Compliance plan for Bosco – 2019

Relevant information			
Non-compliance	Des	scription	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2	Some corrections not conducted as soon as practicable. Potential impact: Medium Actual impact: Low		
From: 01-May-18 To: 31-Mar-19	Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	I have rated the controls as moderate there is room for improvement.		
	The impact on settlement and participating is low.	pants is minor; the	erefore, the audit risk
			Remedial action status
Response: Non compliance accepted and remedial action completed		June 2019	Identified
Action:			
	as been corrected and ICP orrected at time of audit.		
Unbilled usage for 4 bridge be reconciled as part of r	ged meters has been entered and will next reconciliation.		
Preventative actions to	aken to ensure no further issues will occur	Completion date	
Existing process alerts of inactive usage when it hit 50 kwh since disconnection. The process is under review to reduce this alert threshold.		Aug 2019	
Reporting will be implem meters.	ented to identify non advancing	Dec 2019	
	407BP454 was human error and as rovided and documentation has been		

Electrical Connection of Point of Connection			
Non-compliance	Description		
Audit Ref: 2.11	Three ICPs were not certified within five business days of reconnection.		
With: Clause 10.33A	Potential impact: Low		
	Actual impact: Low		
	Audit history: Once		
From: 23-Apr-18	Controls: Weak		
To: 29-Jan-19	Breach risk rating: 3		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as weak as there are no controls in place to ensure reconnected ICPs with uncertified metering are certified within five business days.		
	The audit risk rating is low as this has	no direct impact o	on reconciliation.
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response:			Identified
Non compliance accepted and remedial action on going		June 2019	i dentined
Action:			
Jobs have been raised with meter owners to attend to certify metering.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Participant comments			
Bosco will review the process and implement a working solution to meet the code obligations		July 2019	

Changes to registry information			
Non-compliance	Description		
Audit Ref: 3.3	Registry not updated within 5 business days of the event.		
With: Clause 10 of	Potential impact: Low		
schedule 11.1	Actual impact: Low		
	Audit history: Multiple		
From: 04-Apr-18	Controls: Moderate		
To: 17-Jan-19	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as moderate as controls will mitigate risk most of the time, but there is room for errors to occur.		
	The audit risk rating is low as the num	ber of ICPs affect	ed is small.
Actions ta	Actions taken to resolve the issue Completion Remedial action sta		Remedial action status
Response: Non compliance accepte	d and remedial action on-going	On going	Identified
Action:			
Over all the number of ICPs notified greater than 5 days has reduced. Will keep focus on reducing event updates.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Particular focus on activi reduce human errors.	ties linked to MEP nomination to	Continued Focus	

ANZSIC codes			
Non-compliance	Description		
Audit Ref: 3.6	Eight ICPs had incorrect ANZSIC codes assigned.		
With: Clause 9 (1(k) of	Potential impact: Low		
Schedule 11.1	Actual impact: Low		
	Audit history: None		
From: 15-Feb-19	Controls: Moderate		
To: 15-Feb-19	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as moderate as they are sufficient to ensure that most ANZSIC codes are recorded correctly.		nt to ensure that most
	The impact is low. Most ANZSIC codes were found to be correct, and the ANZSIC code for ICP 0087710603LC6A9 was corrected during the audit. There is no impact on settlement.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action on-going		Cleared
Action:			
ANZSIC codes have been updated for ICPs that are still with Bosco May 2019			
Preventative actions taken to ensure no further issues will occur		Completion date	
ANZSIC codes entered by customers when opening an account at an existing Bosco property are now being applied. Previously the existing ANZSIC code was applied.		May 2019	

Management of "inactive" status			
Non-compliance	Description		
Audit Ref: 3.9	Incorrect inactive status for 11 ICPs.		
With: Clause 19	Potential impact: Medium		
Schedule 11.1	Actual impact: Low		
5 04 14 40	Audit history: None		
From: 01-May-18	Controls: Moderate		
To: 31-Mar-19	Breach risk rating: 2		
Audit risk rating	Rationale fo	r 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 and participants is minor; therefore, the audit risk rating is low.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action completed	17 May 2019	Cleared
Action:			
11 ICPs have been corrected			
Preventative actions taken to ensure no further issues will occur		Completion date	
Existing process alerts of inactive usage when it hit 50 kwh since disconnection. Under review to reduce this alert threshold		Aug 2019	

Non-compliance	Description		
Audit Ref: 4.3	Some incorrect CS file content.		
With: Clause 5 of	Four late CS files.		
schedule 11.3	Potential impact: Low		
	Actual impact: Low		
	Audit history: Twice		
From: 02-Jul-18	Controls: Weak		
To: 22-Nov-18	Breach risk rating: 3		
Audit risk rating	Rationale fo	r audit risk rating	
Low	I have rated the controls as weak as they are not sufficient to ensure that all CS content is consistently correct.		
	The impact is assessed to be low, because:		
	 last actual read dates do not impact on settlement, and are only used as an indicator of how accurate estimates are likely to be; estimated daily kWh will only impact on settlement if it is used to calculate forward estimate for NHH settled ICPs by the gaining trader where actual readings are not received; vacant ICPs are expected to have little or no consumption during vacant periods; and a small number of CS files were late, and all were completed within 12 business days. 		
Actions ta	ken to resolve the issue	Completion	Remedial action status

Actions taken to resolve the issue	Completion date	Remedial action status
Response: Non compliance disputed	May 2019	Disputed
Action:		
Checked the readings on CS for 1000021025BPC48 and found that the correct readings were included in the CS. The last occupied readings were not used, the readings used were the last actual read.		
Bosco don't use the average from the last read period. The average is calculated between the last two actual reads that are not less than 60 days apart. This is the average daily kWh used for our internal purposes and also the average used on the CS. Examples in separate document.		
Preventative actions taken to ensure no further issues will occur	Completion date	
A modification has been made to EzyBusiness so that the last actual read date will be used instead of the last read date.	May 2019	

Retailers must use same reading - standard switch			
Non-compliance	Description		
Audit Ref: 4.4	One transfer RR was not supported by two validated actual reads.		
With: Clauses 6(1) and 6A Schedule 11.3	Three switch event readings were recorded with an incorrect read type. Potential impact: Low		
From: 17-May-18 To: 29-Sep-18	Actual impact: Low Audit history: Once Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as moderate, because Bosco is aware of the requirement for RRs to be supported by at least two validated readings.		
	The impact is assessed to be low, because a small number of ICPs are affected and there is no impact on reconciliation.		
Actions taken to resolve the issue Completion Remedial action date		Remedial action status	
Response: Non compliance accepte	d and remedial action completed	May 2019	Identified
Action:			
Human error Bosco are aware of the requirements of the RRs to be supported by 2 validated actual reads which will be mandatory before accepting any reads.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Relevant documentation has been updated to highlight the requirement of 2 validated actual reads		May 2019	
	y switch event readings and event and are submitted as received in the		

Non-half hour switch event meter reading - standard switch			
Non-compliance	Description		
Audit Ref: 4.5 With: Clauses 6(2) and (3) Schedule 11.3	19 RRs meeting the requirements of Clause 6(2) and (3) Schedule 11.3 were invalidly rejected. Potential impact: Low Actual impact: Low		
From: 22-Jun-18	Audit history: Once		
To: 03-Oct-18	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as weak, as they are not sufficient to ensure that read change requests issued under Clause 6(2) and (3) Schedule 11.3 are accepted. The audit risk rating is low as most RRs issued under this clause are accepted.		
Actions tal	ken to resolve the issue	Completion date	Remedial action status
	Response: Non compliance accepted and remedial action complete		Identified
Action:			
Identified as human error. Process changed.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Process in place to always check smart reads before accepting/rejecting.		May 2019	

Non-compliance	Des	scription	
Audit Ref: 4.10	Some incorrect CS file content.		
With: Clause 11 of	165 late switch move CS files.		
schedule 11.3	Potential impact: Low		
	Actual impact: Low		
	Audit history: Twice		
From: 29-May-18	Controls: Weak		
To: 04-Feb-19	Breach risk rating: 3		
Audit risk rating	Rationale fo	r audit risk rating	:
Low	I have rated the controls as weak as the content is consistently correct.	ney are not suffici	ent to ensure that all CS
	The impact is assessed to be low, beca	ause:	
	 last actual read dates do not impact on settlement and are only used as an indicator of how accurate estimates are likely to be; 		
	 estimated daily kWh will only impact on settlement if it is used to calculate forward estimate for NHH settled ICPs by the gaining trader where actual readings are not received; 		
	 vacant ICPs are expected to have little or no consumption during vacan periods; and 		
	 a small number of CS files we business days. 	re late, and all we	ere completed within 12
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepted		May 2019	Identified
average is calculated bet are not less than 60 days	rage from the last read period. The tween the last two actual reads that apart. This is the average daily kWh poses and also the average used on arate document.		
Preventative actions to	aken to ensure no further issues will	Completion	

occur

A modification has been made to EzyBusiness so that the last actual read date will be used instead of the last read date.

date

May 2019

Gaining trader changes to switch meter reading - switch move			
Non-compliance	Description		
Audit Ref: 4.11	One switch move RR was not supported by two validated actual reads.		
With: Clause 12	One RR file was accepted but the reads were not updated.		
Schedule 11.3	Six switch event readings were recorded with an incorrect read type.		
	Potential impact: Low		
	Actual impact: Low		
From: 17-May-18	Audit history: Twice		
To: 20-Dec-18	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as moderate, be for RRs to be supported by at least two		·
	The impact is assessed to be low, because a small number of ICPs are affected and there is no impact on reconciliation. For the ICPs which switched out on the reading for the last day they were occupied, the consumption during the vacant period is expected to be low.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action complete	May 2019	Identified
Action:			
System issued identified type read without the file	where the system sometimes send E e being registry rejected.		
Human error Bosco are aware of the requirements of the RRs to be supported by 2 validated actual reads which will be mandatory before accepting any reads.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Issues has been raised w	Issues has been raised with IT to make required changes. Dec 2019		
Relevant documentation has been updated to highlight the requirement of 2 validated actual reads		May 2019	
-	e read once RR file has been		

Losing trader provision of information - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.13	One late HH AN file.		
With: Clause 15	Potential impact: Low		
Schedule 11.3	Actual impact: Low		
	Audit history: None		
From: 01-Nov-18	Controls: Moderate		
To: 13-Nov-18	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as moderate, as Bosco has now confirmed their HH switch loss process.		
	The impact is low, because one AN file	e was sent five bu	siness days late.
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action complete	May 2019	Identified
Action:			
This was a first occurrence due to lack of knowledge.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Process in place to follow	up should this happen again.	May 2019	

Metering information			
Non-compliance	Description		
Audit Ref: 4.16	Some incorrect CS file switch event re	adings.	
With: Clause 21	Four late CS files.		
Schedule 11.3	Potential impact: Low		
	Actual impact: Low		
From: 29-May-18	Audit history: None		
To: 04-Feb-19	Controls: Weak		
10.04-FED-19	Breach risk rating: 3		
Audit risk rating	Rationale fo	r audit risk rating	
Low	I have rated the controls as weak as they are not sufficient to ensure that all CS content is consistently correct.		
	The impact is assessed to be low, a small number of CS files with incorrect readings were identified.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action complete	May 2019	Identified
Action:			
Changes made to breach report and will start to switch sites on day 5/6 of the breach report.			
Preventative actions taken to ensure no further issues will occur		Completion date	
A modification has been made to EzyBusiness so that the last actual read date will be used instead of the last read date.		May 2019	
Changes to breach report implemented going forward			

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 10.13	While a meter was bridged, energy was not metered and quantified according to the code.		
With clause 10.13	For three ICPs with generation, energy was not quantified according to the code.		
	Potential impact: Low		
	Actual impact: Low		
From: 20-Mar-18	Audit history: Twice		
To: 19-Oct-18	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	Controls are rated as moderate as they are sufficient to reduce the risk most of the time.		reduce the risk most of
	The audit risk rating is assessed to be low, as a small number of ICPs are affected.		
Actions ta	Actions taken to resolve the issue Completion Remedial action statu		
Response: Non compliance accepted and remedial action complete		In place	Identified
Action:			
Daily process in place to alert us if we have an ICP or a pending application for an ICP that has generation capacity. We will then work with the customer to help them find a retailer.			
Energy was quantified fo removal of bridge.	or ICP 0005497620RN5E following		
Preventative actions to	aken to ensure no further issues will occur	Completion date	
Continue with daily alert process for generation requesting customer switches to another retailer for date of generation installation.		In place	
meter is smart when rais reconnection is raised be	eated for agents to easily check if a ing reconnections so a smart fore a manual reconnection. We feel ng on manual reconnections.		

Interrogate meters once			
Non-compliance	Description		
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2	Best endeavours not demonstrated fo during the period of supply. Potential impact: Low Actual impact: Low	r ICPs not interro	gated at least once
From: 01-May-18	Audit history: Twice		
To: 28-Feb-19	Controls: Weak		
	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are weak, because no reporting on ICPs not interrogated at least once during the period of supply is available. The impact is assessed as low because four and 12 month read attainment rates are high.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Current process tasks agents to outbound call customer after 4 In place Identified non reads.			Identified
Preventative actions taken to ensure no further issues will Completion date			
Improvement identified to include other communication options (text, letter or email) when trying to contact customers.			

NHH meters interrogated annually			
Non-compliance	Description		
Audit Ref: 6.9	4 ICPs not read and exceptional circun	nstances were no	t present.
With: Clause 8(1) and	Potential impact: Low		
(2) Schedule 15.2	Actual impact: None		
	Audit history: Twice		
From: 01-May-18	Controls: Moderate		
To: 28-Feb-19	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.		itigate risk most of the
	The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Current process tasks agents to outbound call customer after 4 In place Identified non reads.		Identified	
Preventative actions taken to ensure no further issues will occur		Completion date	
Improvement identified to include other communication options (text, letter or email) when trying to contact customers.			

NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2	The best endeavours requirement was months. Potential impact: Low Actual impact: Low	s not met for six I	CPs unread for four
From: 01-May-18	Audit history: Twice		
To: 28-Feb-19	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, because they are sufficient to ensure that most ICPs supplied for four months will receive at least one actual read.		
	The risk is rated as low, a small number attainment rates are high with close to		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Current process tasks agents to outbound call customer after 4 In place Identified non reads.		Identified	
Preventative actions taken to ensure no further issues will occur		Completion date	
Improvement identified to include other communication options (text, letter or email) when trying to contact customers.			

Identification of readings			
Non-compliance	Description		
Audit Ref: 9.1	Three readings incorrectly labelled.		
With: Clause 3(3)	Potential impact: Low		
Schedule 15.2	Actual impact: Low		
	Audit history: Twice		
From: 01-Jun-18	Controls: Moderate		
To: 28-Feb-19	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.		itigate risk most of the
	The impact on settlement and particip rating is low.	eants is minor; the	erefore, the audit risk
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action complete	May 2019	Identified
Action:	Action:		
Process has been changed to reflect this correctly.			
Preventative actions to	aken to ensure no further issues will	Completion	
	occur	date	
	made to EzyBusiness so that the last used instead of the last read date.	May 2019	

Calculation of ICP days			
Non-compliance	Description		
Audit Ref: 11.2	ICP days incorrect for two ICPs where backdated switches out had occurred.		
With: Clause 15.6	Potential impact: Low		
	Actual impact: Low		
From: 01-May-17	Audit history: None		
To: 30-Jun-18	Controls: Strong		
	Breach risk rating: 1		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are recorded as strong be	ecause they have	been recently improved.
	The impact is minor because this report is used as an indicator; therefore, the audit risk rating is low.		
Actions ta	Actions taken to resolve the issue Completion Remedial action status date		
Response: Non compliance accepted and remedial action complete		May 2019	Identified
Action:			
ICP days will be re-calcul the wash-up files.	ICP days will be re-calculated correctly and will be reflected in the wash-up files.		
Preventative actions taken to ensure no further issues will Completion date			
Bosco have an integrity check called "Check ICP Event History Matches Consumption" that is run before we generate the submissions. This check was only looking back 1 month and so missed a problem that had been caused by a backdated switch out. This integrity check has now been extended to look back 16 months and so will now identify any similar problems in the future.		May 2019	

Creation of submission information				
Non-compliance	Non-compliance Description			
Audit Ref: 12.2 With: Clause 15.4	For three ICPs with generation, energy was not metered and quantified according to the code.			
With clause 15.4	Eight ICPs with consumption while inactive did not have status corrections processed.			
	Four stopped meters did not have corrections processed to estimate consumption during the stopped period.			
	Potential impact: Low			
	Actual impact: Low			
From: 01-May-18	Audit history: Twice			
To: 31-Mar-19	Controls: Moderate			
	Breach risk rating: 2			
Audit risk rating	Rationale fo	r audit risk rating		
Low	Controls are rated as moderate overall, as they are sufficient to ensure that most data is correctly reported.			
	Corrections for stopped or defective meters are not always processed, and corrections for consumption while inactive are not consistently processed.			
	The impact for stopped meters is assessed to be low, all affected ICPs were domestic and consumption during the stopped period was estimated to be low. The consumption while inactive which has not been reported is estimated to be low.			
	If a distributed generation customer is switch the ICP to another retailer as so	•	nge for the customer to	
Actions ta	ken to resolve the issue	Completion date	Remedial action status	
Response: Non compliance accepte	d and remedial action complete	May 2019	Identified	
Action:				
Correction of all 11 ICPs have been corrected.	with consumption while disconnected	June 2019		
	Unbilled usage for 4 bridged meters has been entered and will be reconciled as part of next reconciliation.			
Preventative actions taken to ensure no further issues will Completion date				
Existing process alerts of inactive usage when it hit 50 kwh since disconnection. Under review to reduce this alert threshold.		Aug 2019		
Reporting will be implem meters	nented to identify non advancing	Dec 2019		

Accuracy of submission information			
Non-compliance	Des	scription	
Audit Ref: 12.7 With: Clause 15.12	Eight corrections for consumption while inactive, and six corrections for stopped or faulty meters were not processed.		
With Gladse 15112	For three ICPs with generation, energy was not metered and quantified according to the code.		
From: 01-May-18	For one read change, the accepted read was not recorded and used for submission.		
To: 31-Mar-19	Potential impact: Low		
	Actual impact: Low		
	Audit history: Once		
	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	Controls are rated as moderate, as most submission data is accurate but there is some room for improvement.		ta is accurate but there is
	The impact is assessed to be low, and once corrected revised data will be submitted.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d and remedial action complete	May 2019	Identified
Action:			
11 ICPs with inactive usa	ge have been corrected		
In the case of the one read change, where the accepted read was not recorded and used for submission. This was due to human error of a new team member still in training. Training has been completed.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Existing process alerts of inactive usage when it hit 50 kwh since disconnection. Under review to reduce this alert threshold.		Aug 2019	
Reporting will be implem meters.	nented to identify non advancing	Dec 2019	

Forward estimate process			
Non-compliance	Description		
Audit Ref: 12.12	The accuracy threshold was not met for October 2017 for R3 and R7.		
With: Clause 6	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: Twice		
	Controls: Moderate		
From: Oct 2017	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to ensure data is within the accuracy threshold most of the time.		
	Initial data is replaced with revised da	ta and washed up).
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Response: Non compliance accepte	d		Identified
Action:			
Bosco will review the process to ensure code obligations are met at all times. The difference are very close to the threshold and are mainly caused by the RM profile shape			
Preventative actions taken to ensure no further issues will occur		Completion date	
Bosco will review the process to ensure code obligations are met at all times. The difference are very close to the threshold and are mainly caused by the RM profile shape		Dec 2019	

Historical estimate reporting to RM			
Non-compliance	Description		
Audit Ref: 13.3	Historic estimate thresholds were not met for one revision.		
With: Clause 10 of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: Three times		
	Controls: Moderate		
From: Sep 2018 (r3)	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls are rated as moderate because in most cases the thresholds were met, and processes are in place to make estimated readings permanent.		
	The audit risk rating is low, because Bosco were close to the target in all cases.		
Actions ta	Actions taken to resolve the issue Completion Remedial action status date		
Response: Non compliance accepte	d and remedial action on-going	Dec 2019	Identified
Action:			
	ocess to ensure code obligations are erence are very close to the threshold further.		
Preventative actions taken to ensure no further issues will occur		Completion date	
Bosco will review the process to ensure code obligations are met at all times. The difference are very close to the threshold however will investigate further.		Dec 2019	