

## Compliance plan for Stack Energy - 2021

Non-compliance	Description		
Audit Ref: 1.11 With: 15.37A  From: 04-Mar-21 To: 01-May-21	Audit report completed late Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The audit risk rating is recorded as low because the number of ICPs traded by Stack Energy is small therefore any impact to the market will be minor		
Actions taken to resolve the issue		Completion date	Remedial action status
Take the audit once we were notified due date was late		01/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Apply reconciliation audit before 2 months of expiry date. Dedicated managing people will be assigned and be aware of the Authority rules and follow to prevent market impact		-01/05/2021	

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2(1)  From: 01-Dec-19 To: 31-Mar-21	A relatively low number of information inaccuracies were identified during the audit.  Potential impact: Low  Actual impact: Low  Audit history: Twice before  Controls: Strong  Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as strong. During the audit evidence was produced showing considerable steps taken to achieve accuracy. No impact on settlement outcomes. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Check our system whether it is following the current rules and data.		01/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Stack Energy data management system is investigating and it will reduce human error.		31/12/2021	

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Dec-19 To: 31-Mar-21	One late status update Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. Well managed process, one late registry status update. Submission volumes were correct. There was no impact on settlement. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Status had been updated		30/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This ICP was reconnected before switching completion. Dedicated managing person has been assigned for checking the status more frequently.		01/05/2021	

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Jan-20</p> <p>To: 31-Mar-21</p>	<p>Calculation of average kWh per day does not comply with Registry Functional Specification v22.32. 8 CS files were sent late. 6 CS files were sent late</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		
Low	Controls are rated as moderate; more care must be taken with the timing of sending CS files. The audit risk rating is low because the number of switches affected was low. It has no impact on settlement		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching order has been updated		30/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
System development is going to be finalised for the switching process and also calculation of average consumption data. Human error will be reduced once the automation system is finalised. During the investigation period we will monitor Registry web page manually every day.		31/12/2021	

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 03-May-20 To: 03-May-20	AN file was not sent for one ICP and one AN file was late  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 rated as strong; good process in place. The audit risk rating is low because only two ICPs were affected. It has no impact on settlement outcome. Audit risk rating low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching has been finalised		27/07/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Evaluate Stack Energy switching system that will update the right process for NT and MI. During this period we set the dedicated person to manage the switching process		31/12/2021	

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: 10(2) of Schedule 11.3</p> <p>From: 05-Jul-20</p> <p>To: 27-Jul-20</p>	<p>A switch date for one ICP was determined later than requested by more than 10 business days</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong; Out of 15 switches, there was a single error. The audit risk rating is low because only one ICP was affected. It has no impact on settlement		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching has been done		27/07/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Evaluate Stack Energy switching system that will update the right process for the Switching. During this period we set the dedicated person to manage the switching process		31/12/2021	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 11 of Schedule 11.3</p> <p>From: 01-Jan-20</p> <p>To: 31-Mar-21</p>	<p>Calculation of average kWh per day does not comply with Registry Functional Specification v22.32.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, good process. The audit risk rating is low because the number of switches affected was low. It has no impact on settlement		
Actions taken to resolve the issue		Completion date	Remedial action status
We set the dedicated person to manage the average consumption for each ICP		30/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
System development is going to be finalised for the switching process and also calculation of average consumption data. Human error will be reduced once the automation system is finalised. During the investigation period we will monitor Registry web page manually every day.		31/12/2021	

Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: 7(1) Schedule 15.2</p> <p>From: 01-Dec-19</p> <p>To: 13-Mar-20</p>	<p>ICP 1001122101LC5A4 did not have a validated meter reading during the period of supply by STAK, it switched to another trader on 14/03/2020</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</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. The company misunderstood that a property manager read is not a validated meter read unless it is validated against an actual read . Only one ICP effected. No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Checked all non-AMI meter ICP from out ICP data		01/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Dedicated people will manage non-AMI meter ICP to get a meter reading once per every 4 months.		01/05/2021	



Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: Audit Ref: 8(1) of Schedule 15.2</p> <p>From: 01-Dec-19</p> <p>To: 31-Mar-21</p>	<p>The read attainment was not met for one to four ICPs over 8 months</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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 recorded as strong however there is a problem with access to vacant premises for which owners do not want their supply disconnected. No impact on settlement outcomes. Audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Checked all non-AMI meter ICP from out ICP data		01/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Dedicated people will manage non-AMI meter ICP to get a meter reading once per every 4 months.		01/05/2021	

Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: Audit Ref: 9(1) of Schedule 15.2</p> <p>From: 01-Dec-19</p> <p>To: 31-Mar-21</p>	<p>The read attainment was not met for three NSPs (ALB0331, TAK0331 and SVL0331)</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>Controls are recorded as strong however there is a problem with access to vacant premises for which owners do not want their supply disconnected. No impact on settlement outcomes. Audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Contacted client for an access to the building		30/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
These are vacant house(show home)and 2 commercial buildings (motel and real estate). Key is required to access a meter box. During Covid 19 period, they closed the business Stack Energy organise the schedule with clients to read meters once per 4 months.		31/05/2021	

Non-compliance	Description		
Audit Ref: 12.2 With: 15.4  From: 01-Jul-20 To: 31-Mar-21	Incorrect volumes were submitted for 0000451601UNFCE for July 2020 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 rated as strong, good process in place. There was minor impact on settlement outcome. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Read data has been corrected in our system		01/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Decommission, reconnection and disconnection cases have set the rule for meter reading data once it happens.		01/05/2021	

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Jan-20</p> <p>To: 31-Mar-21</p>	<p>Historical Estimate targets not met for revision 3 and 7 for a few months</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		
Low	Controls are rated as moderate because there are some improvements that can be made to them. There was no impact on settlement because it was only one NSP and the number of traded ICPs is small. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will create a process for Stack Energy, as a reconciliation participant, to manually read non-AMI meters.		01/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Created the spreadsheet which can manage a meter reading data for non-AMI meters already and it will be developed in our management system. We will request MEP to upgrade from legacy meter to AMI meter for gaining actual meter reading.		31/12/2021	