

Compliance plan for Plus Energy 2020

Title: Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10</p> <p>Schedule 11.1</p> <p>From: 17-Apr-19</p> <p>To: 02-Oct-19</p>	<p>One late status update to active.</p> <p>One late status update to inactive.</p> <p>Two late trader 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 rated as moderate because they are adequate to ensure that the registry is updated on time most of the time. The late paperwork was identified and chased up by Plus Energy.</p> <p>The risk is low as most updates were completed on time or soon after they were due. Some of the late updates were backdated corrections which improved data accuracy but caused a late registry update.</p>	
Actions taken to resolve the issue		Completion date
<p>In these instances we were reliant on receiving information from third parties, there was nothing we could do to avoid the delay.</p> <p>In the case of the new connection we made the MEP aware that we had not received the new connection information as we picked up that we had started to receive data from their meter (through the meter reads they send us). The MEP then provided the information and we entered the correct status date which showed up as being backdated.</p>		28 Feb 2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The back dating was due to the late arrival of the reports to us confirming the activity had taken place. In both cases the correct event dates have been imputed.</p> <p>In instances like these we are reliant on third parties informing us of certain activities therefore we cannot ensure there will be no further issues.</p>		28 Feb 2020
		Identified

Title: Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 10-Apr-19</p> <p>To: 10-Apr-19</p>	<p>One late status update to active for a new connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 the delay was primarily caused by late receipt of connection information. The late paperwork was identified and chased up by Plus Energy.</p> <p>The audit risk rating is low, because the update was made eight business days late.</p>	
Actions taken to resolve the issue		Completion date
We were able to identify that the MEP had not provided the new connection information through the meter reads we had started to receive. We advised the MEP that we had started receiving data and they then sent us the information. We entered the correct status date once the information was provided.		28 Feb 2020
Preventative actions taken to ensure no further issues will occur		Completion date
As we are reliant on third parties providing us this information we cannot ensure there will be no further issues in the future.		28 Feb 2020

Title: Gaining trader informs registry of switch request - switch move	
Non-compliance	Description
<p>Audit Ref: 4.7</p> <p>With: Clause 9 Schedule 11.3</p> <p>From: 07-Oct-19</p> <p>To: 10-Nov-19</p>	<p>The NT files for 0000160283CKF22 (01/10/19) and 0000501126NR9FF (01/11/19) were issued more than two business days after pre-conditions were cleared.</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	<p>The controls are currently rated as strong. The late files were a temporary issue, caused by a reduction in staff levels. The issue is not expected to recur, because reduced customer numbers have made the workloads more manageable with existing staff numbers.</p> <p>The impact is low, because two files were issued two business days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We will focus on processing files within the required timeframes.		28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will give greater priority to compliance vs other non-compliance activities such as customer billing to help ensure we meet the requirement time lines in future.		28 Feb 2020	

Title: Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11</p> <p>Schedule 11.3</p> <p>From: 01-Oct-19</p> <p>To: 01-Oct-19</p>	<p>The CS files for ICPs 0136757030LC301 (01/10/19), 0000681305HB547 (01/10/19), 0000552005NR0FA (01/10/19) and 0000515333NRA7B (01/10/19) contained some errors.</p> <p>The average daily kWh in the CS file for 0000610644UN2C9 (01/10/19) did not reflect the average daily consumption between the last two actual reads, resulting in a difference of 13 kWh.</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
Low	<p>The controls are rated as moderate. Files are processed manually, which is reasonable given the relatively small number of transactions which are expected to occur. There is some room for errors to occur, and all of the files checked contained some incorrect information.</p> <p>The impact is assessed to be low, because the incorrect information may have a very minor impact on settlement. Two of the files with incorrect content were withdrawn and replaced.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>The primary issue here is that I have been entering the incorrect "Last Read Date" when an estimated read has been provided as the read for the last date of responsibility. I have not always been entering the Last Read Date as the date of the "Actual" last read received.</p> <p>For ICP 0000610644UN2C9 the most recent daily average consumption prior to switching was 377 and this had been entered however this was for a period covered by an estimate. The last Actual to Actual read daily average consumption was 390 which should have been entered, a variance of 13 kWhs.</p>	28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Instructions have been provided by the Auditor on which date to use when entering an estimated read as at the last day of responsibility.	28 Feb 2020	

Title: Metering information	
Non-compliance	Description
<p>Audit Ref: 4.16</p> <p>With: Clause 21</p> <p>Schedule 11.3</p> <p>From: 01-Oct-19</p> <p>To: 01-Oct-19</p>	<p>For one CS file issued by Plus Energy, the switch event read did not reflect the actual reading or best estimate of an actual reading on the event date.</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>Controls are rated as moderate, the issue occurred due to a manual data entry error.</p> <p>The audit risk rating is low, the difference between the readings is 4,236 kWh.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>As you will see from this Audit report this ICP has been problematic for us. We had significant issues locating this meter and obtaining manual reads from our contractor and had used photo reads until the contractor reads commenced. We have reviewed the requirements for switching including use of "A" and "E", "Last Read Dates" and read data Instructions on when to use "E" vs "A".</p> <p>Further difficulties were experienced when the contractor sent an incorrect manual read. This read showed the unit consumption declined from the contractor's prior month reading by 5,00+ units. Fortunately our data providers systems picked up this error, so reconciliation was not impacted, and we picked up the error so customer billing was also not affected.</p>	28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have reviewed the requirements for switching including use of "A" and "E", "Last Read Dates" and read data Instructions on when to use "E" vs "A" including when using a photo read.	28 Feb 2020	

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: 09-Apr-19</p> <p>To: 09-Apr-19</p>	<p>A photo reading for 0000681305HB547 on 09/04/19 was treated as an actual reading without being validated against a set of actual readings from another source.</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>Controls are rated as moderate, because customer and photo readings are rarely received, but where they are received, they are treated as validated readings. Photo readings are no longer expected because all ICPs currently supplied have HHR meters.</p> <p>The audit risk rating is low. The incorrectly classified photo reading could have a minor impact on submission if it was found to be incorrect. I viewed the photo and confirmed that the correct reading had been supplied to JC Consulting and entered into the RM tool.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Participant comments By way of feedback...We find photo reading to be more reliable than manual reads from contractors. We have had experiences of manual reads being entered incorrectly when being captured by contractors. We find it hard to understand that 2 validated reads from additional sources would be required at the same time the photo read is being relied upon, given photo reads are used sparingly for the rare situations where an electronic read and a manual read are not available.</p> <p>For example the Wells read for this ICP taken on the 28th of August was for 5,752 units LESS than their previous read just 30 days prior. Yet no alert was given to us or any correction made by Wells, they just sent us the incorrect read.</p> <p>Both our data reconciliation and billing systems and processes identified the Wells read error and we were able to ignore the Wells read and make an estimate for that month.</p> <p>We have been able to validate the photo read from 2 subsequent and correct Wells manual reads, but these were not available at the time we relied on the photo read.</p> <p>We have received instructions from the Auditor to in future use "E" for photo reads and not "RD" unless we have 2 validated reads from additional sources at the time we are relying on the photo read. Given its highly unlikely we would ever have 2 validated reads from additional sources at the time of relying on a photo read we will in future use "E" for all photo reads.</p>	28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
In future we will record all photo reads as "E" unless there are 2 validated reads from other sources available at the same time we are relying on the photo read.	28 Feb 2020	

Title: NHH meter reading application	
Non-compliance	Description
<p>Audit Ref: 6.7</p> <p>With: Clause 6</p> <p>Schedule 15.2</p> <p>From: 01-Oct-19</p> <p>To: 01-Oct-19</p>	<p>For one CS file issued by Plus Energy, the switch event read did not reflect the actual reading at the end of Plus Energy's last day of responsibility.</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>Controls are rated as moderate, the issue occurred due to a manual data entry error.</p> <p>The audit risk rating is low, the difference between the readings is 4,236 kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This is the same ICP referred to in 6.6. above. This was a result of human error. The read data for this ICP had been corrupted by an incorrect reading supplied by a contractor (manual read) and we compounded the error by entering incorrect data at the time of switching.		28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have reviewed the requirements for entering data during the switch process.		28 Feb 2020	

Title: Identification of readings	
Non-compliance	Description
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3)</p> <p>Schedule 15.2</p> <p>From: 01-Oct-19</p> <p>To: 05-Dec-19</p>	<p>For two CS files issued by Plus Energy, switch event reads were recorded with an incorrect read type.</p> <p>A photo reading for 0000681305HB547 on 09/04/19 was treated as an actual reading without being validated against a set of actual readings from another source.</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.</p> <ul style="list-style-type: none"> CS files are processed manually, which is reasonable given the relatively small number of transactions which are expected to occur. There is some room for errors in read labelling to occur. Photo readings are rarely received because all ICPs currently supplied have HHR metering installed. Where photo readings have been supplied, they are treated as actual readings. <p>The audit risk rating is low.</p> <ul style="list-style-type: none"> All the switch event reads are treated as actual or permanent estimate readings, so there is no impact on submission. The incorrectly classified photo reading could have a minor impact on submission if it was found to be incorrect. Photo readings are no longer

	expected because all ICPs currently supplied have HHR meters. I viewed the photo and confirmed that the correct reading had been supplied to JC Consulting and entered into the RM tool.	
Actions taken to resolve the issue	Completion date	Remedial action status
These issues have been addressed and commented on above.	28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per previous comments re these issues and ICPs.	28 Feb 2020	

Title: HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 of part 15 From: 01-Apr-19 To: 07-Feb-20	Aggregates file contains submission information. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the aggregates file is correct compared to the functional specification. There is no impact on settlement because the aggregates file is only used for reporting, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Participant comments I understand that the EA is aware that this is an error in the code and has now been this way since we commenced operations back in April 2017. We are advised this is not something that we as a retailer can fix.	28 Feb 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are advised this is not something that we as a retailer can fix.	28 Feb 2020	

Title: Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 09-Apr-19</p> <p>To: 09-Apr-19</p>	<p>A photo reading for 0000681305HB547 on 09/04/19 was treated as an actual reading without being validated against a set of actual readings from another source.</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>Controls are rated as moderate, because customer and photo readings are rarely received, but where they are received, they are treated as validated readings. Photo readings are no longer expected because all ICPs currently supplied have HHR meters.</p> <p>The audit risk rating is low. The incorrectly classified photo reading could have a minor impact on submission if it was found to be incorrect. I viewed the photo and confirmed that the correct reading had been supplied to JC Consulting and entered into the RM tool.</p>	
Actions taken to resolve the issue		Completion date
This is a repeat of the issue identified in 6.6. above.		28 Feb 2020
Preventative actions taken to ensure no further issues will occur		Completion date
We have received instructions from the Auditor to in future use "E" for photo reads and not "RD" unless we have two other sources to validate the photo read.		28 Feb 2020
		Identified