

Compliance plan for Plus – 2019

Relevant information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clauses 11.2 & 15.2 From: 01-Mar-18 To: 13-Feb-19	Some registry and submission related errors. 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 recorded as moderate because they mitigate risk most of the time but there are still some improvements to make. There is a minor impact on settlement and other participants therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The one ICP still at 1,12 has been made Active.		Feb 19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional training on event dates has been completed.		Feb 19	

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.12 With: Clause 10.36 From: 01-Mar-18 To: 13-Feb-19	Arrangements not in place with seven MEPs. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on participants is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Arrangements are in place with these 7 MEPs		Feb 19
Preventative actions taken to ensure no further issues will occur		Completion date
All 7 were contacted and arrangements have been confirmed via email pending actual MEP agreements being finalised.		Feb 19
		This clause requires specific clauses to be in the arrangement. This matter can be cleared once the agreements are finalised.

Provision of information to the registry		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 9 of schedule 11.1 From: 19-Jul-18 To: 13-Feb-19	Two status updates were not processed within five business days of the event on the Registry. The incorrect event date was used for one ICP. One electrically connected ICP is still at the 1,12 status. 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 recorded as moderate because Plus Energy has monitoring in place but is having difficulty with the provision of information from the field. Settlement did not occur for January 2019 for one ICP, therefore there is a minor impact. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP 0000570007NRAF2 has been made active.	Feb 19	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional training has been completed on event dates.	Feb 19	

Losing trader must provide final information - standard switch			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 01-Oct-18 To: 14-Nov-18	3 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 are recorded as moderate because an attempt was made to monitor late files but reliance on the registry switch breach report is not advised. The impact on settlement and participants is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We were relying on the registry switch breach report which provides for 10 days to complete switches.		Feb 19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional training has been completed on switches (3 days not 10)		Feb 19	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 17-Apr-18 To: 15-May-18	One late NT file. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk to an acceptable level. The impact on settlement and participants is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
No action required.		Feb 19
Preventative actions taken to ensure no further issues will occur		Completion date
Employees have been reminded of the requirement to process switch requests within 2 days.		Feb 19
		Identified

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 13-Mar-18 To: 19-Sep-18	4 late AW files. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on participants is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required. There were valid reasons for all files.	Feb 19	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Aug-18 To: 31-Dec-18	3 ICPs not read within the 4-month window, exceptional circumstances not demonstrated. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICPs concerned have been added to the Wells meter reading rounds.		Jan 19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Employee responsible has been reminded of the need to add ICPs requiring manual reads to the Wells meter reading rounds in a timely manner.		Feb 19	

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7 of part 15</p> <p>From: 06-Feb-18</p> <p>To: 13-Feb-19</p>	<p>One electricity supplied file not sent for Jan 2018.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because the process for file creation and aggregation is correct, but there was one file not sent.</p> <p>There is no impact on settlement or other participants therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The Billed Volumes for Jan 2018 were submitted however in error the wrong month was included on the file and it was sent as 201802. AV-120 file for the month in question was sent immediately the error was identified.	Feb 2019	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Existing processes have a checklist item to confirm AV-120 (and all other files) are sent and receipt confirmed.</p> <p>This file appears to have been sent with the wrong settlement month. Processes and functionality have changed so that AV-120 files are now generated through the RM tool with common Month and Party settings for all files. Note this happened a year ago, all other files for that month were correctly submitted.</p>	In place	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 of part 15 From: 01-Apr-17 To: 13-Feb-19	Aggregates file contains submission information. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the aggregates file is correct compared to the functional specification. There is no impact on settlement because the aggregates file is only used for reporting, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
As we understand this from the Auditor, we are processing this correctly and it's the code that the auditor is auditing against that is incorrect. I believe this was highlighted in our report last year as well but the code has yet to be corrected therefore the auditor is again recording this as non-compliant.		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
No action required on our part. The EA needs to amend the code accordingly. We assume this effects all retailers and not just us.		

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: Clause 15.5 of part 15 From: 01-Feb-19 To: 13-Feb-19	Late submission for one ICP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The ICP has been made active, meter reads occurring and all data is being submitted.	Feb 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional training on builders supply installations has been completed.	Feb 2019	

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 of schedule 15.3 From: 01-May-17 To: 13-Feb-19	HE targets not met for some NSPs for the 3-month revisions. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because there are sound processes in place and very few ICPs are unread. There is a minor impact on settlement because the actual data is likely to be different to the estimated data, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
All ICPs responsible for the proportion of non-attainment of HE per NSP have since been placed on monthly Wells reading rounds.	Jan 19	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The employee responsible has been reminded of the requirement to add ICPs requiring manual reads to the Wells reading rounds in a timely manner.	Feb 19	