

## Compliance plan for Prime Energy

<b>Title: Relevant information</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2  From: 01-Nov-18 To: 14-Feb-19</p>	<p>One ICP with distributed generation has an incorrect profile recorded on the registry. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are rated as strong as they are sufficient to ensure that profiles are recorded correctly most of the time.  The impact is assessed to be low, Prime intends to process a backdated correction.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
ICP switched at the end of 2018 was listed as L but early 2019 it changed to B. We were unable to update the Registry due to error message 'not valid for trader'. We contacted fixed this, we updated the code.	4/3/2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
All sales & CS staff are well trained to look out for this. However; this was a late generation approval by the network. This check is already in our ICP discrepancy report so we are not expecting this to be repeated in the future, not unless it's a backdated update by the network.	4/3/2019	

<b>Title: Changes to registry information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 01-Mar-18 To: 24-Dec-18	Eight late status updates. Seven late MEP nominations. 34 late trader updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate because they 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 most updates were completed on time or soon after they were due.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We endeavour to update the Registry within 5 working days of receiving the paperwork. Most of the late nominations were backdated data correction.	N/A	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We have an internal SR report, so dates are monitored. However; its difficult to avoid non-compliance when MEP change their codes or if we are correcting previous data. We are monitoring this on an ongoing basis	N/A	

<b>Title: Provision of information to the registry manager</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 3.5 With: Clause 9 Schedule 11.1  From: 18-Oct-18 To: 30-Oct-18	The registry was not updated within five business days of commencement of trading for two ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2

<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls are rated as moderate, because they are sufficient to ensure that the registry is updated on time most of the time.</p> <p>The risk rating is low, as two updates were one to two days late.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
The Registry updates were done 1-2 business days late due to late paperwork. In some cases, paperwork were received but had 2 retailers trying to claim the same ICP, therefore; additional site visits were required to confirm the correct retailer.		N/A	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
We are consistently monitoring our Service Request report to ensure updates happen within 5 working days. We are also planning to build a database which will create auto reminders for anything over 3days. We anticipate this release will take approx. 6-9 months.		Dec 2019	

<b>Title: ANZSIC codes</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k)) of Schedule 11.1</p> <p>From: 08-Apr-17</p> <p>To: 11-Feb-19</p>	<p>Two ANZSIC codes were incorrectly recorded, and were updated during the audit.</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>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls are rated as strong, as they are sufficient to ensure that most ICPs have the correct ANZSIC code recorded.</p> <p>The impact is low. These were isolated exceptions, and in one case the customer had not provided clear information on their application. Both exceptions were corrected during the audit.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
ANZSIC codes were updated promptly during the audit		14/2/19	Cleared

<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>
We rely on the customers to inform us about the nature of their business during signup. Some customers are reluctant to do this so it makes it difficult for us. We are planning to carry out annual ANZSIC codes washups starting later in the year. This will require additional resources.	Dec 2019

<b>Title: Losing trader response to switch request and event dates - standard switch</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3  From: 11-Dec-18	An incorrect AN response code was applied for one transfer switch. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls over AN responses are strong. Codes are manually selected but staff are trained to ensure that the correct response code will be applied most of the time. The impact is assessed as low. Information available on the registry confirmed that the ICP with an incorrect response code had advanced metering, and the switch was later withdrawn.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
This was processed by a temp covering staff leave. The switch ended up being cancelled.	N/A	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We will ensure adequate training is provided to all future temps and proper supervision is also available.	14/2/19	

<b>Title: Losing trader must provide final information - standard switch</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3  From: 05-Apr-18 To: 18-Dec-18	At least ten estimated daily kWh values were not consistent with the average consumption for the last read to read period in transfer CS files.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Weak  Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as weak, because the process does not ensure that estimated daily kWh relates to previous read to read period.  The audit risk rating is low because the average daily kWh information provided reflected the true average daily kWh for a longer period, and the other information in the CS files was correct.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We always used yearly average consumption because it provides a better picture for seasonal ICPs. However; upon confirmation from EA & the Registry specs we have put immediate measures in place to manually calculate the average daily consumption based on last 2 actuals.	1/3/2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We are working with our IT department to change the logic used in calculating the average daily consumption. We are estimating about 6 months for this change to be rolled out because intensive testing will be required to oversee the impact to the submission data & the billing processes.	Nov 2019	

<b>Title: Retailers must use same reading - standard switch</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 4.4 With: 6(1) and 6A Schedule 11.3  From: 14-Aug-18 To: 15-Aug-18	One CS read was recorded in Orion with an incorrect date and read sub-type.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as strong, because all other reads checked during the audit were found to be recorded correctly.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> <li>• The read type was correct, so there is no impact on the historic estimate calculations. Only the read sub-type, which is not used by the reconciliation process was incorrect.</li> <li>• The read date was moved back one day, but remained within the same month. There was minimal impact on the historic estimate calculations and correct data will be provided for revision submissions.</li> </ul>		
Actions taken to resolve the issue		Completion date	Remedial action status
This was corrected straight away during the audit.		14/2/19	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Switch Interface project is still in progress. We endeavour to have the switch processes automated by early 2020 as this requires intensive testing. By automating this process, we will eliminate the human errors. In the meantime, we are putting extra checks in place to ensure the start read dates in Orion match the switch event dates.		Jan-Feb 2020	

Title: Gaining trader informs registry of switch request - switch move	
Non-compliance	Description
<p>Audit Ref: 4.7 With: Clause 9 Schedule 11.3</p> <p>From: 03-Apr-18, 01-Oct-18 and 03-Dec-18</p>	<p>Switch move NTs were sent for three ICPs where the customers were not moving in effective from the switch date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>The controls are rated as moderate, because the switch type is not correctly applied in certain circumstances.</p> <p>The audit risk rating is low. There is no impact on settlement or other participants, and it helps to ensure ICPs are switched on the correct date. There is some impact on market switching statistics.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>The NTMI is a move switch but this also always the gaining retailer to choose the switch date. NTMI allows the losing retailers to set the dates. In some cases where customers are ending their fixed term contract with the losing retailer, they are adamant to start their account with PRME from a certain date as they do not wish to be billed on standard rates by the losing retailer. Some retailer put customers on auto rollover so the contract automatically rolls over &amp; then customers are charged termination fee. In these instances, we sent the request as NTMI to abide by the contracted start date. All retailers mutually agreed to this process at the Retailer Switching Forum.</p>		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We ask customers to final their account with the losing retailer first but when sites are won by tenders or RFPs, then this is not always possible. May be the EA could consider a new NT code (NTTC – Transfer Contract or NTUC – Under Contract)? And the gaining retailer could set the event date. We are happy to discuss this further with EA and discuss other possible ways around this.</p>		

<b>Title: Losing trader provides information - switch move</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3  From: 23-May-18</p>	<p>An incorrect AN response code was applied for one switch move.  Potential impact: Low  Actual impact: Low  Audit history: Twice  Controls: Strong  Breach risk rating: 1</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	<p>The controls over AN responses are strong. Codes are manually selected but staff are trained to ensure that the correct response code will be applied most of the time.  The impact is assessed as low. Information available on the registry confirmed that the ICP with an incorrect response code had advanced metering, and the switch was later withdrawn.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
It was just a one off instance and the AN was processed by a temp covering staff leave. The switch ended up being cancelled.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Proper training will be provided to all temps/new staff in the future. We have also created detailed procedure documents to be used for future training.	03/2019	

Title: Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: 11 Schedule 11.3  From: 21-Mar-18 To: 11-Oct-18	One incorrect last actual read date was recorded in a switch move CS file. At least eight estimated daily kWh values were not consistent with the average consumption for the last read to read period in switch move 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	
<b>Low</b>	Controls are rated as weak, because the process does not ensure that estimated daily kWh relates to previous read to read period. The audit risk rating is low because the incorrect last actual read date has a low impact, and the average daily kWh information provided reflected the true average daily kWh for a longer period.	
Actions taken to resolve the issue	Completion date	Remedial action status
Our average daily consumption is based on yearly consumption to provide a better idea of the comm usage. It accounts for seasonal consumption which read-read doesn't do. We have gained sites with read-read average of 0 and being an irrigation pump on a large farm, the meter reader was unable to obtain reads until months later which resulted in the customer receiving a large catchup bill. So read-read average doesn't work for seasonal sites. However; to comply with the read-read requirement, as an interim fix we are manually calculating the average daily consumption for all switch losses.	Mar 2019	Identified



Preventative actions taken to ensure no further issues will occur	Completion date
We are working on a permanent fix to change the logic to calculate the average consumption based on last 2 actuals. This should be available by the end of the year.	Nov-Dec 2019

Title: Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>From: 04-May 18 and 01-Aug-18</p>	<p>Two late RR files for switch moves.</p> <p>One RR file was not supported by two validated actual readings.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as moderate as they are sufficient to ensure that RR files are normally provided within four months, and RR readings are usually supported by at least two validated readings</p> <p>The impact of the late files is low, because</p> <ul style="list-style-type: none"> <li>the late files were provided within one business day of switch completion.</li> <li>The RR supported by one actual read and one customer read was accepted, and the customer read is likely to be correct based on other reads received for the ICP.</li> </ul>	
Actions taken to resolve the issue	Completion date	Remedial action status
Late RR's were caused by backdated switches so not much we could do here to avoid a non-compliance. The RR was within 1 day of the CS completion date.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
When given a choice between late RR and the correction of data, we choose to correct the data as this is more likely to affect our other parts of the business, eg: RM submissions. We have already changed our process so customer photo reads are never treated as actuals so it won't be used for RR calculations	Mar 2019	

<b>Title: Withdrawal of switch requests</b>			
<b>Non-compliance</b>		<b>Description</b>	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 07-May-18 To: 09-May-18		Two late switch withdrawals. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>		<b>Rationale for audit risk rating</b>	
<b>Low</b>		Prime have robust controls in place, and NW files are normally sent on time. The impact is low. The files were sent within six business days of the switch being completed.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
We always initiate the NWs within the acceptable timeframe but it's difficult to avoid this with backdated switches. We process backdated switches if the customers insist on being billed by Prime for the entire period.			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
It is difficult to avoid a noncompliance on backdated switches because the timeframe is calculated from the event date rather than the CS completion date.			

<b>Title: Distributed unmetered load</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 5.4 With: Clause 11 Schedule 15.3, Clause 15.37B & 16A.26 From: 01-Mar-18 To: 14-Feb-19	Prime's Wellington DUML database has not been audited. One database audited late. Potential impact: Medium Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 4

Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The effectiveness of the controls is recorded as moderate as Prime are working to confirm database accuracy, and arrange an audit.</p> <p>The audit risk rating is assessed to be medium based on estimated load of 33,985 kWh per annum.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have compiled the database, however; some site visits by the customer's contractors have indicated certain connections don't exist. They either do not have a power supply or have been supplied via the neighbouring buildings. The customer is carrying out onsite load tests to confirm the supply point, which of course has taken longer than we predicted.		30/6/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have just submitted the data base we prepared for auditing. However; the total connections will change in the coming months, once the customer has completed their site investigations.		31/7/2019	

Title: NHH meter reading application	
Non-compliance	Description
<p>Audit Ref: 6.7 With: Clause 6 Schedule 15.2</p> <p>From: 14-Aug-18 To: 15-Aug-18</p>	<p>One CS read was recorded in Orion with an incorrect date and read sub-type.</p> <p>Potential impact: Low Actual impact: Low Audit history: None</p> <p>Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>Controls are rated as strong, because all other reads checked during the audit were found to be recorded correctly.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> <li>• The read type was correct, so there is no impact on the historic estimate calculations. Only the read sub-type, which is not used by the reconciliation process was incorrect.</li> <li>• The read date was moved back one day, but remained within the same month. There was minimal impact on the historic estimate</li> </ul>

	calculations and correct data will be provided for revision submissions.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The date was corrected by 1 day during the audit process.	02/2019	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We have manual checks in place to ensure correct days are submitted in our AV-110 so incorrect date would not affect the submissions in any way. However; once the switch process is automated, the dates will automatically align with the Registry.	manual check was implemented 01/2019	

<b>Title: NHH meters interrogated annually</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2  From: 29-Oct-18 To: 30- Oct-18	One meter reading frequency report was submitted one business days late.  Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong, and the risk rating is low because all other reports checked were sent on time, and there was no impact. The submission was late due to a staff absences.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The statutory days were incorrectly calculated which led to the late submission.		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We are changing the report submission date from Day 20 to day 15. This will ensure the FRM is always submitted before the due date.	May 2019	

<b>Title: NHH metering information data validation</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 9.5 With: Clause 16 Schedule 15.2  From: 01-Mar-18 To: 14-Feb-19	Where a subsequent read is lower than the switch in reading, an estimated reading is applied. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate, because most reads are expected to be recorded correctly. If a read difference is greater than $\pm 200$ kWh, or if Prime doesn't expect the difference will catch up with a month, a read renegotiation request will be issued. The impact is low, because any differences are expected to be less than $\pm 200$ kWh. Once reads catch up to the switch read, all consumption will be accounted for. Because almost all ICPs supplied by Prime are commercial, consumption is expected to catch up quickly.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
AMI - if actual reads are lower than gaining reads, we initiate RR regardless of the difference in the reads. NHH – If the actual reads are lower than gain reads by less than 200 units for transfer switches, then we bill zero consumption or slightly estimate usage based on the average daily consumption received in the CS file. If the actual read is lower than CS files for a move-in, then we insist on RR but this depends if the other retailer accepts or not.	03/2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
All exceptions are investigated thoroughly before approving it. AMI differences will lead to RR despite the switch type of read variance.	03/2019	

<b>Title: Calculation of ICP days</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Mar-18</p> <p>To: 14-Feb-19</p>	<p>The AV110 report includes inactive ICP days.</p> <p>The AV110 calculates the ICP days from the date the ICP was entered into Orion, which may differ from the actual start date.</p> <p>Four ICP days were reported with an incorrect submission type.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are rated as weak, because they are unlikely to consistently prevent errors in the ICP days calculations.</p> <p>The impact is rated as low. Because consumption is only reported where an ICP is active in Orion, Prime's method ensures that if any consumption occurs during an inactive period it will be reported. Review of the registry list showed Prime supplies 13 inactive ICPs. For 67 of the 70 NSPs checked (96%), the ICP days reported were consistent with the registry.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We are now actively validating our ICPs submission against the LIS files to ensure accuracy.	Feb 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We can mark sites as inactive in Orion but it means they are not included in any submission process. However; we need inactive sites in the network reports, AV-120 & AV-080 if any consumption was reported on the meter. We are working with Agility to develop a process where we can differentiate different types of inactive sites and include them in all the reports, other than AV-110. This process will require intensive pre & post release testing.	Dec 2019	

<b>Title: Electricity supplied information provision to the reconciliation manager</b>			
<b>Non-compliance</b>		<b>Description</b>	
Audit Ref: 11.3 With: Clause 15.7  From: 01-Mar-18 To: 14-Feb-19		Where multiple invoices and reversals occurred billed consumption does not always reflect what was billed during the month.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Moderate  Breach risk rating: 2	
<b>Audit risk rating</b>		<b>Rationale for audit risk rating</b>	
<b>Low</b>		Controls are rated as moderate as they were sufficient to ensure that most NSPs had accurate information reported, but there was room for improvement.  The impact is low. In most cases one invoice is produced per month covering the entire month.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
We have raised this concern with Agility and they are investigating this at the moment. We are hoping to have a permanent fix in place by the next audit		Dec 2019	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Previously our AV-120 data was pro rata so we fixed this and its working fine. Once we fix the reversal issue, we will automate the av-120 vs AV-080 analysis for every submission. This is an area we haven't explored before but we are keen to have a robust submission database for detailed checks against previous submissions & different submission files.		Nov – Dec 2019	

<b>Title: Accuracy of submission information</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 12.7 With: Clause 15.12  From: 01-Mar-18 To: 14-Feb-19	Some submission information was incorrect.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Weak  Breach risk rating: 6

Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls are weak as they will not consistently prevent errors in submission information. Prime have improved some controls over submission information during the period, and cleared two of the issues raised in the previous audit.</p> <p>The impact is assessed to be medium based on the volume differences between revisions. Prime has or intends to submit revision reports containing correct information.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Our manual checks were carried out against the last submission only. We were in the process of implementing checks against all previous submissions, but we don't have enough resource to carry this out manually. However; we are already working on an automated database to check every submissions against previous files.		Nov – Dec 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once we have the automated database available, it won't only check AV-080 M1 against D4, but also validate the data against the LIS file and compare with the AV-120. The scope is to have same validation for all file types (AV-110, AV-120, AV-080)		Nov – Dec 2019	

Title: Permanence of meter readings for reconciliation	
Non-compliance	Description
<p>Audit Ref: 12.8</p> <p>With: Clause 4 of Schedule 15.2</p> <p>From: Jun-17, Jul-17 and Aug-17 r14</p>	<p>Some estimates were not replaced by revision 14.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>Controls are rated as moderate as they were sufficient to ensure that most NSPs had 100% historic estimate by revision 14, but there was room for improvement.</p> <p>Total forward estimate for the three months reviewed was 136,922 kWh. This was not true forward estimate, because most of the forward estimate was caused by incorrect classification of the historic estimate, and the estimated closing reads which should have been treated as permanent estimate were used to calculate the forward estimate.</p>



<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We have corrected all historic opening and closing switch read types so they are treated as Actuals for submission purposes. This only affects the HE calc so no impact on the volume submissions.	Mar 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We are implementing a report to capture the opening & closing read types and the reference notes. We will run this report on a monthly basis and check all sw/in & sw/out read types are correct.	Jul – Aug 2019	

<b>Title: Historical estimate reporting to RM</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: Jun-Aug 17 (r14), Jan-Mar 18 (r7) and Jun-Aug 18 (r3)	Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate as they were sufficient to ensure that most NSPs are close to the target values, but there was room for improvement. The impact is assessed to be low. Much of the forward estimate was caused by incorrect classification of the historic estimate, and the estimated closing reads which should have been treated as permanent estimate were used to calculate the forward estimate.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
We already have staff making outbound access calls to ensure we can obtain actual reads every month or at least once a quarter. We believe this will help us improve the HE%.	Feb 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We have been processing permanent estimates for sites that don't have 100%HE at 14 months and are now at 12months. We are now processing permanent estimates on a monthly basis for sites not read once every 12months.	Apr 2019	

