

# Compliance plan for Ecotricity – 2021

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Dec-20</p> <p>To: 09-Jul-21</p>	<p>Some registry discrepancies exist.</p> <p>Several scenarios leading to incorrect submission information.</p> <p>Inaccurate HHR data where ARC is the MEP due to having only one decimal place.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>Controls are rated as moderate at the time of the audit, because the validation reporting has been improved and submission issues are being identified and resolved in a more timely manner.</p> <p>The impact is assessed to be medium because the kWh differences have been reduced.</p>	
Actions taken to resolve the issue		Completion date
Improved validation reporting to identify and resolve issues as they occur.		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Continuously working to improve our validation reporting and processes to identify and resolve these issues.		Ongoing
		Identified

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A  From: 25-Feb-21 To: 25-Feb-21	ICP 0000190215TRA73 was not certified within five business days of reconnection. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as weak because there isn't a process in place to request certification to occur. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
A report has been created to monitor expired meter certifications.		End of Feb 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Metering Team is setting up a process to monitor this report more frequently and request recertification of expired meters.		End of Oct 2021
		Identified

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: Clause 10.36 From: 01-Dec-20 To: 31-May-21	MEP arrangement is not in place with WEL Networks. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
MEP arrangements will be made as soon as possible.		End of Aug 2021
Preventative actions taken to ensure no further issues will occur		Completion date
MEP arrangements will be made as soon as possible.		End of Aug 2021
		Identified

Meter bridging			
Non-compliance	Description		
<p>Audit Ref: 2.17</p> <p>With: Clause 10.33C and 2A of Schedule 15.2</p> <p>From: 13-Jan-21</p> <p>To: 20-Jan-21</p>	<p>Correction has not occurred for ICP 0000572387NRFFB for the bridged period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak because they don't ensure corrections are made as soon as practicable.</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
We will work towards developing a process to check for bridged meters and enter reads for the bridged period.		End of Dec 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will work towards developing a process to check for bridged meters and enter reads for the bridged period.		End of Dec 2021	

Provision of information on dispute resolution scheme		
Non-compliance	Description	
<p>Audit Ref: 2.19</p> <p>With: Clause 11.30A</p> <p>From: 01-Apr-21</p> <p>To: 06-Jul-21</p>	<p>Utilities Disputes information is not present on the website or in outbound communications.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as weak because the requirements were published in October 2020 and the required actions are not all complete.</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
Ecotricity has recently designed a new website that is about to go live. Utilities Dispute information will be included in this.		16/08/2021
A new email footer is currently being created to include this information in all outgoing communication to customers and will be live within the next week.		06/08/2021
The invoice template will be updated with the correct information.		31/08/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity has recently designed a new website that is about to go live. Utilities Dispute information will be included in this.		16/08/2021
A new email footer is currently being created to include this information in all outgoing communication to customers and will be live within the next week.		06/08/2021
The invoice template will be updated with the correct information.		31/08/2021
		Identified

Provision of information on electricity plan comparison site		
Non-compliance	Description	
Audit Ref: 2.20 With: Clause 11.30B From: 01-Apr-21 To: 06-Jul-21	Powerswitch information is not present in communications. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	There are no processes in place to communicate with customers regarding Powerswitch. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Ecotricity has recently designed a new website that is about to go live. Powerswitch information will be included in this.		16/08/2021
A new email footer is currently being created to include this information in all outgoing communication to customers and will be live within the next week.		06/08/2021
The invoice template will be updated to include this information.		31/08/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity has recently designed a new website that is about to go live. Powerswitch information will be included in this.		16/08/2021
A new email footer is currently being created to include this information in all outgoing communication to customers and will be live within the next week.		06/08/2021
The invoice template will be updated to include this information.		31/08/2021
		Identified

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1  From: 02-Dec-20 To: 12-May-21	21 late updates to active status. Three late updates to inactive status. 149 late trader updates. 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>	The controls are recorded as moderate. There is now a process to validate esales against a list file with history and some other validation reports are being used.  The impact on settlement and participants is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Validation reporting is in place to help identify and update ICPs.		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Further investigation will be undertaken to evaluate additional processes to avoid late trader updates including a report to monitor ICPs with zero consumption.		Ongoing
		Identified

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: 03-Dec-20</p> <p>To: 18-Apr-21</p>	<p>11 late status updates to active for new connections.</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	
<b>Low</b>	<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
Ecotricity will review processes to identify improvements that can be made to reduce the number of late status updates for new connections.		End of Mar 2022
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity will review processes to identify improvements that can be made to reduce the number of late status updates for new connections.		End of Mar 2022
		Identified



ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 01-Dec-20 To: 06-Jul-21	At least 10 incorrect ANZSIC codes. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
Processes to check the audit compliance report and check customer's ANZSIC code upon registration will be implemented.		End of Oct 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Processes to check the audit compliance report and check customer's ANZSIC code upon registration will be implemented.		End of Oct 2021
		Identified

Losing trader must provide final information - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 01-Apr-21</p> <p>To: 19-May-21</p>	<p>One CS breach for a transfer switch.</p> <p>Incorrect average daily consumption for one ICP.</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 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
Significant improvements within switching have been implemented since the last audit to ensure switching is completed in the required timeframe.		End of May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ecotricity will continue to monitor CS files to ensure they are accurate and sent on time.		Ongoing	

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-Dec-20</p> <p>To: 27-Apr-21</p>	<p>Incorrect (but accurate) readings used for three ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Multiple times</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 because they minimise risk to an acceptable level.</p> <p>The impact on settlement and participants is negligible; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
RR processes have been automated to improve the efficiency of sending RR files. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
RR processes have been automated to improve the efficiency of sending RR files. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		Ongoing
		Identified

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 01-Dec-20 To: 27-Apr-21</p>	<p>Five T2 breaches for switch moves.</p> <p>Two ET breaches for switch moves.</p> <p>One CS breach.</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	
<b>Low</b>	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The impact on other participants was minor because the files were only late by one or two days. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Significant improvements within switching have been implemented since the last audit to ensure switching is completed in the required timeframe.		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity will continue to monitor AN and CS files to ensure they are accurate and sent on time.		Ongoing
		Identified

Losing trader determines a different date - switch move		
Non-compliance	Description	
Audit Ref: 4.9 With: Clause 10(2) Schedule 11.3  From: 23-Mar-21 To: 31-Mar-21	Two ET breaches for switch moves. Potential impact: Low Actual impact: Low 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 they mitigate risk to an acceptable level. The impact on participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Significant improvements within switching have been implemented since the last audit to ensure switching is completed in the required timeframe.		End of May 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity will continue to monitor AN files to ensure they are accurate and sent on time.		Ongoing
		Identified

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3  From: 02-Apr-21 To: 02-Apr-21	Incorrect daily kWh for one ICP. 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>	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
Ecotricity is checking what caused this discrepancy to see if any changes need to be made to the calculation of average daily consumption in the CS file.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity is checking what caused this discrepancy to see if any changes need to be made to the calculation of average daily consumption in the CS file.		Ongoing
		Investigating

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3  From: 05-Feb-21 To: 05-Feb-21	Incorrect (but accurate) readings used for one ICP. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they minimise 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
RR processes have been automated to improve the efficiency of sending RR files. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
RR processes have been automated to improve the efficiency of sending RR files. Ecotricity uses best efforts to ensure the correct switch read is used and will continue to monitor these.		Ongoing
		Identified

Withdrawal of switch requests			
Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 25-May-21 To: 28-May-21	One NA breach. One NW breach. 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>	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
Significant improvements within switching have been implemented since the last audit to ensure switching is completed in the required timeframe.		End of May 2021	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Ecotricity will continue to monitor NW and AW files to ensure they are accurate and sent on time.		Ongoing	



Switch saving protection		
Non-compliance	Description	
Audit Ref: 4.17 With: Clause 11.15AA to 11.15AB From: 01-Dec-20 To: 30-Jun-21	Correspondence to switching customers' requests reasons for switching. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because customers are not contacted with offers to remain. The non-compliant practice is limited to requesting reasons for switching. The impact on participants is recorded as low, because the outbound correspondence can lead to customers changing their switching plans.	
Actions taken to resolve the issue		Completion date
Email communication has been changed to remove the question asking why the customer has switched.		13/07/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Email communication has been changed to remove the question asking why the customer has switched.		13/07/2021
		Cleared

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 10.13, Clause 10.24 and 15.13  From: 01-Dec-21 To: 08-Jul-21	Submission had not occurred for 27 ICPs with embedded generation and the RM was not notified of gifting. Two ICPs bridged during the audit period. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are recorded as weak because they need to be strengthened to identify ICPs with generation as soon as possible. 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
Additional reporting has been created to monitor distributed general discrepancies though processes need to be updated to check this more regularly.		End of Dec 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional reporting has been created to monitor distributed general discrepancies though processes need to be updated to check this more regularly.		End of Dec 2021	

Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 01-Jan-21 To: 30-Apr-21	Nine ICPs not read during the period of supply. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Reporting is in place but is not being actioned, therefore the controls are weak. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
		Identified

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Dec-20 To: 30-Apr-21	Best endeavours not met for four ICPs not read in the 12-month period. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Reporting is in place but is not being actioned, therefore the controls are weak. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Jan-21 To: 30-Apr-21	Two ICPs not read in the 4-month period. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Reporting is in place but is not being actioned, therefore the controls are weak. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
		Identified

Meter data used to derive volume information		
Non-compliance	Description	
<p>Audit Ref: 9.3</p> <p>With: Clause 3(5) of schedule 15.2</p> <p>From: 01-Dec-20</p> <p>To: 30-Apr-21</p>	<p>AMS and EDMl's EIEP3 file format rounds trading period data to 2 decimal places.</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	
<b>Low</b>	<p>The controls are rated as moderate because data includes all decimal places provided for most ICPs.</p> <p>The impact is assessed to be low for the EIEP3 format, because a small number of ICPs are expected to be affected and the issue only affects the third decimal place under certain circumstances.</p>	
Actions taken to resolve the issue		Completion date
As AMS and EDMl are providing the rounded data, we are unable to control how the data is supplied. Therefore, compliance will be achieved once the file format is updated.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As AMS and EDMl are providing the rounded data, we are unable to control how the data is supplied. Therefore, compliance will be achieved once the file format is updated.		Ongoing
		Investigating

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2  From: 01-Dec-20 To: 09-Jul-21	Event logs not routinely checked. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because most validations occur. The impact on settlement and participants is minor; therefore the audit risk rating is low. Phase failure, reverse power and meter critical events are individually emailed by MEPs.	
Actions taken to resolve the issue		Completion date
Ecotricity has identified the different ways event log files are received and will work to develop a process to monitor/investigate these.		End of Mar 2022
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity has identified the different ways event log files are received and will work to develop a process to monitor/investigate these.		End of Mar 2022

Electricity supplied information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.3</p> <p>With: Clause 15.7</p> <p>From: 01-Apr-20</p> <p>To: 09-Jul-21</p>	<p>Electricity supplied file incorrect for NSP SOH0011.</p> <p>Incorrect electricity supplied for May 2020.</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		
<b>Low</b>	<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>We are aware of the issue that caused the duplication of the kWh for NSP SOH0011 and are working to resolve this to ensure it does not occur again.</p> <p>We have resubmitted the AV120 file for May 2020 with the correct information in the month 14 submission.</p>		<p>Ongoing</p> <p>19/07/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We are aware of the issue that caused the duplication of the kWh for NSP SOH0011 and are working to resolve this to ensure it does not occur again.</p> <p>We have resubmitted the AV120 file for May 2020 with the correct information in the month 14 submission.</p>		<p>Ongoing</p> <p>19/07/2021</p>	



HHR aggregates information provision to the reconciliation manager			
Non-compliance	Description		
<p>Audit Ref: 11.4</p> <p>With: Clause 15.8</p> <p>From: 01-Nov-19</p> <p>To: 09-Jul-21</p>	<p>HHR aggregates file does not contain electricity supplied information.</p> <p>Errors in aggs file between March and December 2020.</p> <p>Under submission of 18,107.6 kWh due to ICPs missing from aggs file.</p> <p>1,600 kWh not included in R-14 for an inactive ICP with consumption.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>Controls are rated as moderate at the time of the audit, because the validation reporting has been improved and the analysis of December 2020 files shows manual interventions are no longer a significant issue.</p> <p>The impact is assessed to be medium because the kWh differences have been reduced.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Regarding the HHR aggregate files not containing electricity supplied information, compliance here will be achieved once the Authority completes the intended Code change to be aligned with the RM functional specification.</p> <p>Ecotricity has implemented a process to compare the HHR aggregates and HHR volumes files to check/resolve discrepancies each month.</p> <p>A report has been created to monitor consumption on inactive ICPs which we will monitor on a more regular basis to identify/resolve these issues to include consumption data in submissions.</p>		<p>Ongoing</p> <p>Jan 2020</p> <p>End of</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Regarding the HHR aggregate files not containing electricity supplied information, compliance here will be achieved once the Authority completes the intended Code change to be aligned with the RM functional specification.</p> <p>Ecotricity has implemented a process to compare the HHR aggregates and HHR volumes files to check/resolve discrepancies each month.</p> <p>A report has been created to monitor consumption on inactive ICPs which we will monitor regularly to identify/resolve these issues to include consumption data in submissions.</p>		<p>Ongoing</p> <p>Jan 2020</p> <p>Ongoing</p>	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-Dec-20</p> <p>To: 09-Jul-21</p>	<p>Errors in aggs file between March and December 2020.</p> <p>Under submission of 18,107.6 kWh due to ICPs missing from aggs file.</p> <p>1,600 kWh not included in R-14 for an inactive ICP with consumption.</p> <p>Submission of 576 kWh yet to occur for two inactive NHH ICPs with consumption.</p> <p>NHH generation kWh not submitted at the earliest opportunity.</p> <p>Some incorrect and late files as shown in the breach report.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate at the time of the audit, because the validation reporting has been improved and submission issues are being identified and resolved in a more timely manner.</p> <p>The impact is assessed to be medium because the kWh differences have been reduced.</p>	
Actions taken to resolve the issue		Completion date
<p>Ecotricity has implemented a process to compare the HHR aggregates and HHR volumes files to check/resolve discrepancies each month.</p> <p>A report has been created to monitor consumption on inactive ICPs which we will monitor on a more regular basis to identify/resolve these issues to include consumption data in submissions.</p> <p>Processes are continuously improving to ensure files are submitted correctly and on time.</p>		<p>Jan 2020</p> <p>Ongoing</p>
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

<p>Ecotricity has implemented a process to compare the HHR aggregates and HHR volumes files to check/resolve discrepancies each month.</p> <p>A report has been created to monitor consumption on inactive ICPs which we will monitor on a more regular basis to identify/resolve these issues to include consumption data in submissions.</p> <p>Processes are continuously improving to ensure files are submitted correctly and on time.</p>	<p>Jan 2020</p> <p>Ongoing</p>	
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Accuracy of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Dec-20</p> <p>To: 09-Jul-21</p>	<p>The most accurate data is not submitted in submission files when the following issues are identified:</p> <ul style="list-style-type: none"> <li>• missing ICPs,</li> <li>• additional ICPs,</li> <li>• consumption on inactive ICPs, and</li> <li>• generation present at ICPs.</li> </ul> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>Controls are rated as moderate at the time of the audit, because the validation reporting has been improved and submission issues are being identified and resolved in a more timely manner.</p> <p>The impact is assessed to be medium because the kWh differences have been reduced.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Validation reporting and improved processes have helped Ecotricity improve the accuracy of data in submission files. Further improvements and review of processes will continue to work towards resolving the identified issues.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Validation reporting and improved processes have helped Ecotricity improve the accuracy of data in submission files. Further improvements and review of processes will continue to work towards resolving the identified issues.		Ongoing	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 Schedule 15.2  From: 01-Jan-20 To: 09-Jul-21	Estimates not all replaced by the 14-month revision. 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>	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
Ecotricity has identified the ICPs with forward estimates from the reasons mentioned on the previous page. Work will be completed to resolve ICPs that are yet to have the 14-month revision submitted.		End of Aug 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Ecotricity has identified the ICPs with forward estimates from the reasons mentioned on the previous page. Work will be completed to resolve ICPs that are yet to have the 14-month revision submitted.		End of Aug 2021
		Identified

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 Schedule 15.3  From: Jan-20 To: Mar-21	Historic estimate thresholds were not met for some revisions. 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>	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
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A report has been created to check ICPs that are not being read though processes need to be updated to check this more frequently.		End of Dec 2021
		Identified