

Compliance plan for WEL and OurPower – 2019

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Oct-18</p> <p>To: 26-Sep-19</p>	<p>OurPower</p> <p>1 incorrect status</p> <p>For three ICPs, the start read applied by OurPower was inconsistent with the CS read.</p> <p>ICP 0000780936WE7F7 was missing from the Day 13 file for January 2019</p> <p>Some NHH FE and HE issues exist.</p> <p>Potential impact: Low</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 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
<p>Correction to reconciliation files for incorrect CS Read</p> <p>Status updated</p> <p>The missing ICP has been added in a resubmission.</p> <p>Improvements to automation for estimates</p>		Sep-Nov 2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We are updating the checking process and reviewing the automated systems to reduce likelihood of error; including prompts if ICP has an inactive status in registry but has consumption.</p> <p>We have added an automated email where an RR may be necessary to prompt an OurPower user to input RR details to send if appropriate.</p>		October 2019
Remedial action status		
Identified		

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: Clause 10.36 From: 01-Oct-18 To: 03-Oct-19	Arrangements not in place with MTRX, FCLM or NGCM Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Contact other MEPs to organize MEP contracts to attain compliance.		October 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Get contracts in place with other MEPs		January 2020
Identified		

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Oct-18</p> <p>To: 24-Sep-19</p>	<p>OurPower</p> <p>Some late status and trader event updates</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 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
<p>An automated disconnection process is being developed into place, which will update the registry as part of the disconnection/reconnection process.</p>		November 2019
<p>An alert has been put into place to notify OurPower if there is a read on a meter which is recorded as disconnected on the registry</p>		September 2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Automated warnings have been put into place to notify OurPower if there is a read on an inactive ICP</p>		September 2019
Identified		

Management of "active" status			
Non-compliance	Description		
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 22-Jul-19 To: 17-Sep-19	OurPower Incorrect status for one ICP Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Incorrect status updated for ICP		September 2019	
Preventative actions taken to ensure no further issues will occur		Completion date	
Automated messages, automated update process, exception report monitored		September-November 2019	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 01-Oct-18 To: 24-Sep-19	OurPower Average daily consumption calculation in CS files does meet the functional specification. 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 because average daily consumption in CS files is accurate. The current calculation is accurate. If OurPower changes the calculation to only include the last day of supply, it's likely the average daily consumption figures will be misleading for some ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Stay in breach as information provided for average daily consumption is more accurate and less misleading than required process (i.e. estimate is final day's consumption only)	N/A	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
None – CS file while failing to meet specification, audit notes that CS file data is accurate and fixing breach would create a misleading outcome	N/A	

Retailers must use same reading - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Oct-18</p> <p>To: 24-Sep-19</p>	<p>OurPower</p> <p>For three ICPs that switched in with estimated readings on WEL Networks meters, OurPower's start read did not match the losing trader's CS read.</p> <p>Potential impact: Low</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>Controls are rated as moderate as they are sufficient to ensure that all consumption is captured most of the time, the issue relates to a small subset of switches where a WEL Networks meter is used for settlement by the losing retailer and is switched to OurPower on an estimated CS reading.</p> <p>The impact is assessed to be low and will result in over submission by 493 kWh across the three ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Process to validate meter reads and process to send RRs for meter have been developed		October 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Procedure to ensure that RRs are sent		October 2019	

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-Oct-18</p> <p>To: 24-Sep-19</p>	<p>OurPower</p> <p>One ICP with an incorrect switch event meter reading.</p> <p>Average daily consumption calculation in CS files does meet the functional specification</p> <p>Potential impact: Medium</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	<p>The controls are rated as strong because average daily consumption in CS files is accurate and because the incorrect reading issue is now resolved.</p> <p>The current average daily calculation is accurate. If OurPower changes the calculation to only include the last day of supply, it's likely the average daily consumption figures will be misleading for some ICPs. There was a minor impact of one day's consumption for one ICP where the incorrect reading was used.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Stay in breach for CS – as report notes, the data provided is accurate – and changing will result in a misleading outcome</p> <p>We have changed the timing of the automated job to start later in the day, to ensure that midnight read is in prior to sending RR</p> <p>Process to delay by 1 day to provide extra time for CS to be received</p>		<p>October 2019</p> <p>September 2019</p> <p>October 2019</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Automate process with validation checks		October 2019	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 09-Oct-18 To: 18-Oct-18	OurPower 2 late AC files 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 recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Automated process to receipt and advise OurPower operator to respond – the meter read issue which resulted in an AC error was fixed last year at the time of the AC files.	November 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Automated process and procedure	November 2019	

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: 01-Oct-18</p> <p>To: 25-Sep-19</p>	<p>OurPower</p> <p>Five incorrect NW rejections</p> <p>One late NW</p> <p>Two AW files were issued late.</p> <p>Potential impact: Low</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 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>Automated NW rejection rules were updated to require manual decision on the AW file. A notification is sent to OurPower to prompt them to fix outstanding AW files.</p> <p>Late NW related to request from other retailer to update their MEP record prior to OurPower taking over – no action required.</p> <p>We are implementing automated reminders for outstanding AW/NW files at the end of day, to ensure these are sent on time.</p>	<p>Pre-audit</p> <p>n/a</p> <p>October 2019</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Notification of NW is sent to CSRs via email on date NW is received</p> <p>Reminders for outstanding NWs issued at end of day</p>	October 2019	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 17-Mar-19 To: 17-Sep-19	OurPower One switch event meter reading not applied correctly 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 recorded as strong because this matter is now resolved. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Delay the automated job to allow time for record to be received – check in automation to ensure date is correct and read received	October 2019	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Amendments to the automated process's timing to ensure meter readings are present before CS is sent.	October 2019	

Identification of readings			
Non-compliance	Description		
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 01-Oct-18 To: 26-Sep-19	OurPower Forward estimates identified as historic estimates. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Fixed automated process to correctly identify estimates		September 2019	
Preventative actions taken to ensure no further issues will occur		Completion date	
Fixed automated process to correctly identify estimates		September 2019	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Oct-18 To: 26-Sep-19	OurPower HHR aggregates files do not contain electricity supplied information. ICP 0000780936WE7F7 did not have volume information submitted until R3 for January 2019. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The issue relating to content of the aggregates file is an error in the code, OurPower are providing submission information as expected. Controls are rated as strong, because OurPower has checks in place to identify inaccurate information. The impact is assessed to be low because revised data was be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
Automation being reviewed to determine cause of incident and appropriate preventative action required	November 2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation being reviewed to determine cause of incident and appropriate preventative action required	November 2019	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 01-Jan-19 To: 26-Sep-19	OurPower For three ICPs, the start read applied by OurPower was inconsistent with the CS read. ICP 0000780936WE7F7 was missing from the Day 13 file for January 2019. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Automation and processes being applied to correctly send RR files, and ensure that all ICPs are reported in RM files	November 2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Automated process being reviewed to determine cause of missing read Automation and processes being applied to correctly send RR files, and ensure correct opening read used if RR file isn't sent	October/November 2019	

Historical estimates and forward estimates			
Non-compliance	Description		
Audit Ref: 12.10 With: Clause 3 Schedule 15.3 From: 01-Jul-19 To: 26-Sep-19	OurPower FE identified as HE in NHH vols file Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Corrected code to fix estimate process		September 2019	
Preventative actions taken to ensure no further issues will occur		Completion date	
Corrected code to fix to fix estimate process		September 2019	

Historical estimate process		
Non-compliance	Description	
Audit Ref: 12.11 With: Clause 4 and 5 Schedule 15.3 From: 01-Mar-19 To: 26-Sep-19	OurPower Shape files not used to calculate HE Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The calculation based on a flat lien is accurate but there are no controls in place regarding the use of shape files. The impact on settlement and participants is minor because the total kWh is correct, but the apportionment is incorrect; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Corrected code to use shape profile instead of flat profile	September 2019	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Corrected code to use shape profile instead of flat profile	September 2019	

Historical estimate reporting to RM			
Non-compliance	Description		
Audit Ref: 13.3 With: Clause 10 Schedule 15.3 From: 01-Mar-19 To: 26-Sep-19	OurPower Quantity of HE not correctly recorded Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Changed code to do HE and FE correctly		September 2019	
Preventative actions taken to ensure no further issues will occur		Completion date	
Changed code to do HE and FE correctly		September 2019	