

Compliance plan for Stack Energy 2019

Non-compliance	Description	
Audit Ref: 1.11 With: 15.37A From: 04-May-19 To: 22-Jun-19	Audit report completed late Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The audit risk rating is recorded as low because the number of ICPs traded by Stack Energy is small therefore any impact to the market will be minor	
Actions taken to resolve the issue	Completion date	Remedial action status
Processed audit as soon as we realised audit submission date is late.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Apply reconciliation audit before 2 months of expiry date. Dedicated managing people will be assigned and be aware of the Authority rules and follow to prevent market impact.	-	

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 From: 04-Jul-18 To: 31-May-19	Incorrect ANZSIC code assigned to 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	Controls are rated as moderate. Good quality data in the registry but truncation metering information effects market settlement. The audit risk rating is recorded as low because of small number residential ICPs traded.		
Actions taken to resolve the issue		Completion date	Remedial action status
ANZSIC code for ICP's with business have been updated manually by checking with customer.		20/06/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are going to check type of business to business customer once they apply our service.			

Non-compliance	Description	
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 04-Jul-18 To: 31-May-19	Two updates of the “active” status were later than 5 business days 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 rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only ICPs and updates that were delayed by a small number of days. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
All incorrect inactive status had already been updated.	31/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Dedicated managing person has been assigned for checking ICP status frequently (less than 5 days).	20/06/2019	

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From: 04-Jul-18 To: 31-May-19	One ICP had incorrect ANZSIC code 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 rated as strong. There was no impact on settlement because it was only one ICP, volumes submitted were not affected. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
ANZSIC code for ICP's with business have been updated manually by checking with customer.		20/06/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are going to check type of business to business customer once they apply our service.		20/06/2019	

Non-compliance	Description	
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 04-Jul-18 To: 31-May-19	Switch Move of one ICP was not finalised within 5 business days. The process documentation is incorrect. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak; the current process is open to human error. There was negligible impact on settlement because of the small number of ICPs. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Switching order had been updated	20/06/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
System development is going to develop automation system for switching and will be finished by end of 2019. During this period, we are going to monitoring registry webpage and SFTP notification manually in every day.	20/06/2019	

Non-compliance	Description	
Audit Ref: 4.10 With: 11 of Schedule 11.3 From: 02-Dec-18 To: 03-Dec-18	Incorrect switch event reading for two 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	Controls are rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only two ICPs. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Evaluate our switching system which update a correct meter reading data automatically once switch event is happened. Then eliminate human error.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Evaluate our switching system which update a correct meter reading data automatically once switch event is happened.		

Non-compliance	Description	
Audit Ref: 6.10 With: Audit Ref: 9(1) of Schedule 15.2 From: 04-Nov-18 To: 31-May-19	Meter Frequency Reports to the Authority were not provided to the Authority. The read attainment was not met. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as weak. The reports are created but not submitted. 90% read target was not reached because of a lack of understanding of relevant clauses. No impact on settlement outcomes. Audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Start sending the Meter Frequency Report to the Authority	01/07/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Find out the correct methodology of sending the Meter Frequency Report to the Authority and generate the report by following the Authority's rules.	01/07/2019	

Non-compliance	Description		
Audit Ref: 9.3 With: 3(5) of Schedule 15.2 From: 04-Jul-18 To: 31-May-19	Meter data in truncated when imported to Stack Energy's system. Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating:5		
Audit risk rating	Rationale for audit risk rating		
Low	Control are recorded as none because meter readings from MEPs are truncated, it was the company's understanding. Minor impact on settlement outcomes because of the small number of residential ICPs. Audit risk rating low		
Actions taken to resolve the issue		Completion date	Remedial action status
Change the Meter data system type which can allow to receive whole decimal place from MEPs.		19/06/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Change the Meter data system type which can allow to receive whole decimal place from MEPs.		19/06/2019	

Non-compliance	Description	
Audit Ref: 9.6 With: 17 of Schedule 15.2 From: 04-Jul-18 To: 31-May-19	NHH data is not fully validated. 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 rated as moderate because there are some improvements that can be made to them. There was minor impact on settlement because of the small number of ICPs. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will create a condition that once we receive meter reading data which is abnormal (much higher than average consumption and updating a reading value with error code from MEPs) conditions our system will notice to staff who is involved. We will carry out meter reading validation manually once we receive the notification.	31/12/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Create condition that once we receive meter reading data which is abnormal (much higher than average consumption and updating a reading value with error code from MEPs) condition our system will notice to staff who is involved. We will carry out meter reading validation manually once we receive the notification.	31/12/2019	

Non-compliance	Description		
Audit Ref: 12.3 With: 15.5 From: 04-Jul-18 To: 31-May-19	ICP 0000141237UN08A is reconciled against incorrect NSP 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 rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only 1 ICP. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We changed and corrected the NSP data for ICP 0000141237UN08A		19/06/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reconciliation report data will be reviewed every month for further validation process.			

Non-compliance	Description	
Audit Ref: 13.3 With: 10 of Schedule 15.3 From: 01-Aug-18 To: 31-Jan-19	Historical Estimates targets not met for revision 3, 7 for a few months 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 rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only one NSP and the number of traded ICPs is small. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will create a process for Stack Energy, as a reconciliation participant, to manually read non-AMI meters.	20/06/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Create a spreadsheet which can manage a meter reading data for non-AMI meter. Also, we will request MEP to upgrade form legacy meter to AMI meter for gaining actual meter reading.		