

Compliance plan for Brooklyn Energy – 2019

Non-compliance	Description		
Audit Ref: 2.1 With: 15.2 From: 01-Jun-18 To: 31-Oct-19	Incorrect calculation of ICP days Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, extra monitoring needs to be implemented. Audit risk rating is recorded as low because of impact on the market settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>There is a conflict between the RM/ Registry spec and the Rules:</p> <p>We believe that AMS are complying with the rules as the ICP that creates this anomaly is a generation only icp, therefore contributes volume information (albeit generation) and as such ICP Days should be calculated)</p> <p>15.6 Retailer and direct purchaser ICP days information</p> <p>(1) Each retailer and direct purchaser (excluding direct consumers) must deliver a report to the reconciliation manager detailing the number of ICP days for each NSP for each submission file of submission information in respect of—</p> <p>(a) submission information for the immediately preceding consumption period, by 1600 hours on the 4th business day of each reconciliation period; and</p> <p>(b) revised submission information provided in accordance with clause 15.4(2), by 1600 hours on the 13th business day of each reconciliation period.</p> <p>(2) The retailer or direct purchaser must calculate the ICP days information in subclause (1) using the data contained in the retailer's or direct purchaser's reconciliation system when it aggregates volume information for ICPs into submission information.</p> <p><small>Compare: Electricity Governance Rules 2003 rule 4.2.1 part J</small></p> <p>8.8.AV-110 Receive ICP days information</p> <table border="1" data-bbox="212 920 1174 1137"> <tr> <td>Sub-process:</td> <td>AV-110 Receive ICP days information</td> </tr> <tr> <td>Process:</td> <td>Accept and validate information</td> </tr> <tr> <td>Source:</td> <td>Traders and direct purchasers (excluding direct consumers)</td> </tr> <tr> <td>Code references:</td> <td>Clause 15.6 of the Code</td> </tr> <tr> <td>Dependencies:</td> <td></td> </tr> </table> <p>Description:</p> <p>The Reconciliation Manager receives a report from each trader and direct purchaser (excluding direct consumers) detailing the number of ICP days for each NSP that the submission information contains. Only ICPs with Installation Types of 'Load' and 'Both' are included.</p> <p>Note that where an ICP has both half-hour and non-half-hour meter types, the ICP days will have been counted for each meter type. Also, for the purposes of this report, prepaid and un-metered ICPs are to be included in the non-half-hour category.</p>	Sub-process:	AV-110 Receive ICP days information	Process:	Accept and validate information	Source:	Traders and direct purchasers (excluding direct consumers)	Code references:	Clause 15.6 of the Code	Dependencies:			Disputed
Sub-process:	AV-110 Receive ICP days information											
Process:	Accept and validate information											
Source:	Traders and direct purchasers (excluding direct consumers)											
Code references:	Clause 15.6 of the Code											
Dependencies:												
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>											
<p>EA needs to remove or clarify this anomaly, not penalise the retailer</p>												

Non-compliance	Description	
Audit Ref: 2.8 With: 11.15B From: 01-Jun-18 To: 31-Oct-19	No provision in agreement with their customers to allow the Authority to assign the rights and obligations of the trader to another trader if the trader commits an event of default. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as moderate. 2 ICPs are the owners of the company, the third one has been with the company for 15 years. The customer is satisfied with the arrangement. Audit risk rating recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
None		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We intend to prepare terms and conditions before the next audit.		

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7 From: 07-Jan-19 To: 31-Oct-19	Incorrect supplied volumes for Dec'18 Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong; it was "one-off" human error. We would recommend comparing BILLED volumes with the previous months submission. Audit risk low, no impact on the market settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status
This instance was caused by a single transcription error, nearly a year ago. No other errors have occurred, so we regard this as a "one off"			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will change data source for reporting so that values can be copied and pasted rather than manually transcribed.		15/11/19	