect submission data was provided. 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 are rated as moderate because revision submissions are normally provided as required, but there is some room for improvement. The audit risk rating is assessed to be low, consistent with the Authority's findings on the alleged breach. The impact of the incorrect data is assessed to be low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Revised submissions going back to October 2017 will be submitted in late February following migration to the new billing system.	March 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The new billing system will automatically generate reconciliation reports (using the agreed reads). The system will check for any variance to the previous submitted report and alert an operator that reconciliation reports need to be uploaded to the RM Portal.	February 2019	