

## Compliance plan for Body Corporate Power 2019

Non-compliance	Description		
Audit Ref: 1.11 With: 15.37A  From: 26-Mar-19 To: 26-May-19	Audit report completed late  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The audit risk rating is recorded as low because the number of ICPs traded by is small therefore any impact to the market will be minor		
Actions taken to resolve the issue	Completion date	Remedial status	action
Audit will be confirmed at least 3 months prior; Account was payment was confirmed on 28th March with Audit in April. We will now confirm Audit Payment in February and complete Audit in March. We were also on-boarding a new retailer, so this caused unnecessary delays	February 1st, 2020 for full payment	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
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<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 2.1 With: 11.2  From: 01-Oct-18 To: 08-Nov-18	Incorrect profile for some ICPs Potential impact: Low Actual impact: Low Audit history: None 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 as they require some improvement. There was a minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating low		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This was part of the on-boarding process with PowerEdge, three ICPs on the PowerCo Network were PV1 profile only as I had thought the submission was HHR. They were at the time NHH so should have been RPSPV1.		Completed	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Registry Training will be booked for PowerEdge and we now have controls on changes to the registry		Next Registry Training Day and update of internal processes	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 2.2 With: 15.35  From: 01-Oct-18 To: 08-Nov-18	Body Corporate Power failed to take all practicable steps to provide complete and accurate submission volumes for October 2018.  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>	Controls are recorded as strong. The issue was clarified with the Market Administrator.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This was an investigation because the EA noticed significant volume change in BCPL submission data. It was an investigation for which we were fully cleared. There was no Breach		N/A	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 3.3 With: 10 of Schedule 11.1  From: 01-May-18 To: 31-Mar-19	Backdated trader and status events in the registry  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 as they require some improvement. There was a minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating low		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>

BCPL provided Mercury Energy and the EA a photo of the Temporary Builders Supply removed from the pillar. While at the same time Mercury had the ICP as Active in the registry. After considerable analysis of registry codes the only status that we could find that recognised an active status for an inactive ICP was reconciled elsewhere. We were later advised and agreed to use the status installation in progress. We carried out what was requested by us but think that Mercury was in Breach for having an Active ICP at the same premises when there was no way it could have been Active. BCPL correctly recorded and submitted all volume through the installation in progress to one ICP at Clifton Court	BCPL amended and self-breached to backdate all ICPs as requested by the EA.	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 3.9 With: 19 of Schedule 11.1  From: 01-May-18 To: 31-Mar-19	Incorrect status applied to one ICP  Potential impact: Low  Actual impact: Low  Audit history: Once previously  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. BCPL has a good understanding of different statuses in the registry. There was minor impact on settlement outcomes because of the small number of ICPs. Audit risk rating low		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This ICP was created by Counties Power and Assigned to BCPL. After our experience with Clifton Court we checked all ICPs that had in-active status. This ICP has no MEP and No Meter so it is not a vacant. The Status was changed and back dated correctly and recorded with a self-breach		Complete	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
BCPL is now aware of the EA's preferred status for installations that are inactive.		Internal process updated	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 4.3 With: 15.8 From: 07-Nov-18 To: 09-Nov-18	The last read date for 1 ICP was incorrect 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>	Controls are recorded as strong. The process is well controlled. Audit risk rating is low, no impact on settlement outcomes.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
BCPL Transferred 10 ICPs to Genesis Energy on 1st October 2018. For these ICPs BCPL is a tier 2 retailer. BCPL maintains the customer relationship and invoices the customer. This ICP had an estimated read and we had an opportunity to physically read the meter on 5th November. Genesis was slow to change registry so BCPL updated the reading to actual			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Internal processes update that if a switch is in progress not to update registry but update gaining retailer			

Non-compliance	Description		
Audit Ref: 4.5 With:6(3)(b) of Schedule 11.3  From: 07-Nov-18 To: 09-Nov-18	The switch event read rejected 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		
<b>Low</b>	Controls are recorded as strong, requirements well understood. Audit risk rating is low, no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL internal process picks up discrepancy in Actual Read file and estimated. In this incidence the Actual Read file to Midnight was 1 kWh variance to the submitted file and triggered a RR .		Updated internal Process	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Accept RR small variances if from AMI meter reading		Updated internal Process	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 19-Apr-18 To: 01-May-19	CS file for one ICP was sent late. Potential impact: Low Actual impact: Low Audit history: None 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 as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Review Switching Code part 10 (1) of Schedule 11.3.			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Seek registry training and update internal process documentation		30/06/2019	

<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.9 With: 10(2) of Schedule 11.3  From: 01-May-19 To: 05-May-19	For one ICP a different date was assigned (in the past) than requested by the gaining trader.  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>	The controls are rated as moderate as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Client requested change over date of 1st February. NT with 1st Feb sent to Mercury and acknowledged on 5th February		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Accept proposed change over date by Losing retailer to remain compliant.	01/05/19	



<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 4.12 With: 14 of Schedule 11.3 From: 07-Oct-18 To: 11-Nov-18	Incorrect type of switch used for one ICP. 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>	The controls are rated as moderate as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This was one of the ICPs transferring to Genesis at 40 Rosedale Rd. It was a BTS supply that should have changed to permanent. However, Genesis decommissioned the ICP. BCPL had to create a New ICP to continue with the upgrade. The New ICP is Category 3.			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
This was a one-off error by Genesis. In the future BCPL will upgrade ICPs before engaging Genesis.			

<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 4.15</p> <p>With: 17 of Schedule 11.3</p> <p>From: 26-Jul-18</p> <p>To: 30-Nov-18</p>	<p>One NW file was sent late.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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>	The controls are rated as moderate as they require some improvement. Better understanding is required of the difference between a standard switch and a switch move. Audit risk rating is low, no impact on settlement outcomes.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
As Above, this ICP was a BTS that should have gone to permanent. The new CAT 3 meter was installed and live. Genesis instead decommissioned the ICP. BCPL had to create a new ICP. In the registry the new meter was assigned to the decommissioned ICP.			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
BCPL created a new ICP and FCLM moved the meter to the new ICP. The issue of Genesis decommissioning the BTS was resolved.		Complete	

Non-compliance	Description		
Audit Ref: 12.9 With: 2 of Schedule 15.3  From: 01-May-18 To: 31-Mar-19	Mismatch of submissions profile between the registry and submitted files for four ICPs; switch event meter reading not used for one ICP.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate as they require some improvement. Management of profiles in the registry for installations with solar panels must be better managed between BCPL and JC Consulting. Audit risk rating is low because there is no impact on settlement outcomes because of the small number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
BCPL has updated internal processes and will seek Registry training for PowerEdge which BCPL is onboarding. In this instance the Switch Event Meter Reading was 1 kWh variance. In the future AMI Event reads will be as provided.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This example illustrated that our controls were too tight regarding variance in AMI reads as provided by an MEPS between gaining and losing retailers.		Complete	