

COMPLIANCE PLAN FOR ECOTRICITY - 2019

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 From: 01-Nov-18 To: 15-May-19	Incorrect information for a small number of ICPs Potential impact: Low Actual impact: None Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made. Both data sets are synchronised, the next step is to validate the correctness of data. The audit risk rating is low because there is no impact on the settlement outcome (small number of ICPs).		
Actions taken to resolve the issue		Completion date	Remedial action status
We have a robust ICP registry syncing system which has reduced substantially any ICPs which are out of sync.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The next improvement is daily checks from checks every three days.		1/5/2019	

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35 From: 01-Nov-18 To: 15-May-19	Meter Reading Frequency report not sent to the Authority; incorrect submissions for SVL0331 Potential impact: Low Actual impact: None Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made. The audit risk rating is low because there is no impact on the settlement outcome. Audit risk rating is low.		
Actions taken to resolve the issue	Completion date	Remedial action status	
A new internal report to supply meter frequency reports has been created which provides the correct data. In relation to the SVL0331 reporting issue, more pre-submission checks will be used to check before submissions are made,	1/5/2019	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
The new report will be run as required.	1/5/2019		

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Nov-18 To: 15-May-19	Late trader's updates to registry, delayed updates to ICPs "active" status Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. The new process of synchronising the registry information and ORION has decreased the number of late updates. Impact on settlement outcome is minor due to the low number of ICPs. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have a robust ICP registry syncing system which has reduced substantially any ICPs which are out of sync.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The next improvement is daily checks from checks every three days.		Pending	

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 01-Nov-18 To: 15-May-19	Incorrect ANZSIC code assigned to a small number of ICPs Potential impact: Low Actual impact: None 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 there are some improvements that can be made. More monitoring of the status of new connections is required. The audit risk rating is low because the impact on the settlement outcome is minor (small number of ICPs).		
Actions taken to resolve the issue		Completion date	Remedial action status
We have a robust ICP registry syncing system which has reduced substantially any ICPs which are out of sync.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Specific to ANZIC codes, we have added a new check with regards to sites whereby they are commercial sites on residential addresses for more than 12 months.		1/5/2019	

Non-compliance	Description		
Audit Ref: 3.7 With: 9(1)(f) of Schedule 11.1 From: 01-Nov-18 To: 15-May-19	Information for some UML/SUML not populated or incorrect Potential impact: Low Actual impact: None 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 there are some improvements that can be made. More monitoring of UML information in the registry is required. The audit risk rating is low because the impact on the settlement outcome is negligible (small number of ICPs with very low usage).		
Actions taken to resolve the issue		Completion date	Remedial action status
We have a robust ICP registry syncing system which has reduced substantially any ICPs which are out of sync.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
An issue was found by one network where we have inadvertently cleared SUML descriptions on the registry but which were re-instated subsequently.		Ongoing	

Non-compliance	Description		
Audit Ref: 3.8 With: 17 of Schedule 11.1 From: 01-Nov-18 To: 15-May-19	A number of ICPs have incorrectly assigned "inactive" status when they should be "active" Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because they require some adjustment to the process. Minor impact on settlement outcomes. Audit risk rating is low because a small number of ICPs are affected (details are in the EDA file)		
Actions taken to resolve the issue		Completion date	Remedial action status
We have a robust ICP registry syncing system which has reduced substantially any ICPs which are out of sync.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The next improvement is daily checks from checks every three days.		1/5/2019	

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 01-Nov-18 To: 15-May-19	CS file sent late by one day for 0000967181TU523 Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. Standard switch process is managed well. No impact on settlement outcome. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have strong controls for switching which will continue.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are looking to add more automated processes to avoid this happening again.		Ongoing	

Non-compliance	Description		
Audit Ref: 4.4 With: 6(1) of Schedule 11.3 From: 25-Jan-19 To: 08-Feb-19	ICP 1099575765CN6B2 did not switch on the same read Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. The losing trader refused to accept RR file. Impact on settlement outcome is minor. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have strong controls for switching which will continue.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are looking to further automate this process.		Ongoing	

Non-compliance	Description				
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 01-Nov-18 To: 15-May-19	6 switches were finalised late, for 2 switches the event date was not accepted and moved back by one day, 2 incorrect CS files Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2				
Audit risk rating	Rationale for audit risk rating				
Low	Controls are recorded as moderate. The process must be corrected, more training is required. Impact on settlement outcome is minor. Audit risk rating is recorded as low.				
Actions taken to resolve the issue	Completion date	Remedial action status			
More training and sharing of knowledge in the switching process. The team are completing switching correctly but a few errors have appeared which we are addressing.	Ongoing	Identified			
Preventative actions taken to ensure no further issues will occur	Completion date				
We are looking to further automate the process.	Ongoing				

Non-compliance	Description		
Audit Ref: 4.15 With: 6(1) of Schedule 11.3 From: 13-Aug-18 To: 29-Jan-19	For ICP 0000011210WEB4C NW was sent later than 2 calendar months after the event date of the switch 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 recorded as strong. Impact on settlement outcome is none, it was only one ICP. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls are strong, however a couple of lapses have occurred.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are looking to automate the process as time goes on.		Ongoing	

Non-compliance	Description		
Audit Ref: 6.9 With: 8(1(a)of Schedule 15.2 From: 01-Nov-18 To: 30-Apr-19	100% attainment was not achieved for more than 10 NSPs over 6 months Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because the process needs to be refined. Further, Ecotricity's business strategy is to replace legacy meters with smart meters after a switch is complete. Audit risk rating is low because of the small number of ICPs effected. ORION estimates data at the end of each month.		
Actions taken to resolve the issue		Completion date	Remedial action status
Improved processes and reporting on reads attainment for meters where we are unable to upgrade them.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Automation of call notes (action items) where reads are not received over a 6 month period.		Ongoing	

Non-compliance	Description		
Audit Ref: 6.10 With: 9(1)of Schedule 15.2 From: 01-Nov-18 To: 30-Apr-19	90% attainment was not achieved for more than 10 NSPs over 6 months Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because the process needs to be refined. Further, Ecotricity's business strategy is to replace legacy meters with smart meters after a switch is complete. Audit risk rating is low because of the small number of ICPs effected. ORION estimates data at the end of each month.		
Actions taken to resolve the issue		Completion date	Remedial action status
Improved processes and reporting on reads attainment for meters where we are unable to upgrade them. Note, there is a small number of ICPs where multiple attempts have been made to get reads, but due to access or the meter reader not being able to find the meter this has physically not been possible.		Ongoing.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Automation of call notes (action items) where reads are not received over a 6 month period.		Ongoing.	

Non-compliance	Description		
Audit Ref: 9.6 With: 17 of Schedule 15.2 From: 01-Nov-18 To: 30-May-19	HHR data is not checked for unexpected 0 values Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate; they do not cover all requirements of this clause e.g. "unexpected 0 values". Low risk rating is assigned due to a minor impact on settlement outcomes because data is highly scrutinized during billing run		
Actions taken to resolve the issue		Completion date	Remedial action status
There are number of situations where Ecotricity expects to get zero reads, for instance from solar generation at night. We are monitoring the situation by checking the data quality from MEPS.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will be introducing rules to support automatic checking of zero reads over the next 6 months.		To be confirmed	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Nov-18 To: 31-May-19	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Ecotricity submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have made major improvements on GXP synchronisation with the registry and the resulting substantial drop in missing ICP days.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This process is being automated in the medium term.		In progress	

Non-compliance	Description				
Audit Ref: 12.3 With: 15.5 From: 01-Nov-18 To: 31-May-19	Volumes for ICPs were submitted against different NSPs than that which was recorded in the registry 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 recorded as moderate, the current process of synchronising the registry data and ORION needs to be run more often. Minor impact on settlement outcomes is noted due to the same balancing area. Audit risk rating recorded as low.				
Actions taken to resolve the issue	Completion date	Remedial action status			
We have made major improvements on GXP synchronisation with the registry and the resulting substantial drop in missing ICP days.	1/5/2019	Identified			
Preventative actions taken to ensure no further issues will occur	Completion date				
This process is being automated in the medium term.	In progress.				

Non-compliance	Description		
Audit Ref: 12.7 With: 15.12 From: 01-Jan-19 To: 15-May-19	Incorrect submissions for SVL0331 for two months Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as weak, there is no robust process in place to monitor submission volumes. Feb'19 volumes were rectified by a washup file but not Dember'18 . Ecotricity notified RM about the problem so proactive action was taken. Our concern is that the issue was not rectified before the files were submitted to the market. This issue affected two months therefore we recorded audit risk rating as medium. 0.4 GWh not a significant volume but unless the controls are improved upon this could result in more severe incorrect submissions.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pre-checking submissions per GXP for consistency with previous submissions.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Automation of GXP consistency reporting during the month.		In progress	

Non-compliance	Description		
Audit Ref: 12.8 With: 4 of Schedule 15.2 From: 01-Apr-19 To: 31-May-19	Permanence of meter reading for the period Jan'18 to Feb'18 not achieved Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because there are some improvements that can be made to them. Ecotricity trades a small number of NHH ICPs for which metering is changed to HHR as soon as possible. The audit risk rating is low because the impact on the settlement outcome is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Reporting process has been updated to ensure rev14 reads are permanent.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting process has been updated to ensure rev14 reads are permanent.		1/5/2019	

Non-compliance	Description		
Audit Ref: 12.11 With: 4 of Schedule 15.3 From: 01-Nov-18 To: 15-May-19	Incorrect calculation of historical estimates for two scenarios conducted by ORION Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because there are some improvements that can be made to them. It is an on-going problem with ORION, the same non-compliant calculations. Audit risk is recorded as low as impact on settlement outcomes is minor		
Actions taken to resolve the issue		Completion date	Remedial action status
We note the issue and changed our process to capture this as an issue.		1/5/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are looking to automate the process in future.		Ongoing	

Non-compliance	Description		
Audit Ref: 13.3 With: 10 of Schedule 15.3 From: 01-Nov-18 To: 15-May-19	Historical Estimate targets not met for revision 3, 7, and 14. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, the process in place is not satisfactory, it needs to be re-engineered. Audit risk rating is recorded as low because impact on settlement outcomes is minor		
Actions taken to resolve the issue		Completion date	Remedial action status
Improving process with regards to NHH estimates. We note there also needs to be actuals with some of these cases.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are looking to automate this process more.		Ongoing.	