

## COMPLIANCE PLAN FOR ECOTRICITY - 2020

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2, 15.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Incorrect information for a small number of ICPs; incorrect volumes submission for Dec'18 (rev3) and Apr'19 (rev7), Jan'20 (day13)</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls are rated as weak because processes for managing ICP status in the registry are not robust and result in under submitting volumes. The audit risk rating as medium because it requires more analysis of the volumes effected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35  From: 17-Apr-19 To: 17-Apr-19	One HHRVOLS file for Mar'19 was late by 4 minutes Potential impact: None Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, it was one-off incident., Audit risk rating is recorded as low because there was no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an abnormal off slip up and the file was provided as soon as the issue was identified.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was an abnormal off slip up and the file was provided as soon as the issue was identified.  Further, we are migrating to a new and more automated platform which we expect will resolve the root cause (time) but also be able to report better.		Complete	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Late trader updates to registry, status changes.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate. The new process of synchronising the registry information and ORION has decreased the number of late updates. Impact on settlement outcome is minor due to the low number of ICPs. Audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better. May / June 2020		May / June 2020	

Non-compliance	Description		
Audit Ref: 3.5 With: 9 of Schedule 11.1 From: 01-Mar-19 To: 29-Feb-20	33 late updates to “active” status, incorrect profile for 25 ICPs (solar), missing information for 4 SUML ICPs Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made but ORIONs functionality precludes it. The audit risk rating is low because the impact on the settlement outcome is negligible (small number of ICPs with very low usage).		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1  From: 01-Mar-19 To: 29-Feb-20	Incorrect ANZSIC code assigned to 4 ICPs Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made. More monitoring of the status of new connections is required. The audit risk rating is low because the impact on the settlement outcome is minor (small number of ICPs).		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: 9(1)(f) of Schedule 11.1</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>4 SUML ICPs are missing (Daily Unmetered kWh) in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as moderate because there are some improvements that can be made but ORIONs functionality precludes it. The audit risk rating is low because the impact on the settlement outcome is negligible (small number of ICPs with very low usage).</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: 17 of Schedule 11.1</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>A number of ICPs have incorrectly assigned “inactive” status when they should be “active”</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate because they require some adjustment to the process. Minor impact on settlement outcomes. Audit risk rating is low because a small number of ICPs are effected		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
Audit Ref: 3.9 With: 19 of Schedule 11.1  From: 01-Mar-19 To: 29-Feb-20	A number of ICPs have incorrectly assigned “inactive” status when they should be “active” Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate because they require some adjustment to the process. Minor impact on settlement outcomes. Audit risk rating is low because a small number of ICPs are affected		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	



Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 01-Mar-19 To: 29-Feb-20	Incorrect information in 3 CS files Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate, the process in place is not satisfactory, it needs to be re-engineered. Ecotricity sent 3 CS files and 2 of them had incorrect information. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
Audit Ref: 4.4 With: 6(1) of Schedule 11.3  From: 01-Mar-19 To: 29-Feb-20	One RR file was sent late 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>	Controls are recorded as strong even though it is a manual process. Impact on settlement outcome is minor. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: 10(1) of Schedule 11.3</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>2 CS files late. Incorrect information in one CS file</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate, the process in place is not satisfactory, it needs to be re-engineered. Ecotricity sent 4 CS files and one of them had incorrect information. Audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
Audit Ref: 4.11 With: 12 of Schedule 11.3 From: 01-Mar-19 To: 29-Feb-20	One RR file was sent late 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>	Controls are recorded as strong. The process is managed well. There was no impact on settlement outcome.. Audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an irregular error from the team.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was an irregular error from the team.		Complete	

Non-compliance	Description		
Audit Ref: 4.15 With: 6(1) of Schedule 11.3 From: 01-Mar-19 To: 29-Feb-20	Incorrect withdrawal reason code used for 3 ICPs Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate because they require some adjustment to the process. Minor impact on settlement outcomes. Audit risk rating is low because of the small number of ICPs affected		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an irregular error from the team.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was an irregular error from the team.		Complete	

Non-compliance	Description		
Audit Ref: 6.1 With: 15.13  From: 01-Mar-19 To: 29-Feb-20	27 ICPs have embedded generation recorded in the registry but ECOT uses RPS profile in the registry, the reconciliation manager was not notified  Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, the process in place is not satisfactory, it needs to be re-engineered. Audit risk rating is recorded as low because of the small number of ICPs		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: 8(1(a)of Schedule 15.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>100% attainment was not achieved for, on average, 13 NSPs per month</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as moderate because the process needs to be refined. Further, Ecotricity's business strategy is to replace legacy meters with smart meters after a switch is complete. Audit risk rating is low because of the small number of ICPs effected. ORION estimates data at the end of each month.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: 9(1) of Schedule 15.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>90% attainment was not achieved for, on average, 12 NSPs per month</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as moderate because the process needs to be refined. Further, Ecotricity's business strategy is to replace legacy meters with smart meters after a switch is complete. Audit risk rating is low because of the small number of ICPs effected. ORION estimates data at the end of each month.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: 17 of Schedule 15.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>HHR data is not checked for unexpected 0 values</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</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 recorded as moderate; they do not cover all requirements of this clause e.g. "unexpected 0 values". Low risk rating is assigned due to a minor impact on settlement outcomes because data is highly scrutinized during billing run</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This will be difficult to check for the period of lockdown however we recognise once lockdown ends we will be able to improve this process.</p> <p>Further, we are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.</p>		To be confirmed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>This will be difficult to check for the period of lockdown however we recognise once lockdown ends we will be able to improve this process.</p> <p>Further, we are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.</p>		To be confirmed	



Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Mar-19 To: 29-Feb-20	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Ecotricity submits submission volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will continue to submit volumes in accordance with RM specification			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to submit volumes in accordance with RM specification			

Non-compliance	Description		
Audit Ref: 12.2 With: 15.4 From: 01-Apr-19 To: 04-Apr-19	HHRVOLS for March'19 was late by 4 minutes Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. The process in place is satisfactory. Audit risk rating is recorded as low because there is no impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an abnormal off slip up and the file was provided as soon as the issue was identified.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was an abnormal off slip up and the file was provided as soon as the issue was identified.		Complete	

Non-compliance	Description		
<p>Audit Ref: 12.8</p> <p>With: 4 of Schedule 15.2</p> <p>From: 01-Mar-19</p> <p>To: 29-Feb-20</p>	<p>Permanence of meter reading for the period Mar'18 to Dec'18 not achieved</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate because there are some improvements that can be made to them. Ecotricity trades a small number of NHH ICPs for which metering is changed to HHR as soon as possible. The audit risk rating is low because the impact on the settlement outcome is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Mar-19</p> <p>To: 30-Nov-19</p>	<p>Historical Estimate targets not met for revision 3, 7, and 14</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are recorded as moderate, the process in place is not satisfactory, it needs to be re-engineered. Audit risk rating is recorded as low because impact on settlement outcomes is minor</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We are migrating to a new and more automated platform which we expect will resolve the root cause but also be able to report better.		May / June 2020	