

Compliance plan for Contact Energy Reconciliation Participant – 2019

| Relevant information | | |
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| Non-compliance | Description | |
| Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 01-Jul-18 To: 17-Apr-19 | Some incorrect registry information. 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 rated as moderate catching most discrepancies, but improvement opportunities have been identified. And as reported in previous audits there are some delays in resolving these in some instances. The audit risk rating is low, because the impact on submission information and other participants is minor. | |
| Actions taken to resolve the issue | | Completion date |
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| | | Remedial action status |
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| <p><u>Active date variance with Initial Energisation date</u></p> <p>Contact is in the process of revamping their reporting to ensure all probabilities of a date variance between Active status event, IED, and certification dates are recognised.</p> <p>The frequency of the monitoring of the Active date variance reporting, and investigating/correcting mismatches identified will occur more frequently to improve the accuracy and timings related Contact’s new connection events.</p> <p><u>ANZSIC code discrepancies</u></p> <p>Contact has raised a system enhancement (through its Continuous Improvement Programme (see at the end of this document)) to purge the ‘T9’ series ANZSIC codes from the contract creation/change process within SAP CRM, to prevent the ‘T9’ series ANZSIC codes being applied as part of the switch gain and move-in process documents.</p> <p>Contact also monitors ANZSIC code discrepancies between the customers’ contracted end use and the Electricity Registry on a monthly basis which are being corrected via a manual correction process.</p> <p><u>Active ICP with no MEP and unmetered flag set to “N”</u></p> <p>Contact has increased the priority in our Business Process Exception Management System for exceptions raised relating to rejected MN responses to warrant the exceptions being worked on a more frequent basis (daily).</p> <p>Contact will also provide additional training to back office staff to pad gaps in their internal processes for cases where metering is physically removed from site due to a physical disconnection, where an inactive status has not been applied in SAP ISU or the Electricity Registry.</p> <p><u>UNM non-compliances</u></p> <p>Contact are in the process of widening the scope of existing UNM monitoring to further increase the accuracy of UNM data loaded in the Electricity Registry.</p> <p>Contact has raised a system enhancement (through its Continuous Improvement Programme of work) to fix known defects that cause inaccuracies in UNM data populated in the Electricity Registry.</p> <p><u>Submission against the RPS profile where the Registry has a controlled profile</u></p> <p>Since the last RPS Audit we have worked hard to improve our interactions with MEPs on accurate LCD flag population and we have made good progress with getting the registry to correctly reflect the certification status of the relay and hence the controlled profile associated. We are continuing our efforts working this the MEPs as the cost to traders, such as Contact, of having to submit controlled load as RPS is significant and we believe also has the ability to distort the accurate application of UFE to all traders. <u>Active ICPs with invalid NHH and/or HHR profiles recorded on the Registry</u></p> | <p>In progress</p> | <p>Identified</p> |
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| <p>Prior to the audit Contact had identified a system issue where the profile codes for registers of an AMI meter (NHH and HHR) were being included in our registry updates irrespective of the settlement methodology assigned to the ICP in our settlement system. We have implemented regular manual reporting and correction of these while we investigate the root cause of this issue / defect.</p> <p><u>Incorrect generation profiles recorded on the Registry</u></p> <p>Contact are in the process of updating their internal processes to align with Code requirements previously misinterpreted, which the auditors provided clarification on during the audit. The intended enhancements to internal processes will ensure the appropriate remedial action is being taken internally and externally to resolve non-compliances identified.</p> <p><u>Arc category 2 meters submitted as HHR</u></p> <p>Contact has been actively working with Arc to resolve this issue and we had believed we had quarantined these affected ICPs from HHR settlement as part of our investigations. However it appears that as new ICPs switched to Contact these new Cat 2 ICPs were not added to the quarantine list. We have now corrected the settlement methodology for these affected ICPs which will flow through to the scheduled submission wash ups. We have also updated our quarantine list with these additional ICPs</p> <p><u>Incorrect status recorded on the registry</u></p> <p>Contact has raised a system enhancement (through its Continuous Improvement Programme (see at the end of this document)) to change the logic behind how SAP handles ICPs switching to Contact in an Inactive state, resulting in the correct status event data being loaded in the Electricity Registry from our switch gain date.</p> <p>Contact is in the process of updating the methodology behind how status (connection) mismatches are allocated within the back office teams by creating an allocation matrix that identifies on a monthly/weekly basis the resource/time required to reduce historical, and clear new status exceptions identified.</p> | | |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |
| <p>Contact acknowledges the non-compliances identified by the auditors, and the underlying factors causing these. We are implementing new reports, as well as enhancing existing reporting, to increase visibility of non-compliances previously unidentified, and to assist in pinpointing further shortcomings in our internal processes and systems.</p> <p>Contact continues to examine all shortcomings realised, and explore improvements to internal reporting, processes, and systems to further decrease the opportunity for non-compliances to arise.</p> | <p>Ongoing</p> | |

| Audit trails | | | |
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| Non-compliance | Description | | |
| <p>Audit Ref: 2.4</p> <p>With: Clause 21 Schedule 15.2</p> <p>From: 01-Jun-18</p> <p>To: 29-May-19</p> | <p>EDMI's IE2 and DQM audit trails do not record the operator identifier for the person who completed the activity; operator identifiers correspond to a user group not an individual.</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> | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | <p>The controls are rated as strong and the impact as low.</p> <p>Audit trails are available and contain the required information, but the person who processed the change is not identifiable within the audit trail because there is only one operator identifier.</p> <p>A small number of users have access. For the sample of audit trails reviewed, the person responsible for processing the change was identified through supporting information in Fresh Desk.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| <p>Contact is in the process of establishing a monthly operational meeting between EDM I Data Administrator and Contact's HDM teams to discuss all business as usual operational issues. The first meeting will be held in August 2019.</p> <p>All relevant Electricity Authority RPS audit non compliances have been listed as separate agenda items to ensure corrective actions identified and implemented, whether systems, people or process related. This includes the exploration of all available avenues available to Contact to ensure these issues are resolved.</p> <p>Meeting minutes will be documented and published and all outstanding actions be followed up and resolved.</p> <p>First meeting to be held by 30/9/2019.</p> | | Ongoing | Investigating |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Ensure EDM I and FCLM have implemented a preventative process going forward to avoid this issue re-occurring. | | 31/3/2020 | |

| Connection of an ICP | | |
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| Non-compliance | Description | |
| Audit Ref: 2.9 With: Clause 10.32 From: 01-Aug-18 To: 31-May-19 | No arrangement in place with Intellihub. Potential impact: None Actual impact: Low Audit history: Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | Contact has robust controls in place and are progressing getting an arrangement in place for Intellihub. The audit risk rating is low as the lack of an arrangement with Intellihub had no impact on reconciliation or customers getting connected. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Contact has received a draft Variation Agreement from Intellihub in terms of which all IHUB ICPs are to be included under the current Metrix (now renamed to Intellihub Limited) Agreement. On signature by Contact of the Variation Agreement, the action for this will have closed. | 30 September 2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | As above | |

| Metering certification | | |
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| Non-compliance | Description | |
| Audit Ref: 2.11 With: Clause 10.33A From: 01-Jul-18 To: 17-Apr-19 | Two ICPs were not certified within five business days of becoming active. 74 ICPs were reconnected without having metering certification in place. 45 ICPs were not recertified on unbridging. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The overall controls are rated as moderate as but I note that the controls are not in place to ensure reconnected ICPs with uncertified metering are certified within five business days, and that meters are recertified on unbridging. The audit risk rating is low as this has no direct impact on reconciliation. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |

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| <p>ICPs not certified within five business days of becoming active</p> <p>Contact has had a number of discussions with the MEP's concerned and is also working with its ATH and Field Service Providers to ensure that ICP's are certified within 5 business days of the ICP being Livened</p> <p>ICPs were reconnected without having metering certification in place</p> <p>The scenario of reconnecting metering installations with previous interim certification is more complex than a simple case of not arranging for a MEP to certify the metering installation post reconnection.</p> <p>For the majority of ICPs identified by the auditor, Contact and the respective MEP have made multiple attempts to install compliant metering over the past number of years. There have been various reasons why this effort has been unsuccessful such as access issues, proximity of gas metering, wiring / switchboard issues, asbestos present.</p> <p>Where a customer requests a reconnection, Contact has a responsibility to complete this request as efficiently as possible and cannot delay this task in order to negotiate meter access or arrange metering certification to also occur at the same time.</p> <p>Contact is investigating an appropriate process to inform MEP whenever an interim certified ICP has been reconnected and to also request another attempt to certify this metering installation by the MEP</p> | Ongoing | Investigating |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |
| <p>Contact is currently reviewing its current processes to ensure that its reporting identifies each sites certification upon connection, reconnection and switch in. Upon identification we will work with all the relevant MEP's to ensure compliance.</p> <p>Where the reporting does not identify all sites, we will update processes to ensure these are included.</p> | TBA | |

| Arrangements for metering equipment provision | | |
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| Non-compliance | Description | |
| Audit Ref: 2.13 With: Clause 10.36 From: 08-Aug-18 To: 31-May-19 | No arrangement in place with Intellihub Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as strong as there is an arrangement in place with all MEPs except in Intellihub and this is in the process of being addressed. The audit risk rating is low as only 45 ICPs have an Intellihub meter that is being read manually. | |
| Actions taken to resolve the issue | | Completion date |
| Contact has received a draft Variation Agreement from Intellihub in terms of which all IHUB ICPs are to be included under the current Metrix (now renamed to Intellihub Limited) Agreement. On signature by Contact of the Variation Agreement, the action for this will have closed. | | 30 September 2019 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| As above | | As above |
| Remedial action status | | |
| Identified | | |

| Changes to registry | | |
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| Non-compliance | Description | |
| Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 27-Dec-18 To: 17-Apr-19 | Registry information not provided within 5 business days of change. Potential impact: Medium 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 rated as moderate as Contact has good controls to manage registry accuracy but there is room for improvement. Overall the level of compliance is high with the majority of updates being completed within five business days of the event therefore the audit risk rating is low. | |
| Actions taken to resolve the issue | | Completion date |
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| <p><u>Status Updates – reconnections</u></p> <p>Contact has raised a system enhancement (through its Continuous Improvement Programme (see at the end of this document)) to change the logic behind how SAP handles ICPs switching to Contact in an Inactive state, resulting in the correct status event data being loaded in the Electricity Registry from our switch gain date.</p> <p>Contact are currently investigating into improvements around internal processes and reporting opportunities for reconnection service requests returned as already reconnected/completed.</p> <p>Contact is in the process of updating the methodology behind how we allocate status (connection) mismatches within our back office teams by creating an allocation matrix that identifies on a monthly/weekly basis the resource/time required to reduce historical, and clear new status event discrepancies identified.</p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> <p><u>Status updated – inactive for reasons other than ready for decommissioning</u></p> <p>Contact has raised a system enhancement (through its Continuous Improvement Programme (see at the end of this document)) to change the logic behind how SAP treats ICPs switching to Contact in an Inactive state, resulting in the correct status event data being loaded in the Registry from our switch gain date.</p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> <p><u>Status updated – inactive ready for decommissioning</u></p> <p>If Contact is made aware of the decommissioning of an ICP after the fact (without our involvement in the process), we will complete an investigation to ensure accuracy of the data provided to us. This can cause further delays to an already late registry notification. We are planning to discuss this with other participants to further decrease these types of non-compliances.</p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> <p><u>MEP nominations</u></p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> | <p>Ongoing</p> | <p>Identified</p> |
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| <p><u>Trader updates</u></p> <p>Contact will provide additional training to back office teams, in particular around our systems specifications, to ensure they are aware of the causes behind, and how to stop, trader event data being sent to the Registry in two separate files.</p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> <p>Contact continues to monitor Contacts event updates between SAP and the Electricity Registry via monthly Registry reporting to increase the accuracy of Registry data.</p> | | |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |
| <p>Contact acknowledges the non-compliances identified by the auditors, and the underlying factors causing the late notifications to the Registry. We are implementing new reports, as well as enhancing existing reporting, to increase visibility of non-compliances previously unidentified, and to assist in pinpointing further shortcomings in our internal processes and systems.</p> <p>Contact continues to examine all shortcomings realised, and explore improvements to internal reporting, processes, and systems to further decrease the opportunity for non-compliances to arise.</p> | <p>TBA</p> | |

| MEP nomination | | |
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| Non-compliance | Description | |
| <p>Audit Ref: 3.4 With: Clause 11.18 From: 27-Dec-18 To: 17-Apr-19</p> | <p>One incorrect MEP nomination not actioned to ensure that an MEP is recorded on the registry. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are rated as strong as the was only one ICP missed due to human error. The volumes for the affected ICP are being billed and submitted therefore the audit risk rating is low.</p> | |
| Actions taken to resolve the issue | | Completion date |
| As the Auditor has noted, we have strong control for this process. We will actively look in to any future MEP nomination rejections which should resolve non-compliance in this area moving forward. | | Ongoing |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Contact continuously monitors the MEP nomination exceptions to prevent this issue re-occurring. | | Ongoing |
| | | Identified |

| Provision of registry information | | |
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| Non-compliance | Description | |
| Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 27-Dec-18 To: 17-Apr-19 | 231 late changes to Active. Contact was not recorded as the responsible participant in the registry on the active date for 231 ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as weak as expected actions to monitor and manage new connections are not in place hence the decline in overall performance. The audit risk rating is low, because the impact on submission information is low. Late changes to Active can mean submission information is not provided at the earliest opportunity. Billing will also be delayed for some ICPs. | |
| Actions taken to resolve the issue | | Completion date |
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| | | Remedial action status |
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| <p><u>New Connections – NHH/HHR</u></p> <p>Contact is revamping their New Connection reporting to ensure all probabilities of a date variance between Active status event, IED, and certification dates are recognised. The frequency of the monitoring and resolving Active date variances, will occur more frequently, to improve the accuracy related our claiming event data. Contact have begun trailing a new report to improve our performance.</p> <p>Contact continues to monitor the timeliness around our new connection claiming process to ensure the timeliness of status and trader event data being loaded in the Registry meets regulatory obligations.</p> <p><u>Timeliness of status updates</u></p> <p>Contact continues to monitor the accuracy of status event data loaded in the Electricity Registry on a monthly basis. As a result we complete historical status event corrections in the Electricity Registry, resulting late status event updates. These corrections may exceed the regulatory requirements around timeliness of events, however we do feel the accuracy of Registry event data should take a precedence.</p> <p>Contact acknowledges that not all late status events are a result of correcting Registry data, and agrees that improvement is needed in the timeliness of status event updates. As a result we are in the process of updating our methodology behind how we allocate status (connection) mismatches identified within our back office teams by creating an allocation matrix that identifies on a monthly/weekly basis the resource/time required to reduce historical, and clear new status exceptions identified. We believe this matrix will assist in decreasing the amount our non-compliances in this area.</p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> <p><u>MEP nomination</u></p> <p>Contact continues to investigate issues related to paperwork delays and accuracy from the field. These instances are addressed via the contractor performance provisions within the respective agreements.</p> | <p>In progress</p> | <p>Identified</p> |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |

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| <p>Contact acknowledges the non-compliances identified by the auditors, and the underlying factors causing late or inaccurate notifications to the Electricity Registry. We are implementing new reports, as well as enhancing existing reporting, to increase visibility of non-compliances previously unidentified, and to assist in pinpointing further shortcomings in our internal processes and systems.</p> <p>Contact continues to examine all shortcomings realised, and explore improvements to internal reporting, processes, and systems to further decrease the opportunity for non-compliances to arise.</p> | Ongoing | |
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| ANZSIC codes | | |
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| Non-compliance | Description | |
| <p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 31-May-19</p> <p>To: 31-May-19</p> | <p>Some incorrect ANZSIC codes.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are rated as moderate but as identified above there is room for improvement which Contact are working to put in place.</p> <p>There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity's reporting accuracy, therefore the audit risk rating is low.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Contact has a system enhancement pending with our IT providers into eliminate the 'T9' series ANZSIC codes from being populated within our systems as part of a switch gain, to avoid these codes being applied in the future. We are awaiting prioritization of this enhancement.</p> <p>Contact has also implemented reporting and a process to identify all ICP's which has an ANZSIC code miss-match or a 'T9' series ANZSIC code applied at time of switch gain and these are being corrected via a manual correction process while we await the enhancement to be implemented. Contact uses its customer information and also the companies register to assist in identifying the correct ANZSIC code as part of its manual correction process rather than Google streetview due to the snapshot nature of the Google information. Contact is also extending our reporting to also review 'A1 to A100' ANZSIC codes for accuracy to ensure correct codes are being selected for ICPs</p> | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | Ongoing | |

| Unmetered load | | |
|--|---|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 31-May-19</p> <p>To: 31-May-19</p> | <p>Daily unmetered kWh values are incorrect for 184 ICPs on the registry (2 ICPs where Distributor has load and Contact has none + 179 BTS supplies still incorrectly recorded +3 ICPs with the incorrect load when compared to the Distributor's load).</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are rated as weak as the updates for unmetered load are not updating to the registry as expected causing a misalignment between the registry and SAP.</p> <p>The audit risk rating is low, because reconciliation is occurring correctly.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Contact applies the same process for both standard and shared unmetered load where we undertake monthly validations of distributor details with our unmetered load values used for submission. In addition, our SAP system generates an exception (BPEM) whenever a new ICP switches to Contact with the distributor's UNM details field populated or where for an existing ICP SAP detects a change in the distributors UNM details via a registry event update</p> <p>We have made steady progress reducing the volumes of exceptions however our systems failure to correctly reflect these changes on the registry does not accurately show these improvements. There were only 2 requiring correction and 2 ICPs where Contact needs to complete further investigation to the accuracy of our details.</p> <p>Additionally Contact has resolved its system limitation where corrections to unmetered load daily kWh values could only occur from the last billed read. Correction can now align with the date of the actual change in information.</p> <p>We have now implemented an additional weekly registry validation to identify and resolve any registry notification failures for unmetered load. The 184 ICPs identified by the auditor have been corrected on the registry.</p> <p>Contact is working with the DUML owner to correct this invalid transfer of DUML load from this EN ICP (0000041244WE13A) to its parent NSP (ICP 1001282126UN573). Once Contact has had conformation that the required DUML database updates have been made we will correct our submission data accordingly</p> | Ongoing | Identified |

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| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | Ongoing | |

| Active status | | |
|---|---|-------------------------------|
| Non-compliance | Description | |
| Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 27-Dec-18 To: 17-Apr-19 | Some incorrect Active dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as weak as date discrepancies are no longer being checked. The audit risk rating is low, because there is either no impact on submission information or a minor impact on submission information related to consumption being apportioned to the incorrect month as a result of incorrect start dates for a small number of ICPs. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| ICP 000055574NT568 – we have corrected both the registry and our settlement system with the correct active date. ICP 0000516098NRD53 – This ICP switched to Contact inactive while the property was being upgraded and now has metering reinstalled and livened from 27 May 2019. We have now correctly reflected the respective status on the registry. Contact has re-commenced the process to check the accuracy of first active dates against the initial electrical connection date and meter certification date which should reduce the number of these potential miss-matches in future. | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | Ongoing | |

| Inactive status | | | |
|---|--|-----------------|------------------------|
| Non-compliance | Description | | |
| <p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 03-Mar-16</p> <p>To: 17-Apr-19</p> | <p>ICPs 0000632467TP11F, 0000132680TE1E4, 0005018218RN3F0, 0000922323TUB0B, 0000381890TP1F4, and 0000339665TP9AE incorrectly show inactive status on the registry for periods when they were electrically connected.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | <p>Strong controls are in place for the identification and management of discrepancies and the historic issues regarding consumption on inactive ICPs are being worked through.</p> <p>There is an impact on the timeliness of settlement, but submission will occur during the revision cycles for all consumption, therefore the audit risk rating is low.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| <p>As auditor has noted, Contact has started looking at these as a priority and will continue to do so in the foreseeable future which will help in resolving this non-compliance.</p> <p>For the specific ICPs identified – we have updated our settlement system to ensure the consumption volumes for these periods is included in the next scheduled wash ups and we are attempting to update the registry for these historical status events where necessary.</p> <p>We are continuing to engage with other traders where we detect an ICP being reconnected prior to the switch date by these other traders in order improve the behaviour around this process between participants</p> | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As above | | Ongoing | |

| Losing trader response to switch request and event dates - standard switch | | | |
|---|--|-----------------|------------------------|
| Non-compliance | Description | | |
| <p>Audit Ref: 4.2</p> <p>With: Clause 3(a)(ii) of schedule 11.3</p> <p>From: 12-Feb-19</p> <p>To: 17-Apr-19</p> | <p>"MU" AN code incorrectly being sent.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | <p>The controls are rated as moderate as SAP assigns the AN code based on a hierarchy.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| <p>1002043437LCA89: Recent switch into CTCT and the metering was not set-up in our system when switch loss file received. Because there was no metering set-up in SAP, it automatically sent MU so this was more of a timing issue.</p> <p>0000504752DE035: Due to historic data issue with the unmetered flag in SAP, system had sent AN code as MU.</p> <p>Contact believes that there is a robust structure in place for the AN codes in SAP. The couple of issues found with 'MU' code being sent to registry were either due to timing or historic data issues which have now been addressed. Based on this, Contact believes that our controls are at the level of "strong" rather than "moderate".</p> | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As above | | Ongoing | |

| Losing trader must provide final information - standard switch | | |
|---|---|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 01-May-18</p> <p>To: 17-Apr-19</p> | <p>Eight late CS files.</p> <p>The average daily consumption calculation is not calculated from the read to read period.</p> <p>Incorrect average daily consumption of zero when ICPs switch in and out in a short period.</p> <p>Incorrect average daily consumption recorded in the CS file for ICP 0000570809UN7D0.</p> <p>Incorrect last read dates where a meter has been removed and reinstalled.</p> <p>One instance of the incorrect switch event meter read sent as an estimate for an AMI site.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are recorded as moderate as this audit found issues with the information SAP is populating into the CS file, indicating controls need review but will mitigate risk most of the time.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |

| | | |
|--|----------------|-------------------|
| <p>Eight late CS files</p> <p>2 X ICPs delayed due to Contact awaiting confirmation on status of TOU contracts with internal sales team. We are looking in to strengthen our C&I switch loss process to resolve this non-compliance for future switch losses.</p> <p>1 X ICPs is due to the other trader sending the NTTR late to CTCT. We have already improved our internal process so any late NTTR from an alt retailer can be picked up by Contact to avoid this non-compliance in future.</p> <p>The remaining 5 X ICPs are all due to technical issues that prevented us from sending the CS with correct data within the time frame, they were either due to no smart reads available for switch event date or metering data miss-match with registry and our system. Due to the technical nature of these issues, some of these delays are un-avoidable.</p> <p>The average daily consumption calculation is not calculated from the read to read period.</p> <p>Contact can confirm that a fix is in progress to recalculate the average daily consumption for the CS file. The delivery of this system fix is scheduled for approximately the end of this year. The authority has been consulted to validate our understanding of the requirements. Once the fix has been deployed in production, this issue will be resolved.</p> <p>Incorrect average daily consumption of zero when ICPs switch in and out in a short period.</p> <p>Contact can confirm that a fix is in progress to recalculate the average daily consumption for the CS file. The delivery of this system fix is scheduled for approximately the end of this year. The authority has been consulted to validate our understanding of the requirements. Once the fix has been deployed in production, this issue will be resolved</p> <p>Incorrect average daily consumption recorded in the CS file for ICP 0000570809UN7D0.</p> <p>Contact can confirm that a fix is in progress to recalculate the average daily consumption for the CS file. The delivery of this system fix is scheduled for approximately the end of this year. The authority has been consulted to validate our understanding of the requirements. Once the fix has been deployed in production, this issue will be resolved</p> <p>Incorrect last read dates where a meter has been removed and reinstalled.</p> <p>Resolved, a system fix was deployed on 24.07.2019.</p> <p>One instance of the incorrect switch event meter read sent as an estimate for an AMI site.</p> <p>Contact received intermittent AMI reads for this vacant ICP so no reading was available for the switch event date. However we did receive an AMI read for the day after. Our SAP system then interpolated an estimated switch read from the actual reads either side of the switch date. As the ICP was vacant, SAP assumed no / low consumption to occur resulting,</p> | <p>Ongoing</p> | <p>Identified</p> |
|--|----------------|-------------------|

| | | |
|---|------------------------|--|
| <p>in this case, in the switch read essentially being the same as the actual AMI read the day after the switch event date but flagged as estimated.</p> <p>In this case the gaining trader provided an alternative read for this switch which was accepted by Contact</p> <p>A defect notice has been raised to our ICT team to investigate/resolve and improve our estimation of switch reads between 2 actual reads</p> | | |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| <p>Contact ICT team is in process of developing the solution for incorrect daily consumption for some CS files.</p> <p>Solution for incorrect last read date have been already implemented resolving this non-compliance.</p> | Ongoing | |

| Retailers must use same reading - standard switch | | |
|---|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.</p> <p>From: 01-May-18</p> <p>To: 17-Apr-19</p> | <p>45 late RR files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are rated as strong with good visibility of ICPs requiring RRs.</p> <p>The impact on settlement is minor because the number of ICPs is low; therefore, the audit risk rating is low.</p> | |
| Actions taken to resolve the issue | | Completion date |
| <p>Contact is looking at some system enhancements/process to reduce the amount of late RR files sent. Once new process is in place, it should reduce the number of late RR files.</p> | | Ongoing |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| As above | | Ongoing |

| Gaining trader informs registry of switch request - switch move | | |
|--|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 4.7 With: Clause 9 of Schedule 11.3 From: 01-Feb-19 To: 01-Mar-19 | Incorrect switch type used for 2 DUML ICPs switching in. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as strong as the controls to determine the correct switch type are robust. The MI switch type is used so that Contact gains the customer for the correct contract start date. The audit risk rating is low as this has no impact on reconciliation. | |
| Actions taken to resolve the issue | | Completion date |
| Contact has investigated the 2 ICP examples identified by the auditor and our finding are provided below: 0008807417WMB53: Upon further investigation, GENE advised they closed the account on 31.01.2019 and requested us to send NTMI for 01.02.2019. 0001570020PC006: This ICP was for the same customer as above and was requested as TR switch with a backdated proposed switch date. Contact had to resubmit the switch as MI to get the site for the correct contract start date in order to submit this DUML load as HHR. Contact uses exemption 177 to be able to submit DUML load as HHR. We believe the switching process for Metering Installation Categories 1, 2 and 9 allows for the use of MI switch type where to settlement type will be HHR from the proposed switch date. | | Ongoing |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| As above | | Ongoing |
| Remedial action status | | |
| Disputed | | |

| Losing trader must provide final information - switch move | | |
|--|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 01-May-18 To: 17-Apr-19</p> | <p>One late CS file.</p> <p>The daily consumption calculation is not calculated from the read to read period.</p> <p>Incorrect daily consumption of zero when ICPs switch in and out in a short period.</p> <p>Incorrect last read dates for seven of ten examples checked.</p> <p>Two instances of the incorrect switch event meter read sent as an estimate for an AMI site.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are recorded as moderate as this audit found issues with the information SAP is populating into the CS file, indicating controls need review but will mitigate risk most of the time.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p> | |
| Actions taken to resolve the issue | | Completion date |
| | | |
| | | Remedial action status |
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|--|-------------------------------|------------|
| <p>1 late CS file. We were awaiting customer confirmation for that 1 X ICP. There has been process changes made in April 2019 to improve this process further. However, some of the scenarios may be unavoidable (i.e. metering issues, reading issues, data issues).</p> <p>The daily consumption calculation is not calculated from the read to read period. Contact can confirm that a fix is in progress to recalculate the average daily consumption for the CS file. The delivery of this system fix is scheduled for approximately the end of this year. The authority has been consulted to validate our understanding of the requirements. Once the fix has been deployed in production, this issue will be resolved</p> <p>Incorrect daily consumption of zero when ICPs switch in and out in a short period. Contact can confirm that a fix is in progress to recalculate the average daily consumption for the CS file. The delivery of this system fix is scheduled for approximately the end of this year. The authority has been consulted to validate our understanding of the requirements. Once the fix has been deployed in production, this issue will be resolved.</p> <p>Incorrect last read dates for seven of ten examples checked. Resolved, system fix was deployed on 24.07.2019.</p> <p>Two instances of the incorrect switch event meter read sent as an estimate for an AMI site. Contact received intermittent AMI reads for these vacant ICPs so no readings were available for the switch event date. However we did receive an AMI reads for the day after. Our SAP system then interpolated estimated switch reads from the actual reads either side of the switch date. As the ICP's were vacant, SAP assumed no / low consumption to occur resulting, in these cases, in the switch reads essentially being the same as the actual AMI reads the day after the switch event date but flagged as estimated.</p> <p>A defect notice has been raised to our ICT team to investigate and improve our estimation of switch reads between 2 actual reads</p> | Ongoing | Identified |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |
| <p>Contact ICT team is in process of developing the solution for incorrect daily consumption for some CS files.</p> <p>Solution for incorrect last read date has been already implemented resolving this non-compliance.</p> | Ongoing | |

| Gaining trader changes to switch meter reading - switch move | | |
|--|---|-------------------------------|
| Non-compliance | Description | |
| Audit Ref: 4.11 With: Clause 12 of Schedule 11.3 From: 01-May-18 To: 17-Apr-19 | 104 late RR files. 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 | The controls are rated as strong with good visibility of ICPs requiring RRs. The impact on settlement is minor because the number of ICPs is low; therefore, the audit risk rating is low. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Contact is looking at some system enhancements/process to reduce the amount of late RR files sent. Once new process is in place, it should reduce the number of late RR files. | Ongoing | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | Ongoing | |

| Losing trader provision of information - gaining trader switch | | |
|--|---|-----------------|
| Non-compliance | Description | |
| Audit Ref: 4.13 With: Clause 15 of Schedule 11.3 From: 11-Feb-19 To: 09-Apr-19 | "CO" AN code sent incorrectly. Potential impact: None Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as moderate as SAP assigns the AN code based on a hierarchy. The audit risk rating is low as this has no direct impact on reconciliation. | |
| Actions taken to resolve the issue | | Completion date |
| Processing error resulted in a contract still being open in our SRM system when the AN was sent to registry. We are reviewing this process to ensure these scenarios are managed on time and accurately in the future. | | Ongoing |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| As above | | Ongoing |
| Remedial action status | | |
| Investigating | | |

| Withdrawal of switch requests | | |
|--|---|-------------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 27-Dec-18</p> <p>To: 17-Apr-19</p> | <p>124 late NW files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are strong for the management of withdrawals. These are worked on a case by case basis.</p> <p>There was a minor impact on settlement due to the correction of consumption information. There was also a minor impact on the customer; therefore, the audit risk rating is low.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| As auditor has noted, most of these withdrawals were due to wrong premises which normally comes to light after billing has occurred, some may also involves lengthy complex investigations. We believe we have robust processes in place for withdrawals and some of these late withdrawals are unavoidable. | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | Ongoing | |

| Shared unmetered load | | |
|--|---|-----------------|
| Non-compliance | Description | |
| Audit Ref: 5.1 With: Clause 11.14 From: 01-Jul-18 To: 17-Apr-19 | One ICP with missing shared unmetered load due to a registry update failing. 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 | The controls are rated as strong because they mitigate risk to an acceptable level. The impact on settlement is minor, therefore the audit risk rating is low. | |
| Actions taken to resolve the issue | | Completion date |
| <p>ICP 0000036648CP82E has now been correctly updated in the registry.</p> <p>Contact applies the same process for both standard and shared unmetered load where we undertake monthly validations of distributor details with our unmetered load values used for submission. Additionally our SAP system generations an exception (BPEM) whenever a new ICP switches to Contact with the distributors UNM details field populated or where an existing ICP detects a change in the distributors UNM details</p> <p>We have made steady progress reducing the volumes of exceptions however our systems failure to correctly reflect these changes on the registry does not accurately show these improvements. There were only 2 requiring correction and 2 ICPs where Contact needs to complete further investigation to the accuracy of our details.</p> <p>Additionally Contact has resolved its system limitation where corrections to unmetered load daily kWh values could only occur from the last billed read. Correction can now align with the date of the actual change in information.</p> | | 22 May 2019 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| We have now implemented an additional registry validation to identify any registry notification failures for unmetered load | | 1 June 2019 |
| Cleared | | |

| Unmetered threshold | | |
|---|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 5.2 With: Clause 10.14 (2)(b) From: 02-Apr-18 To: 17-Apr-19 | One standard unmetered ICP has an estimated annual consumption over 6,000 kWh per annum. 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 | The controls are strong with regard to identifying and attempting to resolve the any ICPs with loads that exceed the allowable threshold. There is no suggestion that settlement is inaccurate, therefore the impact is considered minor and the audit risk rating is low. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Our customer has scheduled to amalgamate their UML streetlight load with their main metered switchboard so that all of their load is fully metered. Contact is awaiting final confirmation that this has been completed and the date this occurred. | July 2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| N/A | N/A | |

| Unmetered threshold exceeded | | |
|---|--|-------------------------------|
| Non-compliance | Description | |
| Audit Ref: 5.3 With: Clause 10.14 (5) From: 14-Jun-18 To: 17-Apr-19 | One standard unmetered ICP has estimated annual consumption over 6,000 kWh per annum and has not been resolved within 20 business days. 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 | The controls are strong with regard to identifying and attempting to resolve the issues associated any ICPs with unmetered loads are strong. In this instance they have not been able to be completed within 20 business days. There is no suggestion that settlement is inaccurate, therefore the impact is considered minor and the audit risk rating is low. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Our customer has scheduled to amalgamate their UML streetlight load with their main metered switchboard so that all of their load is fully metered. Contact is awaiting final confirmation that this has been completed and the date this occurred. | July 2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| N/A | N/A | |

| Distributed unmetered load | | |
|--|--|-------------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 5.4</p> <p>With: Clause 11 of schedule 15.3</p> <p>From: 01-Jun-18</p> <p>To: 17-Apr-19</p> | <p>The monthly database extracts used to derive submission from are provided as a snapshot and do not track changes at a daily basis as required by the code.</p> <p>Inaccurate submission information for several databases.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| High | <p>The controls in place mitigate risk most of the time, therefore the control rating is moderate.</p> <p>There is a major impact on settlement outcomes because there are examples of over submission and under submission; therefore, the audit risk rating is high.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Contact believes the difference between daily updated streetlight counts compared to a monthly snapshot is within a similar accuracy tolerance a physical metering installation of equivalent size has under the code however unmetered installations are not provided any accuracy tolerance in the calculation of consumption information.</p> <p>The additional effort and cost to comply with these clarified code requirements will ultimately result in increased costs and administration for the end consumer with minimal if any submission accuracy benefit.</p> <p>Contact Energy are investigating how we can be compliant with the new clarification of this rule – received on 28 June 2019. And we will update our DUML customers of this additional database accuracy requirement.</p> <p>We are looking at how we can ensure our customers have accurate databases that can provide report of this data complete with a daily breakdown and if the database providers have any existing reports that will help with this.</p> <p>We also need to look at how this can be done on a daily basis in our system. This will not be a quick change.</p> <p>We continue to work with our customers on their databases to ensure they are the most accurate and compliant that they can be.</p> | TBA | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |

| | | |
|--|-----|--|
| <p>We are working on a process, system enhancements and customer understanding</p> <p>Quarterly database checks are being conducted on each of our customers databases, We work closely with the customers to ensure they are as compliant as they can be.</p> | TBA | |
|--|-----|--|

| Electricity conveyed | | |
|---|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 6.1 With: Clause 10.13</p> <p>From: 09-Apr-18 To: 12-Oct-18</p> | <p>While meters were bridged, energy was not metered and quantified according to the code for 48 ICPs.</p> <p>ICPs 0000008616TE48C, 0000011195HREA1, 0000012341NT62C, 0000025072UN5D3, 0000036741HB1E7, and 0000038430HB33C have generation consumption submitted under the PV1 profile but only have RPS profile recorded on the registry.</p> <p>ICPs 0001186517MLCC3, 0002333286ALA6A, and 0004001818ALD5D only have PV1 profile recorded on the registry, but also have X flow registers.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>Controls are rated as moderate as they are sufficient to reduce the risk most of the time.</p> <p>The audit risk rating is low:</p> <ul style="list-style-type: none"> Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons. Corrections are usually processed as discussed in section 8.1. Correct profiles are applied for reconciliation submissions in most cases. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Bridged meters</p> <p>Contact has been working with our MEPs to reduce the incidence of bridging as can be seen by the reduction in the number of corrections undertaken over the last 12 months</p> <p>Various updates of registry data around profile codes</p> <p>These ICPs have now been corrected on the registry.</p> | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Contact is looking to add additional reporting around incorrect population of registry profile codes to ensure these are updated in a timely fashion | Ongoing | |

| Responsibility for metering at GIP | | |
|---|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 6.2 With: Clause 10.26 (6), (7) and (8) From: 01-Jun-18 To: 01-Jun-18 | Updated meter certification details were provided ten business days late for CYD2201CTCTG. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as strong because they are sufficient to ensure that most updates are made on time. The impact is low, because the late update was made within 30 business days and the meter was certified at all times. | |
| Actions taken to resolve the issue | | Completion date |
| Contact has followed this issue up with our MEP for CYD2201CTCTG. The issue was a one off event where the MEP's system to flag upcoming certification expiries requiring updates failed to alert the MEP of this pending expiry. This process has worked successfully since CYD2201CTCTG certification update was completed. | | Resolved |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Contact does not expect a reoccurrence of this issue. | | Resolved |
| | | Identified |

| Collection of information by certified reconciliation participant | | |
|--|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 6.5</p> <p>With: Clause 2 Schedule 15.2</p> <p>From: 01-Jun-18</p> <p>To: 29-May-19</p> | <p>FCLM does not usually provide a screen shot confirming time differences for meters which are manually read using MV90. If this information is not provided, EDM I is unable compare the system time to the meter time.</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> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as strong and the impact as low, because the issue only affects manual downloads for FCLM meters | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Contact is in the process of establishing a monthly operational meeting between EDM I Data Administrator and Contact's HDM team to discuss all business as usual operational issues. The first meeting will be held in September 2019.</p> <p>All relevant Electricity Authority RPS audit non compliances have been listed as separate agenda items to ensure corrective actions identified and implemented, whether systems, people or process related. This includes the exploration of all available avenues available to Contact to ensure these issues are resolved.</p> <p>Meeting minutes will be documented and published and all outstanding actions be followed up and resolved.</p> | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Ensure EDM I and FCLM have implemented a preventative process going forward to avoid this issue re-occurring. | 31/12/2019 | |

| NHH reading application | | |
|---|---|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Jul-18</p> <p>To: 27-Jun-19</p> | <p>Incorrect switch event meter reads sent.</p> <p>NHH meter readings not applied at 2400 on the day of the meter reading for NHH to HHR upgrades.</p> <p>Potential impact: None</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are recorded as moderate as this audit found issues with the information SAP is populating into the CS file, indicating controls need review but will mitigate risk most of the time.</p> <p>There is a minimal impact on other participants receiving a days consumption that is Contact's responsibility.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Incorrect switch event meter reads sent. A defect notice has been raised ICT team to investigate/resolve this system issue.</p> <p>NHH meter readings not applied at 2400 on the day of the meter reading for NHH to HHR upgrades.</p> <p>Contact energy's systems like other retailers and also the Registry apply meter installations and removals as at the beginning and end of a day – while this view may be appropriate for NHH settled ICPs it does not accurately reflect HH metering and interval data encompassing the true meter change dates and times.</p> <p>Contact approach to managing meter changes around NHH to HHR, while not fully compliant with the rules is what we believe is the most accurate way to ensure all consumption volumes are included in the settlement process.</p> <p>This non-compliance has no impact to other participants. Contact is willing to work with the authority and other participants to find a robust solution to meter changes that also result in settlement methodology changes that is compliant with the code.</p> | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As above | On going | |

| Interrogate meters once | | |
|--|--|------------------------|
| Non-compliance | Description | |
| Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 21-Sep-18 To: 15-Apr-19 | For at least ten ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | Controls are rated as weak as they are not sufficient to ensure the best endeavours requirement is met where the period of supply is less than nine months. The audit risk rating is low, as most of the ICPs without a read during the period of supply appear to have been supplied for a short period. | |
| Actions taken to resolve the issue | | Completion date |
| Contact is reviewing the current process to ensure we are working towards the definition of best endeavours. We acknowledge that we need to work on the consistency of our processes | | Ongoing |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Contact Energy will ensure that this process is run in the required time | | Ongoing |
| | | Investigating |

| Annual interrogation | | |
|--|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 06-Jan-17 To: 31-Mar-19</p> | <p>For two ICPs supplied for over 12 months, exceptional circumstances did not exist, and the best endeavours requirements were not met.</p> <p>Some report accuracy issues were identified, and Contact is developing a replacement report to resolve this.</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>Controls are rated as strong because the MRC process is usually sufficient to ensure that the best endeavours requirement is met within 12 months. Replacement meter read frequency reports are under development.</p> <p>The audit risk rating is low, a second communication method was not used to attempt to contact the customer because a telephone number was not recorded in SAP at the time they were scheduled to be contacted. The report accuracy issues do not have a direct impact on settlement.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Contact is reviewing the current process to ensure we are working towards the definition of best endeavours. We acknowledge that we need to work on the consistency of our processes | Ongoing | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Contact Energy will ensure that this process is run in the required time | Ongoing | |

| NHH meters 90% read rate | | | |
|---|--|------------------------|-------------------------------|
| Non-compliance | Description | | |
| Audit Ref: 6.10 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Dec-18 To: 31-Mar-19 | For at least eight ICPs supplied for over four months, exceptional circumstances did not exist, and the best endeavours requirements were not met. 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 rated as moderate because the MRC process will not always ensure that 90% of ICPs are read within four months. The audit risk rating is low, because the 90% threshold was met for a high proportion of NSPs. Overall read attainment is over 98% at four months for all five months reviewed. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The ICPs relate to 3 embedded networks (2 commercial buildings) with 9, 9 and 19 ICPs respectively – the low number of ICPs relating to the GXPs has resulted in low attainment levels. Contact is actively working with the embedded network owners to upgrade the metering to AMI to improve reading performance in the commercial embedded networks. | | TBA | Investigating |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Contact is reviewing their processes and making improvements where necessary. We will also ensure our processes are completed in a timely manner as required. | | TBA | |

| NHH correction | | |
|--|---|-------------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 8.1</p> <p>With: Clause 19(1) Schedule 15.2</p> <p>From: 01-Jan-18</p> <p>To: 27-Jun-19</p> | <p>A correction for inactive consumption for ICP 0000246174TP7F1 was not processed correctly resulting in 3775 kWh of inactive consumption being excluded from submissions. The correction will be updated.</p> <p>ICP 0002361613TPE7A was bridged from 31/08/18 to 10/09/18, and a correction has not been processed yet, Contact intends to correct this ICP before revision 14.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are assessed to be strong, as most corrections are processed as required. The impact is assessed to be low based on the description above. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>ICP 0000246174TP7F1 – Correction has been correctly applied to an active period.</p> <p>ICP 0002361613TPE7A - Correction has been correctly applied to an active period</p> | Resolved | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| <p>Contact has been steadily reducing its backlog of exceptions relating to inactive consumption. We expect to eliminate this backlog this year.</p> <p>Contact is continuing to monitor and manually correct consumption volumes for the affected period as these occur. Contact has been working with our MEPs to reduce the incidence of bridging as can be seen by the reduction in the number of corrections undertaken over the last 12 months</p> <p>Additionally Contact has an enhancement awaiting scheduling to apply a permanent estimate read where an actual read is not provided as part of a disconnection or reconnection service order. This enhancement is expected to significantly reduce the incidence of inactive consumption from occurring.</p> | Ongoing | |

| Electronic meter readings and estimated readings | | | |
|--|--|------------------------|-------------------------------|
| Non-compliance | Description | | |
| Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Jun-18 To: 29-May-19 | For EDMl's manual downloads, the meter event information is not imported into IE2 and is not reviewed and sent to the retailer. 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 rated as moderate, because in most cases meter event data is reviewed and provided to the participant if any events occur. The impact is assessed to be low, because event information is obtained and reviewed for most downloads. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Contact is in the process of establishing a monthly operational meeting between EDMl Data Administrator and Contact's HDM team to discuss all business as usual operational issues. The first meeting will be held in September 2019. All relevant Electricity Authority RPS audit non compliances have been listed as separate agenda items to ensure corrective actions identified and implemented, whether systems, people or process related. This includes the exploration of all available avenues available to Contact to ensure these issues are resolved. Meeting minutes will be documented and published and all outstanding actions be followed up and resolved. | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Ensure EDMl and FCLM have implemented a preventative process going forward to avoid this issue re-occurring. Establish process with FCML to identify root cause of why manual download is required. If a re-occurring issue ensure FCLM initiate a meter replacement or other action to permanently resolve issue. | | 31/03/2020 | |

| Buying and selling notifications | | |
|--|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 11.1 With: Clause 15.3</p> <p>From: 01-Jul-18 To: 30-Nov-18</p> | <p>Notifications are not provided where Contact began or ceased trading at an NSP using a profile other than HHR, RPS, UML, EG1, or PV1 for 30 combinations of NSP and profile. There is no facility to provide the profile when entering a trading notification on the reconciliation manager portal.</p> <p>Potential impact: None Actual impact: None Audit history: None</p> <p>Controls: Strong Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>It was not possible for Contact to create the required trading notifications using the reconciliation manager portal.</p> <p>There is no impact, the reconciliation manager's system recorded the profiles correctly.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>The ability to provide trader specific profile codes when submitting an updated trading notification to the RM was removed from the Trading Notification template (v1.7) in 2008 by the RM service provider at the time. As a consequence Contact ceased performing this check in our validation suite for submissions</p> <p>The format of this revised template was then adopted by the current RM service provider and this format is also incorporated into the RM portal.</p> <p>Contact is able to advise the RM in relation to the our use of Contact owned Profiles (such as E08) via our AV100 Profile shape submission file which lists there profile codes against specific NSPs where they are able to be traded. However Contact has granted other traders the ability to also use these profile codes. If Contact were to cease trading on a NSP for a Contact owned profile code but other traders are still trading on this profile code then if we notify the RM of our intention to cease trading, the RM will expect Contact to also amend its AV100 Profile shape file therefore impacting the other traders approved to use this profile code.</p> <p>We will work with the RM to find a suitable solution to achieve compliance with this code requirement.</p> | Ongoing | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |

| | | |
|---|----------------|--|
| <p>Contact has begun engaging with the RM to find a solution that will allow traders such as Contact to include trader specific profiles codes in our Trading Notification updates as there is no current mechanism either manual or automated to provide this information.</p> | <p>Ongoing</p> | |
|---|----------------|--|

| Calculation of ICP days | | | |
|--|---|-----------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 11.2 With: Clause 15.6 From: 01-Jun-18 To: 27-Jun-19 | AV110 data was temporarily not zeroed where Contact has previously submitted ICP days, but there are no ICP days reported in the current revision. ICP days were over reported at CAM0011 (June 2018), CGE0011 (July 2018), TKM0011 (August 2018), TPS0011 (July & August 2018), TWG0011 (June & July 2018) due to inactive settlement units not being created for some 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 rated as moderate because: <ul style="list-style-type: none"> • A zeroing process is in place for the AV110, and is now consistently being completed. • Workarounds are in place to identify and correct ICPs with missing or incorrect settlement units, but I found some of these issues had not been resolved by revision 7. Contact confirmed that a system fix was implemented in July. The impact is assessed to be low because: <ul style="list-style-type: none"> • A total of 92 days were over reported at KCA0011 (June-August 2018) and 60 days were over reported at WTS0011 (June 2018) because submissions were not zeroed. If other ICPs are still supplied at an NSP, ICP days will be reported for subsequent revisions correctly. • Workarounds are in place to identify and correct ICPs with missing or incorrect settlement units. A relatively small proportion of ICPs are affected, estimated to be approximately 1:1000. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The non zeroing of some initial ICP days records was due to human error relating to training a new user in the process and only occurred for a few months. This process has been reinitiated and has been performed where necessary for a number of months now. The issues around missing or incorrect settlement units were largely due to a defect that recalculated all settlement periods on receipt of a new event such as a replacement registry metering event. This meant that some mismatches appeared to not be resolved at 7 month wash up where in fact these were new exceptions. Workarounds were implemented while a system fix was developed and implemented which occurred in late July. | | 23 July 2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |

| | | |
|---|---------|--|
| Contact continues to monitor its ICP day's accuracy to ensure its submission data is as accurate as possible. | Ongoing | |
|---|---------|--|

| HHR aggregates file | | |
|--|---|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: Apr-18</p> <p>To: Mar-19</p> | <p>HHR aggregates file does not contain electricity supplied information.</p> <p>Data for ten ICPs was incorrectly included in some wash up files, and data for three ICPs was incorrectly excluded from some wash up files. Corrections have now been processed or are due to be processed for the affected ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The issue relating to content of the aggregates file is an error in the code, Contact is providing submission information as expected.</p> <p>ICPs may be incorrectly included in, or excluded from HHR submissions for several reasons:</p> <ul style="list-style-type: none"> • submission flags and/or profiles are not correctly set; and • statuses are not correctly recorded in SAP or the registry. <p>The impact of the missing volumes is low, they are largely timing differences as Contact is working through processing corrections for the affected ICPs.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>The issues around missing or incorrect settlement units impacting AV140 data were largely due to a defect that recalculated all settlement periods on receipt of a new event such as a replacement registry metering event.</p> <p>This meant that some mismatches appeared to not be resolved at 7 month wash up where in fact these were new exceptions. Workaround were implemented while a system fix was developed and implemented which occurred in late July.</p> <p>ICP 0278411762LC033 was a backdated switch gain to Contact completed 7 June 2019. Additionally an error in meter set up information from our HHR data collector further delayed the settlement set up for this ICP.</p> | July 2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |

| | | |
|--|---------|--|
| <p>Contact continues to monitor its HHR Aggregates accuracy to ensure its submission data is as accurate as possible.</p> <p>Additionally Contact will implement specific exception reporting around default settlement set ups applied due to errors in ICP / meter set ups so that these can be resolved in a timely manner prior to submission.</p> | Ongoing | |
|--|---------|--|

| Accuracy of submission information | | |
|---|---|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Jul-18</p> <p>To: 27-Jun-19</p> | <p>Some submission data was inaccurate and was not corrected at the next available opportunity for submission for ICPs 0000442007UN246, 1001150655CK434, 0000470070HB2B2 and 0278411762LC033.</p> <p>Some ICP days submissions contained some inaccurate information.</p> <p>Some NHH volumes submissions contained some invalid forward estimates.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| <p>Low</p> | <p>The controls are rated as moderate, as they are sufficient to ensure that most submission information is accurate.</p> <p>The impact on settlement is rated as low because corrections were made or are in progress to be made during the revision process, and system errors are in the process of being resolved.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |

| | | |
|---|--|-------------------|
| <p>ICP 0000246174TP7F1 – correction has now been made</p> <p>ICP 0000442007UN246 - volumes corrected - has been resolved</p> <p>ICP 001150655CK434 was bridged as at switch gain and remains disconnected – Contact has applied consumption volumes based on the daily average from the gaining CS file to ensure the market is not impacted.</p> <p>ICP 0000470070HB2B2 – volumes corrected - has been resolved</p> <p>ICP 0278411762LC033 issue has been resolved and will correct our submission volumes once the next scheduled wash up is undertaken</p> <p>Unmetered load – corrections have now been made.</p> <p>ICP 0000008718TEE13 – Daily kWh value updated and will correct our submission volumes once the next scheduled wash up is undertaken</p> <p>ICP days – the defect causing the majority of issues was resolved in late July and the data corrections have also been completed.</p> <p>NHH volumes - Contact has reduced its FE volumes at revision 14 by 90% over the last 2 years by targeting and resolving a number of system and process related issues as described in the auditor’s summary. Good progress has been made to date.</p> | <p>Resolved</p> <p>Resolved</p> <p>Resolved</p> <p>Resolved</p> <p>Resolved</p> <p>Resolved</p> <p>Resolved</p> <p>Resolved</p> <p>Ongoing</p> | <p>Identified</p> |
| <p>Preventative actions taken to ensure no further issues will occur</p> | <p>Completion date</p> | |
| <p>We are continuing to resolve these system and process issues with a dedicated team involving developers, system testers and users.</p> <p>Additionally Contact is reviewing when during a month it reads / bills business customers that have smart meters with a view to moving the target read date as close to month end as possible. Business load is quite sensitive to holiday seasons and in terms of irrigation – seasonal conditions, and our estimation routines struggle to recognise these periods. We expect this change will result in an improvement in our submission accuracy of between 0.5 and 1%</p> | <p>Ongoing</p> | |

| Permanence of meter readings | | | |
|---|--|-----------------|------------------------|
| Non-compliance | Description | | |
| <p>Audit Ref: 12.8</p> <p>With: Clause 4 Schedule 15.2</p> <p>From: 01-Nov-17</p> <p>To: 01-Jan-18</p> | <p>Some estimates were not replaced by revision 14.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | <p>The controls are rated as moderate, because there are processes in place to attain readings by revision 14 and enter permanent estimate readings. Contact has made good progress on resolving the issues relating to phantom meters and consumption record defects and is working on the other issues which are causing permanent estimates.</p> <p>The potential impact is rated as low. There was 386,047 kWh of forward estimate over three months and the impact is dependent on the accuracy of these estimates. There are sound estimation processes, therefore I have recorded the audit risk rating as low.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| <p>Contact has reduced its FE volumes at revision 14 by 90% over the last 2 years by targeting and resolving a number of system and process related issues as described in the auditor's summary. Good progress has been made to date.</p> <p>We are continuing to resolve these system and process issues with a dedicated team involving developers, system testers and users.</p> | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| <p>We are continuing to resolve these system and process issues with a dedicated team involving developers, system testers and users.</p> <p>Contact has recently transitioned to a new meter reader provider who operates their own long term no access / high priority read process in parallel to retailer's efforts. Once this change in provider has been completed we will start to utilise this additional provider process to increase our attainment levels.</p> | | Ongoing | |

| Forward estimate accuracy | | |
|---|--|-------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: Oct 17-Jan 18, Mar 18, May 18, Nov- Dec 18</p> | <p>The accuracy threshold was not met for all months and revisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | Controls are rated as strong, as they are sufficient to ensure compliance to an acceptable level. Initial data is replaced with revised data and washed up. | |
| Actions taken to resolve the issue | | Completion date |
| <p>Contacts overall submission accuracy is very good and where we have not been able to meet the accuracy thresholds the market impact is very low base on the consumption volumes involved</p> <p>NHH volumes - Contact has reduced its FE volumes at revision 14 by 90% over the last 2 years by targeting and resolving a number of system and process related issues as described in the auditor's summary. Good progress has been made to date and we are continuing to target long term no access properties via our high priority read process to further reduce / eliminate our FE volumes across the wash ups.</p> | | Ongoing |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| <p>Additionally Contact is reviewing when during a month it reads / bills business customers that have smart meters with a view to moving the target read date as close to month end as possible. Business load is quite sensitive to public holidays and in terms of irrigation – seasonal conditions, and our estimation routines struggle to recognise these periods. We expect this change will result in an improvement in our submission accuracy of between 0.5 and 1%</p> | | Awaiting prioritisation |
| Remedial action status | | |
| Identified | | |

| HE targets | | | |
|---|--|-------------------------|------------------------|
| Non-compliance | Description | | |
| <p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: Nov 17-Jan 18 (r14), Jun-Aug 18 (r7) and Sep-Nov 18 (r3)</p> | <p>Historic estimate thresholds were not met for some revisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | <p>The controls are rated as moderate because in most cases the thresholds were met, and processes are in place to make estimated readings permanent.</p> <p>The audit risk rating is low, because Contact were reasonably close to the target in all cases.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| <p>Contacts overall submission accuracy is very good and where we have not been able to meet the accuracy thresholds the market impact is very low base on the consumption volumes involved</p> <p>NHH volumes - Contact has reduced its FE volumes at revision 14 by 90% over the last 2 years by targeting and resolving a number of system and process related issues as described in the auditor's summary. Good progress has been made to date and we are continuing to target long term no access properties via our high priority read process to further reduce / eliminate our FE volumes across the wash ups.</p> | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| <p>Additionally Contact is reviewing when during a month it reads / bills business customers that have smart meters with a view to moving the target read date as close to month end as possible. Business load is quite sensitive to public holidays and in terms of irrigation – seasonal conditions, and our estimation routines struggle to recognise these periods. We expect this change will result in an improvement in our submission accuracy of between 0.5 and 1%</p> | | Awaiting prioritisation | |