

Compliance plan for Genesis Energy Reconciliation Participant – 2021

Relevant information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 15.2 From: 01-Jul-20 To: 30-Jun-21	Some inaccurate data is recorded and was not updated as soon as practicable. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate overall but there is room for improvement identified. Some of these issues have been present for at least the last two audits and these need to be addressed before the controls could be rated as strong overall. The audit risk rating is medium due to the incorrect data being submitted to the market and sent to other traders as part of the switching process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have processes in place around vacant consumption but due to resource issues this has not been actively worked. Genesis will also review the current bridged meter process and look for way to improve the current controls. Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recently recruited 4 new Subject Matter Experts roles and 6 additional CSR's to support the current controls that are in place		1/10/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional resource will be utilised to support the current control reports to assist with the mitigation of Genesis' exposure to compliance risk		1/10/2021	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.32</p> <p>From: 01-Sep-20</p> <p>To: 05-May-21</p>	<p>GENE</p> <p>Four new connections were not certified within five business days.</p> <p>232 reconnections were not certified within five business days.</p> <p>ICP 1000023102BP693 has not been recertified when it was unbridged.</p> <p>GEOL</p> <p>50 reconnections were not certified within five business days.</p> <p>GENH</p> <p>Three new connections were not certified within five business days.</p> <p>Potential impact: Medium</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 as they will ensure compliance most of the time but the process to ensure certified metering is in place at the point of reconnection needs some improvement.</p> <p>Uncertified metering installations may be less accurate than certified metering installations, so there could be a minor impact on settlement. The audit risk rating is recorded as low.</p>	
Actions taken to resolve the issue		Completion date
Genesis have established a report that is provided to MEP's of any meters that were uncertified at the point of reconnection. Genesis would expect the MEPs to maintain their controls around the meter recertification. We will investigate further improvements to this process to negate the risk of new ICPs gained that are not certified being reported to the MEP		01/03/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis will increase visibility and look to introduce reporting 3 months in advance to notify the MEP of any meter equipment nearing certification expiry.		01/03/2022
		Investigating

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: Feb 21</p> <p>To: April 21</p>		<p>GENE</p> <p>MEPs not notified within one business day of bridging occurring in all instances.</p> <p>30 meters have yet to be unbridged.</p> <p>Consumption for the bridged period has not been submitted for 19 of the 31 unbridged ICPs</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	
Low		<p>Controls are rated as weak for bridging as the reporting in place will not adequately identify all bridged sites and the correction process has no visibility to confirm if these are actioned.</p> <p>The number of ICPs affected is small and therefore the impact on settlement is minor therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have a process in place to pick up meters that have been bridged however this is a manual process. Genesis has recently recruited 4 new Subject Matter Experts roles to support controls and process improvements initiatives whilst maintaining staff training for new/existing employees.		01/12/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Currently investigating potential improvements in related processes		01/12/2021	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 of schedule 11.1</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>Some status and trader updates were not processed within five business days of the event on the Registry.</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: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak, because although there is comprehensive reporting in place in the reconciliation team, the processes to correct the registry are not “real time” and the controls in the business areas are none, to weak.</p> <p>The audit risk rating is assessed to be low as whilst the events are backdated this is done to ensure submission occurs correctly.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis accepts that the level of accuracy is still below the required level</p> <p>Genesis have recently been through a structural change to support the Genesis strategic ways of working, this has included recruiting 4 new Subject Matter Experts roles to support controls and process improvements initiatives whilst maintaining staff training for new/existing employees.</p>		Continuous improvements
Preventative actions taken to ensure no further issues will occur		Completion date
Additional resource will be utilised to strengthen the current controls		Continuous improvements
		Investigating

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>Some late and incorrect status updates.</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: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls in rated as weak, because although there is comprehensive reporting in place in the reconciliation team, the processes to correct the registry are not “real time” and the controls in the business areas are none, to weak.</p> <p>The audit risk rating is low as the number of errors found were small and will be corrected through the revision cycle.</p>	
Actions taken to resolve the issue		Completion date
Genesis will review the current vacant consuming / new connection / reconnection processes to determine possible improvements to the process / controls.		01/03/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Review of the automation of new connection process was completed as exceptions were being managed weekly, this was changed to daily at the start of July 2021.		01/03/2022
		Investigating

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9(1)(k) of schedule 11.1</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>A moderate number of incorrect ANZSIC codes.</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	
Low	<p>The controls are rated as moderate because although the T99 codes are checked by the reconciliation team, the accuracy of ANZSIC codes on sign up needs improvement.</p> <p>There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity Authority's reporting accuracy, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Genesis have controls in place to mitigate risk and update registry information as soon as practicable once corrective information has been obtained.		01/02/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis are currently reviewing the onboarding processes for both residential and SME customer to determine options for obtaining the correct ANZIC code at the time of onboarding		01/02/2022
		Investigating

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>One ICP had missing daily unmetered kWh.</p> <p>Three ICPs had incorrect daily unmetered kWh.</p> <p>Five ICPs incorrectly have BTS unmetered recorded.</p> <p>GENH</p> <p>Missing unmetered details for one ICP.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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	
Low	<p>Controls are generally strong in this area.</p> <p>The impact on settlement is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Genesis continues to monitor and where possible provide corrective information to the registry when information is obtained that highlights a corrective action.		Continuous Improvement
Preventative actions taken to ensure no further issues will occur		Completion date
Continues to review UML details to ensure corrective actions are initiated upon the provision of corrective information.		Continuous Improvement
		Investigating

Management of “active” status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 of schedule 11.1</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>11 incorrect first active dates of those ICPs sampled.</p> <p>GEOL</p> <p>Six incorrect first active dates.</p> <p>GENH</p> <p>Two incorrect first active dates</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: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as there is no validation between the first active date, the initial electrical connection and the meter certification dates to identify potential incorrect active dates.</p> <p>The audit risk rating is low as the volume of errors found for the sample checked is small in relation to the overall number of electrical connections completed. .</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Review AC-020 reporting frequently to identify variances as they occur. Genesis is also in the process of creating a compliance dashboard that will assist the provision of increased visibility relating to these issues and will liaise with the Distributor regarding any corrective actions.		01/02/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The review will provide a proactive measure to assist with further preventative actions		01/02/2022	

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 01-Jul-20</p> <p>To: 30-Apr-21</p>	<p>GENE and GEOL</p> <p>Some incorrect inactive statuses.</p> <p>Potential impact: Medium</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	
Medium	<p>The controls are rated as moderate because there is room for improvement with regard to the identification and correction of incorrect statuses.</p> <p>Settlement is not occurring in some cases until the status is corrected, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
The communicating status is maintained by the MEP. Genesis have processes in place around vacant consumption but due to resource issues this has not been actively worked. Genesis have recently recruited 4 new Subject Matter Expert and are also recruiting for 6 additional CSR in the Customer Operations. This will provide the resource required to work the vacant consumption report.		01/12/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis will be providing additional resource in the area to support the review of current processes and reporting to improve compliance.		01/12/2021
		Identified

Losing trader response to switch request and event dates - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: Clause 3 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>Three incorrect AN codes sent of the sample checked.</p> <p>GEOL</p> <p>Two incorrect AN codes sent of the sample checked.</p> <p>GENH</p> <p>One late AN file.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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		
Low	<p>The controls are rated as strong as the process is driven off the ICP attributes based on a hierarchy.</p> <p>The audit risk rating is low as only a small number of incorrect codes were identified and only one late file was identified. This has no direct impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have strong controls in place and continue to monitor this and investigate potentially incorrect reads caused by CSR incorrectly processing files. To ensure accuracy the RR response can sometime take longer than the time required, this is often outside of Genesis' control		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continuous Improvement		Continuous Improvement	

Losing trader must provide final information - standard switch			
Non-compliance		Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>		<p>The average daily consumption calculation is not calculated from the last read period.</p> <p>GENE</p> <p>Five of 15 ICPs checked with last reads incorrectly labelled as actual but should have been sent as estimates.</p> <p>Five of 15 ICPs (different to the five above) checked where the last read date was the last billed date and the last read date was earlier.</p> <p>GEOL</p> <p>Two ICPs with a negative average daily consumption is incorrect as it is not consumption.</p> <p>One ICP with incorrect average daily consumption due to using the final billed average instead of read-to-read consumption.</p> <p>Five of 15 ICPs checked with last reads incorrectly labelled as actual but should have been sent as estimates.</p> <p>Five of 15 ICPs (different to the five above) checked where the last read date was the last billed date and the last read date was earlier.</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: 3</p>	
Audit risk rating		Rationale for audit risk rating	
Low		<p>The controls are recorded as weak as the volume of errors found in the ICPs sample was high indicating that the logic in Gentrack needs to be reviewed to improve accuracy.</p> <p>The audit risk rating is low as any variances between gain read and reads sent in the CS file are addressed via the RR process initiated by the gaining trader in most instances.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will be investigating potential process / systems improvements to be able to assess any corrective actions.		01/02/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
To be determined from above investigation		01/02/2022	

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-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>Seven late RR files.</p> <p>GEOL</p> <p>Five RRs not supported by two actual reads.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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		
Low	<p>The controls are strong because the process is sound and potentially incorrect readings are investigated as soon as possible.</p> <p>There is a minor impact on other traders and customers because rebilling has to occur. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have strong controls in place. To ensure accuracy the RR response can sometime take longer than the time required, this is often outside of Genesis' control		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continuous Improvement		Continuous Improvement	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 01-Sep-20 To: 27-Apr-21	GENH Two late NT files. Potential impact: Low Actual impact: Low Audit history: None 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 settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Reporting error due to switching code change. This has been corrected and Genesis are now compliant. Breach reports from Jan 21 processed correctly		Jan 21
Preventative actions taken to ensure no further issues will occur		Completion date
Reporting corrected in Jan 2021 to ensure compliance		Jan 21

Losing trader provides information - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>One incorrect AN response code sent.</p> <p>Two incorrect event dates.</p> <p>1,527 late CS files.</p> <p>6 E2 breaches.</p> <p>1 ET breach.</p> <p>GEOL</p> <p>259 late CS files.</p> <p>GENH</p> <p>One late AN file sent.</p> <p>Four late CS files sent.</p> <p>One E2 breach</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		
Low	<p>The controls are rated as moderate because changes were made in February 2021 to avoid the large number of late CS files.</p> <p>The audit risk rating is low as the late files are being sent within days of their due date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recruited 4 new Subject Matter Experts to support the current controls, process improvements and assist with staff training. Genesis are also recruiting for an additional 6 CSR's to relieve current resource constraints.		01/02/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Changes made in Feb 2021 to improve controls		01/02/2022	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>The average daily consumption calculation is not calculated from the read-to-read period.</p> <p>GENE</p> <p>34 ICPs sent with a negative average daily consumption are incorrect as it is not consumption and of the five sampled all were sent with an incorrect final read.</p> <p>Two of the five ICPs sampled with a high average daily consumption figure were found to be incorrect and were sent with an incorrect final read.</p> <p>Five of 15 ICPs checked with incorrect last read labelled as actual but should have been sent as estimates.</p> <p>Five of 15 ICPs checked where the last read date was shown as the last billed date but the last read date was earlier.</p> <p>Six of the 15 ICPs where the incorrect final read was in the CS file.</p> <p>Six ICPs not read during the period of supply were sent with the disconnection reads as actuals for the event date.</p> <p>GEOL</p> <p>All 17 ICPs with a negative average daily consumption are incorrect as it is not consumption, and all were sent with an incorrect final read.</p> <p>One of the four ICPs with a high average daily consumption figure was found to be incorrect.</p> <p>Four of 15 ICPs checked with incorrect last read labelled as actual but should have been sent as estimates.</p> <p>Five of 15 ICPs checked where the last actual read date is recorded incorrectly.</p> <p>Four of 15 ICPs checked with incorrect switch event meter readings.</p> <p>Two ICPs where the CS file was sent with estimated last billed reads rather than the last actual read gained.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are recorded as weak as the volume of errors found in the ICPs sample was high indicating that the logic in Gentrack needs to be reviewed to improve accuracy.</p> <p>The audit risk rating is low as any variances between gain read and reads sent in the CS file are addressed via the RR process initiated by the gaining trader in most instances.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will review the current controls that are in place and look to make improvements to these to negate the risk of non-compliance.	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
The review will provide preventative actions	Continuous Improvement	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11</p> <p>With: Clause 12 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>23 late RR files.</p> <p>RR incorrectly rejected for ICP 0000214277UNACF.</p> <p>GEOL</p> <p>Five late RR files.</p> <p>RR files incorrectly rejected for ICPs 0006995667RN4A1, 0007122856RNEB6 and 0000918556TUA73.</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	
Low	<p>The controls are moderate as the controls will mitigate risk most of the time but there is still room for errors to occur.</p> <p>There is a minor impact on other traders and customers because rebilling has to occur. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
To improve accuracy and the correct outcome for the customer the RR response can sometime take longer than the time required, this is often outside of Genesis' control	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continuous Improvement	Continuous Improvement	

Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.12</p> <p>With: Clause 14 Schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>HH switch NT files sent for ineligible ICPs.</p> <p>One late NT file.</p> <p>One PT breach indicating a backdated switch.</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 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
Genesis will review the current processes and controls and make improvements to negate the compliance risk where possible		01/05/2022
Preventative actions taken to ensure no further issues will occur		Completion date
The review will provide preventative actions		01/05/2022

Losing trader provision of information - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.13</p> <p>With: Clause 15 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENH</p> <p>Five AN breaches.</p> <p>One incorrect response code.</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 as the team have good visibility of workflow but due to resource constraint these were late.</p> <p>The audit risk rating is low as these they were only a few days late and had no impact on settlement.</p>	
Actions taken to resolve the issue		Completion date
Genesis will continue to review the C&I end to end processes and implement controls and process to improve these where possible.		01/05/2022
Preventative actions taken to ensure no further issues will occur		Completion date
The review will provide preventative actions		01/05/2022
		Investigating

Gaining trader to advise the registry manager - gaining trader switch			
Non-compliance	Description		
<p>Audit Ref: 4.14</p> <p>With: Clause 16 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENH</p> <p>Two CS breaches.</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 rated as strong as the team have good visibility of workflow but due to resource constraint these were late.</p> <p>The audit risk rating is low as these they were only a few days late and had no impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to review the C&I end to end processes and implement controls and process to improve these where possible.		01/05/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Will be addressed fully as part of the billing platform change		01/05/2022	

Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clause 17 & 18 of schedule 11.3</p> <p>From: 25-Sep-20</p> <p>To: 14-Apr-21</p>	<p>GENE</p> <p>Two incorrect NW codes.</p> <p>11 SR breaches.</p> <p>100 NA breaches.</p> <p>GEOL</p> <p>One incorrect NW code.</p> <p>Seven SR breaches.</p> <p>33 NA breaches.</p> <p>GENH</p> <p>One incorrect NW code.</p> <p>One SR breach.</p> <p>One NW breach.</p> <p>Two NA breaches.</p> <p>One late AW</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 recorded as strong as these are managed on a case by case with good controls to ensure that content is accurate and timeliness reporting is in place.</p> <p>There was a minor impact on settlement due to the correction of consumption information. There was also a minor impact on the customer; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have strong controls in place and the processes are in place to ensure that the customer impact is mitigated. This results in some exceptions that need to be worked, ensuring the accuracy of these can sometimes be to the detriment of timeliness		01/06/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to look for efficiencies within this process		01/06/2022	

Metering information			
Non-compliance	Description		
<p>Audit Ref: 4.16</p> <p>With: Clause 216 of schedule 11.3</p> <p>From: 01-Sep-20</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>17 incorrect last reads sent.</p> <p>GEOL</p> <p>11 incorrect last reads sent of those sampled.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 as the controls will mitigate risk most of the time but there is room for errors to occur.</p> <p>The audit risk rating is low as these are expected to be corrected through the RR process in most cases.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis will review current processes and controls to identify possible improvement to mitigate the risk of non-compliance.</p> <p>Genesis have processes in place around vacant consumption but due to resource issues this has not been actively worked.</p> <p>Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recruited 4 new Subject Matter Experts to support the current controls, process improvements and assist with staff training. Genesis are also recruiting for an additional 6 CSR's to relieve current resource constraints</p>		01/05/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The above review will highlight potential preventative actions		01/05/2022	

Unmetered threshold			
Non-compliance	Description		
<p>Audit Ref: 5.2</p> <p>With: Clause 10.14 (2)(b)</p> <p>From: 01-Aug-18</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>10 ICPs with unmetered load over 6,000 kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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		
Low	<p>The controls are recorded as moderate as Genesis are working with the customers concerned to resolve these, but this is taking longer than expected.</p> <p>The impact on settlement is unknown because the load has not been checked but submission is occurring. I have recorded the audit risk rating as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis continue to review unmetered load greater than the threshold and will work with customers to mitigate the compliance risk.</p> <p>Genesis are currently recruiting for a Data Stakeholder Lead, this role will manage Distributed Unmetered Load customers databases.</p>		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to investigate these as part of the UML reporting process.		Continuous Improvement	

Unmetered threshold exceeded			
Non-compliance	Description		
<p>Audit Ref: 5.3</p> <p>With: Clause 10.14 (5)</p> <p>From: 01-Jul-19</p> <p>To: 27-Apr-21</p>	<p>GENE</p> <p>Unmetered load over 6,000 kWh per annum and not resolved within the allowable timeframes.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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		
Low	<p>The controls are recorded as moderate as Genesis are working with the customers concerned to resolve these, but this is taking longer than expected.</p> <p>The impact on settlement is unknown because the load has not been checked. I have recorded the audit risk rating as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis continue to review unmetered load greater than the threshold and will work with customers to mitigate the compliance risk.</p> <p>Genesis is currently recruiting for a Data Stakeholder Lead, this role will manage Distributed Unmetered Load customers databases</p>		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to investigate these as part of the UML reporting process.		Continuous Improvement	

Distributed unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.4</p> <p>With: Clause 11 Schedule 15.3</p> <p>From: 01-Jul-19 To: 31-Jul-20</p>	<p>GENE</p> <p>Inaccurate submission information for several databases.</p> <p>Eight database audits not completed.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate as Genesis are working to resolve the databases not yet audited but as this is reliant on third parties co-operating this is proving challenging. For those databases audited corrections are being made where possible.</p> <p>There is a major impact on settlement outcomes because there are examples of over submission and under submission; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis continues to work with their customers to improve or maintain accuracy level of asset database information pertaining to DUML.</p> <p>Genesis is currently recruiting for a Data Stakeholder Lead, this role has been established to manage Distributed Unmetered Load customers databases to enable better data reporting and compliance outcomes.</p>		Continuous improvement
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to review and provide exception reporting to the customer to assist in maintaining database information.		Continuous improvement
		Investigating

Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24 and 15.13</p> <p>From: Aug-20 To: April 21</p>	<p>GENE</p> <p>Two ICPs of the sample checked that were generating or likely to be generating but did not have compliant metering installed, and notification of gifting had not been provided.</p> <p>Five of the ICPs reported in the 2020 audit that were generating have either not been corrected prior to switching away from Genesis (3 ICPs) or are still to be corrected (2 ICPs).</p> <p>61 meters were bridged during the audit period. While meters are bridged energy is not quantified in accordance with the code.</p> <p>GEOL</p> <p>Four meters were bridged during the audit period. While meters are bridged energy is not quantified in accordance with the code.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate for distributed generation. Processes are in place but are not consistently followed through to ensure that compliant metering is installed, or notification of gifting is provided.</p> <p>Controls are rated as weak for bridging as the reporting in place will not adequately identify all bridged sites and the correction process has no visibility to confirm if these are actioned.</p> <p>The impact on settlement is minor therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Genesis will review the ICPs highlighted as having potential generation and will also review the controls / processes for identifying whether the metering is compliant for the site. Genesis will be also reviewing the current Bridged meter process as per 2.17		01/12/2021
Preventative actions taken to ensure no further issues will occur		Completion date
The above review will highlight the required preventative actions		01/12/2021
		Investigating

Responsibility for metering at GIP			
Non-compliance		Description	
Audit Ref: 6.2 With: Clause 10.26(7) From: Aug-20 To: April 21		Four late certification updates made to the RM. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as moderate for the updating of GIPs meter recertifications. The audit risk rating is low as the meters were certified at all times and there was no impact on reconciliation.	
Actions taken to resolve the issue		Completion date	Remedial action status
The Genesis team responsible for the certification of these meters are now fully aware of the compliance requirements in relation to certification update and will comply with these moving forward			
Preventative actions taken to ensure no further issues will occur		Completion date	
As above			

Reporting of defective meters			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 10.43(2) and (3)</p> <p>From: 19-Oct-20</p> <p>To: 30-Jun-21</p>	<p>GENE</p> <p>The MEP was not advised of one meter bridged on 19/10/20 of the sample provided as the service request was not issued to them to unbridge.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak, as the controls do not sufficiently mitigate the risk of correcting bridged meters.</p> <p>The audit risk rating is low as only one ICP was identified from the samples provided that had not been notified to the MEP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will be reviewing the current Bridged meter process as per 2.17. Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recruited 4 new Subject Matter Experts to support the current controls, process improvements and assist with staff training. Genesis are also recruiting for an additional 6 CSR's to relieve current resource constraints		01/02/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The above review will highlight the required preventative actions		01/02/2022	

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: 01-Jul-20</p> <p>To: 30-Jun-21</p>	<p>GENE</p> <p>No action taken to address the ICP with signs of tampering or damage, and the ICP with missing or broken seals identified in the 2020 audit.</p> <p>Customer reads still not being validated against a set of readings from another source. Evident in the 2020 example that has not been corrected as this is a system issue.</p> <p>GEOL</p> <p>No action taken to address the ICP with signs of tampering or damage, and the ICP with missing or broken seals identified in the 2020 audit.</p> <p>Further evidence of meter events not being actioned with one example of seals not present and intact, and one example of phase failure not being actioned.</p> <p>Customer reads still not being validated against a set of readings from another source. Evident in the 2020 example that has not been corrected as this is a system issue.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak as the management of meter events remains patchy resulting in potential defective metering not being corrected in a timely manner.</p> <p>The impact is assessed to be low, as the volume of events is small in relation to the number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis to review current processes below;</p> <p>Wells files: investigate potential process change to ensure relevant meter readers notes are investigated accordingly</p> <p>AMS files: Review meter event report to remove unrequired noise and enable us to focus on working on the required events.</p>		01/12/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The above review will highlight the required preventative actions		01/12/2021	

NHH meter reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 30-Jul-20</p> <p>To: 30-Jun-21</p>	<p>GENE</p> <p>11 incorrect switch reads.</p> <p>GEOL</p> <p>Nine incorrect switch reads.</p> <p>GENE and GENH</p> <p>NHH meter readings not applied at 2400 on the day of the meter reading for NHH to HHR upgrades and downgrades where the meter is replaced.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</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 as there is room for improvement with switch read accuracy.</p> <p>The audit risk rating is low as any variances between gain read and reads sent in the CS file are addressed via the RR process initiated by the gaining trader in most instances providing the RR is accepted.</p>	
Actions taken to resolve the issue		Completion date
<p>These were due to human errors and reads were available but not used. Genesis will review the current process and controls.</p> <p>The additional 4 SME's that Genesis have recruited will support with staff training and processing improvements.</p>		01/02/2022
Preventative actions taken to ensure no further issues will occur		Completion date
The above review will highlight the required preventative actions		01/02/2022
Investigating		

Interrogate meters once			
Non-compliance	Description		
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Apr-20</p> <p>To: 31-Mar-21</p>	<p>GENE</p> <p>Four of the samples of ten ICPs unread during the period of supply did not have exceptional circumstances and, the best endeavours requirement was not met.</p> <p>GEOL</p> <p>Six of the sample of ten ICPs unread during the period of supply did not have exceptional circumstances and, the best endeavours requirement was not met.</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: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are weak as the management of unread ICPs has weakened during the audit period with not all ICPs being identified or actioned.</p> <p>The impact on billing and settlement is considered to be minor because a small number of ICPs are affected, and the period of supply is generally short.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have a project underway to replace existing legacy meters with smart meters, which will assist with this point. For legacy meters where the ICP is with us for less than 2 months we may not have attempted to gain an actual read, for ICPs with us for more than 2 months we would have attempted to read the meter. Genesis will review the current process and controls to see if process and system improvements can be made		01/02/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Review current process and controls and implement any possible changes		01/02/2022	

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Apr-20</p> <p>To: 31-Mar-21</p>	<p>GENE</p> <p>18 of the sample of 26 ICPs unread in the 12 months ended March 2021 did not have exceptional circumstances and the best endeavours requirement was not met.</p> <p>GEOL</p> <p>12 of the sample of 15 ICPs unread in the 12 months ended March 2021, did not have exceptional circumstances and the best endeavours requirement was not met.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are weak as the management of unread ICPs has weakened during the audit period with not all ICPs being identified or actioned.</p> <p>The impact is low, because overall read attainment rates are reasonably high.</p>	
Actions taken to resolve the issue		Completion date
Genesis is assigning more resource to working the 'No Access' and 'Comms Fault' reports to negate the risk of non-compliance. Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recruited 4 new Subject Matter Experts to support the current controls, process improvements and assist with staff training. Genesis are also recruiting for an additional 6 CSR's to relieve current resource constraints		01/12/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Introduction of further staffing resource to process the control reports.		01/12/2021
		Identified

NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Dec-20</p> <p>To: 31-Mar-21</p>	<p>GENE</p> <p>Exception circumstances did not apply, and the best endeavours requirement was not met for any of the 15 ICPs sampled.</p> <p>GEOL</p> <p>Exception circumstances did not apply, and the best endeavours requirement was not met for any of the ten ICPs sampled.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak as the ICPs affected are largely Account managed and there is room for improvement in the management of these.</p> <p>The impact is low, because overall read attainment rates are reasonably high.</p>	
Actions taken to resolve the issue		Completion date
Genesis is assigning more resource to working the 'No Access' and 'Comms Fault' reports to negate the risk of non-compliance. Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recruited 4 new Subject Matter Experts to support the current controls, process improvements and assist with staff training. Genesis are also recruiting for an additional 6 CSR's to relieve current resource constraints		01/12/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Introduction of further staffing resource to process the control reports.		01/12/2021

HHR interrogation data requirement		
Non-compliance	Description	
Audit Ref: 6.13 With: Clause 11(2) Schedule 15.2 From: 03-Aug-20 To: 02-Sep-20	Event logs were not received and reviewed for one manual download. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong and the impact as low, because a small number of manual downloads were affected. Event logs have been received and reviewed for all manual downloads received after 2 September 2020.	
Actions taken to resolve the issue		Completion date
Strong controls are already in place, however Genesis will continue to review processes / controls and make improvements were possible		Continuous Improvement
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to review / improve processes and controls		Continuous Improvement
		Identified

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-Jul-20</p> <p>To: 30-Jun-21</p>	<p>GENE and GEOL</p> <p>Because all meter removal reads are recorded as actual, estimated meter removal readings which capture consumption during stopped, faulty or bridged periods are incorrectly classified as actual readings.</p> <p>Some CS files had estimated readings classified as actual readings.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be moderate, and the impact is assessed to be low. Most readings were correctly classified.</p> <p>The audit risk rating is assessed to be low as the volume of errors was small overall.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis will review the current process regarding removal reads and final reads to determine potential improvements and ascertain how this will impact the Genesis settlement process.</p> <p>Genesis have recently recruited 4 new Subject Matter Experts and are recruiting for 6 additional CSRs within the customer operations team, a key focus will be placed on working the Bridge meter and Stopped meter controls and reviewing the processes / controls behind these</p>		01/12/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional staff / focus put on bridged meters, stopped meters and vacant consumption		01/12/2021	

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-Jul-20</p> <p>To: 30-Jun-21</p>	<p>AMS' EIEP3 and GENDF file formats round trading period data to 2 decimal places.</p> <p>AMI meter reading data is truncated for import into Gentrack and Derive.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are moderate. Only AMI meters which are settled as NHH are affected by meter readings being truncated in Gentrack and Derive.</p> <p>The impact is assessed to be low. Only NHH settled AMI readings provided with decimal places are affected, and the overall kWh difference is expected to be small.</p>	
Actions taken to resolve the issue		Completion date
Genesis accepts that the process is non-compliant and agrees with the potential and actual impact statements. As the rounding of the reads provided by AMI will have an impact on NHH settlements due to the potential of estimation in any period if a month end read was not provided. Genesis acknowledges that there maybe a ≥ 0.1 and <1.0 -unit impact upon switching or decommissioning of site.		Under review
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis are currently reviewing potential replacements for their NHHMM reconciliation tool which currently has constraints with both seasonality and read decimals.		Under review

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15 Schedule 15.2</p> <p>From: 15-Oct-20 To: 26-Jan-21</p>	<p>GENH</p> <p>No estimated data was provided for ICP 1000588995PC498 for Oct 2020 r0 and r1, Nov 2020 r0 and r1, and Dec 2020 r0 and r1 as insufficient information was available to create the estimate.</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	
Low	<p>The controls are recorded as strong because in most cases estimates are created.</p> <p>The impact is low because revised submission data based on actual volumes has been or will be washed up.</p>	
Actions taken to resolve the issue		Completion date
Genesis's current controls are strong, under the DA provision, however we will request NGC to review the process / controls relating to the provision of estimations and ensuring the revision information is provided as per code requirements.		Continuous Improvement
Preventative actions taken to ensure no further issues will occur		Completion date
		Investigating

NHH metering information data validation			
Non-compliance	Description		
<p>Audit Ref: 9.5</p> <p>With: Clause 16 Schedule 15.2</p> <p>From: 01-Jul-20 To: 30-Jun-21</p>	<p>GENE and GEOL</p> <p>Zero consumption validation not being carried out.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as weak overall. Expected validations are being managed except for zero consumption.</p> <p>The impact is assessed to be medium but is unknown as to how much consumption is occurring due to zero consumption not being managed unknown.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis have recently been through a structural change to support the Genesis strategic ways of working and have recruited 4 new Subject Matter Experts to support the current controls, process improvements and assist with staff training.</p> <p>Genesis are also recruiting for an additional 6 CSR's to relieve current resource constraints.</p> <p>A key focus will be ensuring that the Bridge meter, stopped meter controls are worked and that the processes / controls behind these are reviewed / Improved</p>		01/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional resource to work control reports		01/12/2021	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Jul-20 To: 30-Jul-21	GENE, GEOL and GENH HHR aggregates files do not contain electricity supplied information. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The issue relating to content of the aggregates file is an error in the code, Genesis is providing submission information as expected.	
Actions taken to resolve the issue		Completion date
Correct, Genesis will not be changing its processes		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
n/a		n/a
		Cleared

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-April-20</p> <p>To: 30-Jun-21</p>	<p>GENE</p> <p>Two ICPs with distributed generation where no generation volumes were submitted for ICPs 0000011546HR322 and 0000029648HRF96 whilst GENE was the trader.</p> <p>Five GENE ICPs identified in the 2020 which are believed to be generating which still do not have compliant metering installed or notification of gifting provided.</p> <p>Some inactive consumption was missing from submissions because corrections had not been processed as soon as practicable.</p> <p>Consumption during bridged periods was missing from submissions because corrections were not processed as soon as practicable.</p> <p>GEOL</p> <p>Some inactive consumption was missing from submissions because corrections had not been processed as soon as practicable.</p> <p>GENH</p> <p>Unmetered load volumes submitted incorrectly under the GENE participant code.</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	
Low	<p>The controls are rated as moderate overall, but processing of corrections and bridged meters have room for improvement.</p> <p>The impact is assessed to be low but is unknown in relation to the bridged meters as these corrections are not being processed in all instances.</p>	
Actions taken to resolve the issue		Completion date
Genesis will continue to review the process and look for effective solutions to enable process improvements		01/03/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Implement improvements found as part of the review		01/03/2022

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Apr-20</p> <p>To: 30-Jun-21</p>	<p>GENE and GEOL</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate overall as they are sufficient to ensure that most submission information is correct, but there is some room for improvement to the read and billing validation processes which identify and correct errors.</p> <p>The impact is assessed to be medium based on the proportion of corrections not carried against the sample checked. ,</p>	
Actions taken to resolve the issue		Completion date
Genesis will be reviewing its current processes and implement change where possible. The reconciliation team continues to support these processes where exceptions are found and corrected.		01/02/2022
Preventative actions taken to ensure no further issues will occur		Completion date
The above review will identify possible improvements		01/02/2022
		Investigating

Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: Clause 4 Schedule 15.2</p> <p>From: Dec-19 r14 to Feb-20 r14</p>	<p>GENE and GEOL</p> <p>Some estimates were not replaced with permanent estimates by revision 14.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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	
Medium	<p>The controls are rated as moderate, because there are processes in place to attain readings by revision 14 and enter permanent estimate readings.</p> <p>The potential impact is rated as low. There are sound estimation processes, therefore I have recorded the audit risk rating as medium.</p>	
Actions taken to resolve the issue		Completion date
Genesis will continue to look revising the read attainment processes to actively seek read data, Genesis will review the process and make any possible adjustments in accordance to the permanence of estimated reads requirements. Genesis also have a project underway to replace existing legacy meters with smart meters, which will assist with read attainment.		01/03/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Review and Revise current process to check whether permanent estimates are meeting 12.8 requirements. This will also require a revision of the read attainment processes for sites unable to be read which feeds the permanence process.		01/03/2022
		Investigating

Reconciliation participants to prepare information			
Non-compliance	Description		
<p>Audit Ref: 12.9</p> <p>With: Clause 2 of schedule 15.3</p> <p>From: 01-April-20</p> <p>To: 30-Jun-21</p>	<p>GENH</p> <p>Unmetered load volumes submitted incorrectly under the GENE participant code.</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	<p>The controls are rated as strong as this a technical non-compliance and the only way Genesis can submit these volumes without affecting the HHR submissions.</p> <p>The impact is assessed to be low as the volumes associated with these ICPs is minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to review and where possible improve the processes.		01/05/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Current processes were implemented to mitigate the risk. Where possible Genesis will make improvements on those processes.		01/05/2022	

Forward estimate process			
Non-compliance	Description		
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: 01-Apr-20 To: 30-Jun-21</p>	<p>GENE and GEOL</p> <p>The accuracy threshold was not met for some months and revisions, because forward estimate was too high or too low.</p> <p>Potential impact: High</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		
Low	<p>Controls are rated as moderate. The FDE process will ensure that forward estimate is consistent with the meter's historic consumption but does not take into account seasonality. The FSE process applies the same daily average to each meter register regardless of the number of meter registers installed or customer type and does not take into account seasonality.</p> <p>Initial data is replaced with revised data and washed up. A small number of submissions had differences over the threshold.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to look revising the read attainment processes to actively seek read data which will ultimately lesson the variance percentages between revisions. Genesis also have a project underway to replace existing legacy meters with smart meters, which will assist with read attainment.		01/03/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The calculation of volume using seasonal adjustments only caters for historical estimation calculation. The forward estimation process does not as per the code. The systems implemented by Genesis in 2006 were and still are compliant although they are restricted, and seasonality is not currently used to adjust the initial calculation of energy volumes. With the changes coming in Genesis there will be a revision on the current NHH settlement tool which may enable the implementation of such seasonal adjustments to occur in the initial settlement process. Genesis are reviewing the read attainment process(s) to improve initial revision accuracy		01/03/2022	

Historical estimate reporting to RM			
Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: Dec 19-Feb 20 (r14), Apr 19-Jun 20 19 (r7) and Sep 20-Nov 20 (r3)</p>	<p>GENE and GEOL</p> <p>Historic estimate thresholds were not met for some revisions.</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		
Low	<p>The controls are rated as moderate because some improvements can be made to ensure compliance.</p> <p>GENE and GEOL were reasonably close to the target in all cases. The impact is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to review the controls in order to increase meter read attainment, leading to greater accuracy levels in HE on the affected NSPs		continuous improvements	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Implement improvements found as part of the review view be undertaken.		continuous improvements	