

## Compliance plan for Genesis Energy

<b>Title: Relevant information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.1 With: Clause 15.2 From: 01-Aug-18 To: 19-Jul-19	Small number of registry discrepancies. Some late status updates and trader updates. Some corrections not conducted. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as moderate because the scope of this clause is broad, and most areas have moderate or strong controls. There is a minor impact on settlement for some discrepancies. For most of the profile discrepancies there is no impact on settlement, because the profiles used to generate reconciliation submissions are recorded correctly.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Genesis has identified the cause and are considering the reintroduction of the validation reporting to capture inactive consuming.	01/11/2019	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
Genesis has introduced internal control audits which identified the status issue. The internal audit recommendations are currently being actioned.	01/11/2019	

<b>Title: Electrical Connection of Point of Connection</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.11 With: Clause 10.32 From: 01-Mar-19 To: 19-Jun-19	<p><b>GENE</b></p> <p>120 reconnections were not certified within five business days.            ICP 0000014674UN2D6 was not recertified on unbridging.</p> <p><b>GEOL</b></p> <p>21 reconnections were not certified within five business days.            Potential impact: Medium            Actual impact: Low            Audit history: None            Controls: Moderate            Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
Low	<p>I've rated the controls as moderate because they are strong for new connections but there are no controls in place for ensuring certification occurs at the time of reconnection.</p> <p>Uncertified metering installations may be less accurate than certified metering installations, so there could be a minor impact on settlement. The audit risk rating is recorded as low.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Discussions to be held with MEP's involved to understand why re-certification has not occurred and whether there is anything Genesis as the retailer can do to assist with their obligation to re-certify.	01/10/2019	Investigating
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
Genesis will review it's bridged and vacant/credit re-connection process to include an advice to the MEP to arrange for, and provide any information needed, to perform re-certification.		

<b>Title: Changes to registry information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.3 With: Clause 10 of schedule 11.1  From: 01-Mar-19 To: 19-Jun-19	Some status and trader updates were not processed within five business days of the event on the Registry.  Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls in place are robust but I have rated them as moderate as the removal of the status validation for reconnections has weakened the controls.  The impact on settlement is minor because status discrepancies are identified at the time of submission where there is consumption on inactive ICPs and these are then remedied. The audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The change in process highlighted in the audit was a introduced to provide a better overall customer experience, but it was discovered after implementation that it created a gap where in some instances the registry advice of status change was missed. An interim process was immediately put in place to capture and rectify these instances to ensure correct data is supplied to the Registry. While this ensures correct data is populated, a consequence is the timing non-compliance. The capture of these exceptions is prior to settlements reducing any risk to the market.	In place	Investigating
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
The altered process is being reviewed to identify the change required to capture all status changes while maintaining the customer experience improvements gained. Whatever resolution is found will then need to be placed in our change programme.	01/03/2020	

<b>Title: Trader responsibility for an ICP</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.4 With: Clause 11.18 From: 01-Mar-19 To: 19-Jun-19	<b>GENE</b> 20 incorrect MEP nominations. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate because there is room for improvement with regard to the identification of incorrect nominations. Settlement and billing are still occurring because Genesis has the metering details recorded. The audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The 5 human error nominations will be reviewed to determine if anything system wise can be implemented to prevent reoccurrence. For the remaining 15, these are the result of an already known issue within Gentrack for which the current process is the most cost-effective solution. Timing of mass closure will be looked at to see if a more frequent running will add any value, but it should be remembered that at the time of the initial MEP nomination it was correct and it is only the request from another MEP for the second nomination that indicates it is no longer so.	31/10/2019	Investigating
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
Pending any refinements indicated above we see no further changes required.	n/a	

<b>Title: Provision of information to the registry manager</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.5 With: Clause 9 of schedule 11.1  From: 01-Mar-19 To: 19-Jun-19	Some late and incorrect status updates.  Potential impact: Medium Actual impact: Low  Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate because they are identified but resource is not sufficient to ensure ICPs are updated within the required time.  The audit risk rating is low as the volume of ICPs not updated within the required time will have only a minor effect on submission.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Reporting implemented to assist with visibility and meet timelines. Genesis settlement processes also ensure correct status prior to submissions.	In place	Investigating
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
New connection processes to be reviewed for GEOL to identify any cost effective systematic improvements possible.	01/04/2019	

<b>Title: ANZSIC codes</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 3.6 With: Clause 9(1)(k) of schedule 11.1  From: 24-Aug-18 To: 31-Aug-19	A small number of incorrect ANZSIC codes.  Potential impact: Low Actual impact: Low  Audit history: Multiple times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as strong as these are checked on customer sign up and changes are managed via trader updates as required. The low error rate indicates that these are managed well.</p> <p>There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity Authority's reporting accuracy, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis is comfortable with the level of controls in place for ANZSIC codes.		n/a	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
n/a		n/a	

Title: Changes to unmetered load			
Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Aug-18</p> <p>To: 28-Aug-19</p>	<p><b>GENE</b></p> <p>Missing unmetered details for one ICP.</p> <p>Ten ICPs had incorrect daily unmetered kWh, and were corrected during the audit.</p> <p><b>GEOL</b></p> <p>Five ICPs had unmetered load recorded in error, and corrected during the audit.</p> <p><b>GENH</b></p> <p>Missing unmetered details for one ICP.</p> <p>Potential impact: Medium</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		
<b>Low</b>	<p>Controls are generally strong in this area.</p> <p>The impact on settlement is minor, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrections were made during the audit process.		Completed	Identified

<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
Additional reporting has been introduced in the registry management process to validate uml.	Completed	

<b>Title: Management of "active" status</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.8 With: Clause 17 of schedule 11.1  From: 01-Mar-19 To: 16-Jun-19	<p><b>GENE</b> 25 (6+19) incorrect first active dates.</p> <p><b>GEOL</b> One incorrect first active date. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as weak as there is no validation between the first active date, the initial electrical connection and the meter certification dates to identify potential incorrect active dates.</p> <p>The audit risk rating is low as the volume of error found for the sample checked is small.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Requirement for validation of connection dates will be added to our change programme.	01/06/2020	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
As above	01/06/2020	

<b>Title: Management of “inactive” status</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.9 With: Clause 19 of schedule 11.1  From: 30-Jun-18 To: 30-Jun-19	<b>GENE</b> Some incorrect inactive statuses. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Medium</b>	The controls are rated as moderate because there is room for improvement with regard to the identification of incorrect statuses. Settlement is not occurring in some cases until the status is corrected, therefore the audit risk rating is medium.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Status update timeliness has been affected by staff attrition in more recent times. The importance of attending to ‘Inactive-new connection in process’ report will be highlighted to management, though audit checks indicate that the time in the new connection process is valid. Genesis will be conducting internal review of the vacant consuming and inactive consuming processing to determine effectiveness. Findings from these will drive any actions required. Genesis settlement processes also ensure correct status prior to submissions.	01/12/2019	Investigating
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
Any changes identified above will be implemented.	01/03/2020	



Title: Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
Audit Ref: 4.2 With: Clause 3 of schedule 11.3 From: 01-Mar-19 To: 19-Jun-19	<b>GEOL</b> Three incorrect AN codes sent. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as the hierarchy will work providing the ICP details are correct. The audit risk rating is low as the volume of errors were small and this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis is comfortable with the level of control and accuracy in AN process, particularly considering the almost redundant value of AN files in the current switching process. As these breaches are immaterial we suggest the risk rating should not contribute to the total.	n/a	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
n/a	n/a	

Title: Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 of schedule 11.3 From: 01-Jul-18 To: 19-Jun-19	The average daily consumption calculation is not calculated from the last read period. <b>GENE</b> Two of ten ICPs checked with incorrect last read labelled as actual but should have been sent as estimates. Two ICPs with last actual read not sent. One ICP sent with midnight read of the event date sent instead of the midnight read of the last day of supply. <b>GEOL</b> Five of ten ICPs checked with incorrect last read labelled as actual but should have been sent as estimates.

	<p>Two ICPs with the incorrect last actual read date recorded.</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>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are recorded as weak as the volume of errors found in the ICPs sample was high indicating that there are system issues that require investigation and correction.</p> <p>The audit risk rating is low as the incorrect reads are addressed via the RR process initiated by the gaining trader in most instances.</p>		
	<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
	<p>Average daily consumption: This discrepancy has arisen from the functional spec being written at a time when the last read period generally aligned with the last invoiced period. In today's environment where reads may be gathered multiple times a month (i.e. for Genesis this is daily) but not necessarily billed the last read period is now likely to be one day. Our logic means an average calculated over more than a single day and we feel no need to adjust this.</p> <p>We suggest risk rating should be adjusted to reflect the short coming of the functional spec.</p> <p>Customer force finals for switch event date: an education programme for staff in contact centre to reinforce that when they receive a request from a customer to close an account and a switch is already ready in progress, then no further action is required.</p> <p>Mis-labelling of reads / last actual read: Further investigation required to determine if errors are in fact systematic and parameters need to be altered, or whether they are human errors introduced in actioning exceptions from our automated process.</p>	01/10/2019	Investigating
	<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
	Any system or training issues identified from the above investigation	01/01/2020	

<b>Title: Retailers must use same reading - standard switch</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Aug-18</p> <p>To: 19-Jun-19</p>	<p><b>GENE</b></p> <p>27 late RR files.</p> <p><b>GEOL</b></p> <p>5 late RR files.</p> <p>2 late AC 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>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are strong because the process is sound and potentially incorrect readings are investigated as soon as possible.</p> <p>There is a minor impact on other traders and customers because rebilling has to occur. The audit risk rating is low.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p>Genesis sees no reason to alter the current RR process.</p> <p>Current industry practice is such that initial provision of a revised read occurs by email within the 4-month time frame and revised reads are agreed before creation of the RR files. At times this process may mean the RR files are not created within the 4-month window and as such will be identified by the switch breach report as 'late' when the dispute process did occur within code timeframes.</p> <p>As these breaches are immaterial we suggest the risk rating should not contribute to the total.</p>	n/a	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
n/a	n/a	

Title: 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-Mar-19 To: 09-Apr-19	<b>GENH</b> Incorrect switch type used for 5 category 2 ICPs. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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 Genesis 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	Remedial action status
Genesis see no need to change this process as it is accepted industry process to realise customer requirements. As such we suggest the risk rating should not contribute to the total.	n/a	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
n/a	n/a	

Title: Losing trader provides information - switch move	
Non-compliance	Description
Audit Ref: 4.8 With: Clause 10(1) of schedule 11.3 From: 01-Mar-19	<b>GENE</b> Incorrect AN response codes sent. <b>GEOL</b> Incorrect AN response codes sent. <b>GENH</b> One late AN file sent. Two late CS files sent. Potential impact: None Actual impact: None Audit history: Twice

To: 19-Jun-19	Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as strong as the hierarchy will work providing the ICP details are correct.  The audit risk rating is low as the volume of errors were small and this has no direct impact on reconciliation.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
AN files: refer 4.2 Late CS files: Will raise issue with GENH management to reinforce importance of timely processing of switch files. As these breaches are immaterial we suggest the risk rating should not contribute to the total.		n/a	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>		<b>Completion date</b>	
n/a		n/a	

<b>Title: Losing trader must provide final information - switch move</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 4.10 With: Clause 11 of schedule 11.3  From: 01-Aug-18 To: 19-Jun-19	<p>The average daily consumption calculation is not calculated from the read to read period.</p> <p><b>GENE</b></p> <p>Two of ten ICPs checked with incorrect last read labelled as actual but should have been sent as estimates.</p> <p>Two ICPs with last actual read labelled incorrectly.</p> <p>One ICP where the last read was sent as an actual for the switch event date.</p> <p><b>GEOL</b></p> <p>Eight ICPs sent with an incorrect average daily consumption (7 negative +1 &gt;200 kWh).</p> <p>Five of ten ICPs checked with incorrect last read labelled as actual but should have been sent as estimates.</p> <p>One ICP sent with an actual read incorrectly labelled as an estimate.</p> <p>One ICP with the incorrect last actual read date recorded.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3</p>

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak as the volume of errors found in the ICPs sample was high indicating that there are system issues that require investigation and correction.</p> <p>The audit risk rating is low as the incorrect reads are addressed via the RR process initiated by the gaining trader in most instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Refer 4.3		01/10/2019	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Refer 4.3		01/01/2020	

Title: Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
<p>Audit Ref: 4.11</p> <p>With: Clause 12 of schedule 11.3</p> <p>From: 01-Jul-18</p> <p>To: 19-Jun-19</p>	<p><b>GENE</b></p> <p>91 late RR files</p> <p><b>GEOL</b></p> <p>4 RR requested as an estimated read when the actual read for the correct event date was ignored.</p> <p>36 late RR files.</p> <p>1 late AC file.</p> <p><b>GENH</b></p> <p>2 late AC files.</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: 1</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>The controls are moderate as the controls will mitigate risk most of the time but there is still room for errors to occur.</p> <p>There is a minor impact on other traders and customers because rebilling has to occur. The audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Refer 4.4 other than for the 4 instances where actual read was overlooked. This will be taken up with GEOL management as appears to be a training issue.	n/a	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer 4.4.	n/a	

Title: Losing trader provision of information - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.13 With: Clause 15 of schedule 11.3  From: 01-Jul-18 To: 19-Jun-19	<b>GENH</b> 28 late AN files. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as the team have good visibility of workflow but are reliant on other parts of the business.  The audit risk rating is low as these they were only a few days late and had no impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
Considering the redundant nature of the AN files and the ability to withdraw switches if genuinely required, we will remove the requirement for account managers to authorise AN files.	01/10/2019	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
As above	n/a	

<b>Title: Gaining trader to advise the registry manager - gaining trader switch</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.14 With: Clause 16 of schedule 11.3  From: 01-Jul-18 To: 19-Jun-19	<b>GENH</b> 5 late CS files. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong as the team have good visibility of workflow but are reliant on other parts of the business.  The audit risk rating is low as these they were only a few days late and had no impact on settlement.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Nonperformance will be raised with GENH management.	01/10/2019	Investigating
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
Introduction of switch file breach reporting as such occurs for GENE and GEOL brands to assist with process maintenance..	01/10/2019	

<b>Title: Withdrawal of switch requests</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.15 With: Clause 17 & 18 of schedule 11.3	<b>GENE</b> 1 incorrect NW code issued. 9 late NW requests. 1 late AW response. 1 WC breach late completion of a switch withdrawal.  <b>GEOL</b> 14 late NW requests. 3 late AW responses.  <b>GENH</b> 1 late NW request. 1 late AW response. 1 WC breach late completion of a switch withdrawal.	



From: 01-Jul-18 To: 19-Jun-19	Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are recorded as strong as these are managed on a cases by case with good controls to ensure that content is accurate and timeliness reporting is in place. 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.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Current controls provide a strong foundation and the non-compliances are immaterial. Genesis sees no reason to change existing process.		n/a	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>		<b>Completion date</b>	
n/a		n/a	

<b>Title: Switch saving protection</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 4.17 With: clause 11.15AA to 11.15AB From: 13-Feb-19 To: 27-Jun-19	<b>GENE</b> Switch save protected customer attempt to persuade customer to remain with GENE. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>Low</b>	The controls are rated as moderate as the policy is in place, but the agent did not adhere to this and calls into question the controls in place to monitor this activity. The audit risk rating is low, this is unlikely to be a widespread issue.

Actions taken to resolve the issue	Completion date	Remedial action status
Both these instances are being handled via the breach process. Win back processes were altered at the time to remove chance of re-occurrence of the instances.  To avoid any possibility of double jeopardy the risk rating in these instances should not contribute towards the total.	March and July 2019	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
n/a	n/a	

Title: Unmetered threshold		
Non-compliance	Description	
Audit Ref: 5.2 With: Clause 10.14 (2)(b)  From: 01-Aug-18 To: 19-Jun-19	<b>GENE</b> 22 ICPs with unmetered load over 6,000 kWh per annum.  Potential impact: Medium Actual impact: Unknown Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as weak because the issues do not appear to have been resolved over an extended period.  The impact on settlement is unknown because the load has not been checked but submission is occurring. I have recorded the audit risk rating as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with parties involved to investigate each ICP to verify load attached.	Ongoing	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis investigate each ICP and best endeavours are made to quantify load attached. Genesis has approached the distributor and in most cases no information was able to be obtained.	Ongoing	

<b>Title: Unmetered threshold exceeded</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 5.3 With: Clause 10.14 (5) From: 01-Aug-17 To: 31-Jul-18	<b>GENE</b> Unmetered load over 6,000 kWh per annum and not resolved within the allowable timeframes. Potential impact: Medium Actual impact: Unknown Audit history: Multiple times Controls: Weak Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as weak because the issues do not appear to have been resolved over an extended period. The impact on settlement is unknown because the load has not been checked. I have recorded the audit risk rating as low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
See 5.2. This is instance where non-conformance measured at the sub clause (and even paragraph) level is creating over counting of risk rating.	Ongoing	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>	<b>Completion date</b>	
see 5.2	Ongoing	

<b>Title: Distributed unmetered load</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 5.4 With: Clause 11 Schedule 15.3 From: 01-Aug-18 To: 19-Jun-19	<b>GENE</b> 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. Inaccurate submission information for several databases. Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6

Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate as Genesis are working to resolve the databases not yet audited but as this is reliant on third parties co-operating this is proving challenging. For those databases audited corrections are being made where possible.</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>Genesis have been making good improvements on DUML data sets and in most cases, there has been a positive customer response. However historical issues still pose their challenges. Where it is possible Genesis have worked with the distributor to gain information on datasets, but it seems the Distributors also have similar information issues.</p>		01/09/2020	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Genesis continues to address the asset database issues of their contracted parties.</p>		01/09/2020	

Title: Electricity conveyed & notification by embedded generators	
Non-compliance	Description
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24 and 15.13</p>	<p><b>GENE</b></p> <p>ICP 0000024381CPF34 has generation installed but does not have an EG register installed, and notification of gifting has not been provided.</p> <p>Eight ICPs with solar generation indicated had EG1 profiles recorded on the registry. The correct profiles were applied for submission, and the incorrect profiles were updated during the audit.</p> <p>0001409185UNC41 and 1099576199CN15D have non-solar generation and had PV1 profile applied in Derive, Gentrack, and the Registry. Both ICPs were corrected to EG1 profile in the three systems during the audit.</p> <p>Ten ICPs were updated to PV1 profile in error on the registry, but the correct profiles were applied for submission. Seven have been corrected or switched out, and three remain incorrect.</p> <p>15 meters were bridged during the audit period. While meters are bridged energy is not quantified in accordance with the code.</p> <p><b>GEOL</b></p> <p>ICPs 0002201640WMA5B, 0002403021TUB30, 0007185413RNFD8, 0014669504EL546 and 0110004600EL6AB have generation installed but do not have an EG register installed, and notification of gifting has not been provided.</p> <p>Three meters were bridged during the audit period. While meters are bridged energy is not quantified in accordance with the code.</p> <p><b>GENH</b></p>

From: Aug-18 To: Aug-19	ICPs 0005876656RNF26 has generation installed but does not have an EG register installed, and notification of gifting has not been provided.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Twice		
	Controls: Moderate		
	Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are rated as moderate because improvements can be made with regard to remedial actions when DG is identified. Bridging should occur very rarely as 24-hour 7 day per week arrangements are in place for most soft reconnections. Bridging should only occur where communications do not allow remote reconnection and energy supply is urgently required for health and safety reasons.  The impact on settlement is minor therefore the audit risk rating is low.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Genesis have conducted internal process audit on Bridged Metering. The findings have been presented to the working group (09/09/2019) actions from the finding are likely to take place over the coming months.  Temporary reporting has been set in place to monitor current processes.		01/06/2020	Identified
<b>Preventative actions taken to ensure no further issue will occur</b>		<b>Completion date</b>	
Internal process audit regime measures the controls in place to mitigate the risk. The audit findings will be reviewed, with recommendations from the audit to be actioned.		01/06/2020	

<b>Title: Collection of information by certified reconciliation participant</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 6.5  With: Clause 2(4) of schedule 15.2  From: 11-Sep-18  To: 22-Jul-19	<b>GENH</b>  Four GENH meters not interrogated within the maximum interrogation cycle.  Potential impact: Medium  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</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>Issues were continuously raised with Broad Spectrum during the period to the point that Genesis was about to lodge breach when the EA investigation was advised. We have joined that investigation and await further action.</p> <p>As non-conformance is caused by another participant we feel risk rating should not contribute to total.</p>		Ongoing	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
n/a		n/a	

Title: Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 13-Jul-18</p> <p>To: 04-Mar-19</p>	<p><b>GENE</b></p> <p>At least one ICP with signs of tampering or damage, and one ICP with missing or broken seals identified by Wells were not investigated.</p> <p><b>GEOL</b></p> <p>At least one ICP with missing or broken seals identified by Wells was not investigated.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are considered moderate because they are not sufficient to ensure that all meter condition events identified by Wells are investigated and resolved.</p> <p>The impact is assessed to be low, based on the exceptions identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A review of current processes will take place through internal process audit.		01/03/2020	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
Genesis will review its process to look at the opportunity to gain enough exception reporting to minimise the risks associated with potential tampers/broken seals.	01/03/2020

Title: NHH meter reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 28-Oct-18 To: 07-Jun-19</p>	<p><b>GENE and GENH</b></p> <p>NHH meter readings not applied at 2400 on the day of the meter reading for NHH to HHR upgrades and downgrades where the meter is replaced.</p> <p><b>GENE</b></p> <p>For ICP 0039607000WR3C4 the CS file contained the midnight read for the event date, instead of the midnight read for the day before the event date.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as strong because the process achieves accuracy.</p> <p>There is no impact on settlement or other participants for upgrades and downgrades. There is a minor impact on the customer, other participants and settlement for the incorrectly applied switch event read.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis is currently reviewing the process involving switching read process to eliminate the minor impact.	01/11/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Changes identified from review will be implemented.	01/12/2020	

<b>Title: Interrogate meters once</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 20-Jan-02</p> <p>To: 19-May-19</p>	<p><b>GENE</b></p> <p>For at least nine ICPs unread during the period of supply, exceptional circumstances did not apply, and the best endeavours requirement was not met.</p> <p><b>GEOL</b></p> <p>For at least eight ICPs unread during the period of supply, exceptional circumstances did not apply, and the best endeavours requirement was not met.</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>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>Controls are moderate as they will ensure that most ICPs will receive a read during the period of supply. Some residual risk remains for ICPs with short periods of supply.</p> <p>The impact on billing and settlement is considered to be minor because a small number of ICPs are affected, and the period of supply is generally short.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The non-compliance is immaterial, and the controls are enough to meet the requirements. Genesis will establish gains where the period of supply is short. In most cases these sites are non-advanced metering or have non-communicating meters with bi-monthly read sequences.	01/06/2020	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Genesis makes attempts to read each site in majority of the cases the processes are suffice. Genesis will review these controls to establish completeness.	01/06/2020	



<b>Title: NHH meters interrogated annually</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-May-18</p> <p>To: 30-Apr-19</p>	<p><b>GENE</b></p> <p>For at least 14 ICPs unread in the 12 months ended April 2019, exceptional circumstances did not apply, and the best endeavours requirement was not met.</p> <p><b>GEOL</b></p> <p>For at least three ICPs unread in the 12 months ended April 2019, exceptional circumstances did not apply, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The issue relating to unmetered ICPs being included in the report has been cleared. Controls are rated as moderate because there is room to improve the processes for read attainment.</p> <p>The impact is low, because overall read attainment rates are reasonably high.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
The non-compliance is immaterial; however we will continue to work with staff to ensure process is followed (particularly account managed sites)	ongoing	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
n/a	n/a	

<b>Title: NHH meters 90% read rate</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 6.10</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Jan-19</p> <p>To: 30-Apr-19</p>	<p><b>GENE</b></p> <p>For at least 15 ICPs unread in the four months ended April 2019, exceptional circumstances did not apply, and the best endeavours requirement was not met.</p> <p><b>GEOL</b></p> <p>For at least ten ICPs unread in the four months ended April 2019, exceptional circumstances did not apply, and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p>	

	Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate because there is room to improve the processes for read attainment. The impact is low, because overall read attainment rates are reasonably high.	
	<b>Actions taken to resolve the issue</b>	<b>Completion date</b>
	The non-compliance is immaterial; however, we will continue to work with staff to ensure process for collecting a read is followed  We note that the distinction of NHH/HHR has changed with the advent of AMI metering from where it was a proxy for mass market/commercial. This clause is instance where Code has not kept up with change in industry and overall improvements in read attainment for mass market customers as a whole is not recognised.	Ongoing
	<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>
	n/a	n/a
		<b>Remedial action status</b>
		Investigating

<b>Title: Correction of NHH meter readings</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 8.1 With: Clause 19(1) Schedule 15.2  From: Mar 16 To: Aug 19	<b>GENE</b> Stopped meter corrections were not processed for 0037942216PC4D0 (November 2018) or 0000507493DEA7C (February 2019). A bridged meter correction was not processed for ICP 0000014674UN2D6, which was unbridged on 14/08/18. An inactive consumption correction was not processed for ICP 0100010811BC4DF, which switched out before the correction was processed.  <b>GEOL</b> For ICP 2810040000CH3A8 the multiplier correction was applied from 17/08/18 but should have been applied from 31/03/16.  Potential impact: Medium Actual impact: Unknown  Audit history: Multiple times Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as moderate overall for corrections, because most issues requiring correction are identified and corrections are processed. Corrections for consumption that has occurred during inactive periods is identified, but investigation and correction does not always occur.</p> <p>The impact is unknown but assessed to be low, based on the low number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will investigate the ICP's that have been identified and assess the scenarios surrounding their non-conformances.		01/12/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will assess the findings from the investigation and implement change where required.		01/03/2020	

Title: Identification of readings			
Non-compliance		Description	
<p>Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2</p> <p>From: 01-Aug-18 To: 19-Jun-19</p>	<p><b>GENE</b> Four CS files had estimated readings recorded as actual readings.</p> <p><b>GEOL</b> Ten CS files had estimated readings recorded as actual readings. One CS file had actual readings recorded as estimated readings.</p> <p>Potential impact: Medium Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak as the volume of errors found in the ICPs sample was high indicating that there are system issues that require investigation and correction.</p> <p>The audit risk rating is low as the incorrect reads are addressed via the RR process initiated by the gaining trader in most instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Refer 4.3 and 4.10.</p> <p>This is instance where risk rating is double counting for same cause.</p>			Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
Refer 4.3. and 4.10	

Title: Buying and selling notifications		
Non-compliance	Description	
Audit Ref: 11.1 With: Clause 15.3  From: 30-Jun-18 To: 20-Mar-19	<b>GENE</b> 14 trading notifications were not provided.  Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	It was not possible for Genesis to create the required trading notifications using the reconciliation manager portal. There is no impact, the reconciliation manager's system recorded the profiles correctly.	
Actions taken to resolve the issue	Completion date	Remedial action status
As this immaterial non-conformance is created by a shortcoming of the Reconciliation Manager portal the risk rating should not contribute to the total.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.3 With: Clause 15.7  From: 01-Sep-17 To: 31-Oct-17	<b>GENE and GENH</b> Billed data was double counted in the September and October 2017 r14 billed submissions for GENE and GENH.  Potential impact: None Actual impact: None Audit history: None Controls: Strong	

	Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are rated as strong, because the error occurred due to a manual processing error. The process has been corrected and the issue has not recurred. Billed submissions are validated prior to submission by checking them against previous billed submissions, and volumes submissions for reasonableness.</p> <p>There is no impact on the reconciliation process, and the difference has been investigated and explained. The data cannot be corrected because r14 has been completed for the affected periods.</p>		
	<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
	Genesis reviewed to information pertaining to the asbilled processes and found a duplication in asbilled invoice post migration of EOL into Genesis systems. Genesis has rectified this issue.	01/09/2019	Identified
	<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
	Asbilled submission information reporting was established to ensure future reporting met submission requirements.	01/09/2020	

<b>Title: HHR aggregates information provision to the reconciliation manager</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 11.4 With: Clause 15.8</p> <p>From: 01-Aug-18 To: 09-Aug-19</p>	<p><b>GENE and GENH</b> HHR aggregates files do not contain electricity supplied information.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The issue relating to content of the aggregates file is an error in the code, Genesis is providing submission information as expected.		
	<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
	Genesis confirms the auditor's findings	01/09/2019	Identified
	<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
	n/a	n/a	

<b>Title: Accuracy of submission information</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: Mar 16 To: Aug 19</p>	<p><b>GENE</b> PV1 profile was applied instead of EG1 for non solar generation for two ICPs. A small number of corrections had not been processed for inactive ICPs with consumption, stopped meters and bridged meters. The unmetered load for GENH ICPs 0000000516NTE49 and 0000275289HB0B4 is submitted with the GENE submission. One category 3 and two category 5 ICPs have NHH submission recorded. Issues with compensation factors or the flow direction being inconsistent with the ICP's loss factor prevent HHR submission being applied.</p> <p><b>GEOL</b> One multiplier correction was not processed from the correct date.</p> <p><b>GENH</b> The unmetered load for GENH ICPs 0000000516NTE49 and 0000275289HB0B4 is submitted with the GENE submission.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as moderate as they are sufficient to ensure that most submission information is correct, but there is some room for improvement. The impact is low based on the number and type of issued identified. Where possible, corrected information is expected to be provided through the revision process.</p>	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
<p>Refer individual sections above. This is instance where risk rating is double counting for same cause and should not contribute to total.</p>		
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
<p>Refer individual sections above</p>		
		<b>Remedial action status</b>
		Identified

<b>Title: Permanence of meter readings for reconciliation</b>			
<b>Non-compliance</b>		<b>Description</b>	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2  From: Dec 17 (r14), Jan 18 (r14) and Feb 18 (r14)		<b>GENE and GEOL</b> Some estimates were not replaced with permanent estimates by revision 14. Potential impact: Medium Actual impact: Unknown Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
<b>Audit risk rating</b>		<b>Rationale for audit risk rating</b>	
<b>Medium</b>		The controls are rated as moderate, because there is room for improvement in the read attainment processes which would reduce the quantity of forward estimate.  The audit risk rating is assessed to be medium. Total forward estimate across the three months reviewed was 2,979,344.18 kWh for GENE and 205,323.5 kWh for GEOL. The forward estimate may differ from the actual consumption for the affected ICPs.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This non-conformance is a natural consequence of meter integration difficulties addressed in sections 6.8 - 6.10 and thus contribute to a double counting of the risk rating. Improvements delivered in the above sections will be reflected in this clause.			Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
n/a			

<b>Title: Reconciliation participants to prepare information</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 12.9 With: Clause 2 Schedule 15.3  From: 01-Dec-16 To: 09-Aug-19	<b>GENE</b> One category 3 and two category 5 ICPs with NHH submission recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2

<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate because these issues were not identified and resolved prior to the audit. The impact on settlement is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
0001130018PSF65 will be escalated to MEP management for resolution		1/10/2019
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
<b>Remedial action status</b>		Investigating

<b>Title: Forward estimate process</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: GENE Jan 18 (r3, r7 & r14), Feb 18 (r14), Mar 18 (r14), May 18 (r7), Jun 18 (r7), Jul 18 (r7), Sep 18 (r7), Oct 18 (r3 & r7), Nov 18-Feb 18 (r3) GEOL Oct 18 (r3 & r7), Nov 17 (r3 & r7)	<b>GENE and GEOL</b> The accuracy threshold was not met for all months and revisions.  Potential impact: High Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as moderate, as there is room for improvement. Initial data is replaced with revised data and washed up. A small number of submissions had differences over the threshold.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Factors have not been considered when investigating these percentage variances. Genesis convert NHH to HHR after the criteria has been met. This can mean that the initial submission was <b>NHH</b> for any given advanced metered site. Upon the revision of that period the possibility of site being converted to HHR from NHH is very real. Thus, exposing the balancing area to greater submission variances between revisions.  As mentioned above this is another example where Code is failing to keep pace with change in industry.		01/04/2020
<b>Remedial action status</b>		Investigating



<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Genesis will initiate further controls to identify and correct real volume movement between revisions.	01/04/2020	

<b>Title: Historical estimate reporting to RM</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3  From: Dec 17 - Jan 18 (r14), Jul 18 - Oct 18 (r7) and Nov 18 - Jan 19 (r3)	<b>GENE and GEOL</b> Historic estimate thresholds were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
Low	The controls are rated as moderate because some improvements can be made to ensure compliance. GENE and GEOL were reasonably close to the target in all cases. The impact is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
As above, further example of code not keeping pace with change – in this instance review of only AV080 means percentage is not being calculated across all traditional NHH ICPs of NSP.  There is also an element of double counting of risk rating (with 6.8 -6.10).		Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	