

Compliance plan for Orange Services 2019

Non-compliance	Description	
Audit Ref: 4.7 With: 9 of schedule 11.3 From: 02-Aug-18 To: 10-Aug-18	Incorrect type of switch used for 4 ICPs 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. The company understands their mistake of using an incorrect type of switch. It was noted in their processes. The impact on settlement outcomes is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Yes, we understand we made the mistake by sending incorrect switch type "MI" instead of "TR", but all the other information was correct, and it doesn't affect the volumes and ICP days submitted by both retailers. And it doesn't affect customer's billing as well.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have only 1 template file for both "TR" switch and "MI" switch. We will separate these into 2 template files to prevent someone forgot to change the "switch type" in the template file.		

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of schedule 11.3 From: 12-Aug-18 To: 10-Aug-18	No AN file sent 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		
Low	The controls are recorded as moderate. The company understands their mistake of using an incorrect type of switch. It was noted in their processes. The impact on settlement outcomes is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Yes, we understand we missed the "AN" file and send "CS" file directly to other retailer, but the information was correct, and it doesn't affect the volumes and ICP days submitted by both retailers. And it doesn't affect customer's billing as well.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will revise our "MI" switch process. Add the step of "Sending AN file" after receiving the "NT".			

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7 From: 02-Aug-18 To: 10-Jun-19	Energy supplied is currently calculated by JC Consulting from the previous months Initial Network volumes Potential impact: None 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 because data is not coming from a billing system, however volumes submitted to networks are very accurate based on meter readings. There is no impact on settlement outcomes. Audit risk low.		
Actions taken to resolve the issue	Completion date	Remedial action status	
We checked the all the AV-120 files prepared by JC for every month, the figures are exactly same as we billed our customers the month prior to submission month.		Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
We will change our process to prepare the AV120 data. We will collect the data from our invoices and send to JC. Or get submission file from JC and check the figures if they are the same as we billed our customers before JC submit to RM.			