

Compliance plan for Vodafone DUML – 2021

Distributed unmetered load audits			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 14-Sep-17 To: 17-May-21	Audit not conducted within the required timeframe. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because Mercury has had to develop a database from scratch and this process started as soon as the ICPs switched in. The impact on settlement and participants is moderate; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
When Mercury inherited these connections, there was no unmetered database in place despite having been connected for many years under other retailers. Mercury began working with Vodafone as soon as these ICPs were switched in, to establish a compliant DUML database to ensure for accurate submission and compliance with the code. This has been a lengthy process and has required coordination among different parties. A number of new ICPs have been created to comply with DUML database requirements and Vodafone have completed full field audits to ensure connections details are recorded correctly.		N/A	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
This is a complex one-off instance and we believe we have adequate process in place to comply in normal circumstances.		N/A	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: 11(1) of Schedule 15.3</p> <p>From: 14-Jun-17</p> <p>To: 15-May-21</p>	<p>Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls in place are rated as moderate because there was a wattage calculation, but it was based on incorrect inputs.</p> <p>The impact is assessed to be high based on the under submission of 400,000 kWh per annum.</p>	
Actions taken to resolve the issue		Completion date
<p>On further analysis, we believe our total unmetered kWh values prior to March 2021, will have been in line with the estimated consumption calculated from this audit.</p> <p>We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. As this is unlikely to be a quick process, we have inflated our kWh values for each ICP by 17.5% (from March21) to more accurately reflect the correct volumes in our submissions. Once the correct wattages have been confirmed following Vodafone's second field audit, the corrections will be processed in revision files.</p> <p>Vodafone has now completed an audit of ICP 0015723581ELA43 and all unmetered connections have been added to the DUML database and our system. We are currently in the process of working with the relevant parties to update the registry accordingly. This ICP will also be included in Vodafone's second field audit.</p>		March 2022
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		As above.
Remedial action status		
Identified		

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: 15.2 and 15.37B(b) From: 14-Jun-17 To: 15-May-21	Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database. Potential impact: High Actual impact: High Audit history: None Controls: Moderate Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls in place are rated as moderate because there was a wattage calculation, but it was based on incorrect inputs. The impact is assessed to be high based on the under submission of 400,000 kWh per annum.	
Actions taken to resolve the issue		Completion date
<p>On further analysis, we believe our total unmetered kWh values prior to March 2021, will have been in line with the estimated consumption calculated from this audit.</p> <p>We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. As this is unlikely to be a quick process, we have inflated our kWh values for each ICP by 17.5% (from March21) to more accurately reflect the correct volumes in our submissions. Once the correct wattages have been confirmed following Vodafone's second field audit, the corrections will be processed in revision files.</p> <p>Vodafone has now completed an audit of ICP 0015723581ELA43 and all unmetered connections have been added to the DUML database and our system. We are currently in the process of working with the relevant parties to update the registry accordingly. This ICP will also be included in Vodafone's second field audit.</p>		March 2022
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		As above.
Remedial action status		
Identified		

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: 15.2 and 15.37B(c) From: 14-Jun-17 To: 15-May-21	Under submission of 400,000 kWh per annum due to incorrect wattage figures in the database. Potential impact: High Actual impact: High Audit history: None Controls: Moderate Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls in place are rated as moderate because there was a wattage calculation, but it was based on incorrect inputs. The impact is assessed to be high based on the under submission of 400,000 kWh per annum.		
Actions taken to resolve the issue		Completion date	
<p>On further analysis, we believe our total unmetered kWh values prior to March 2021, will have been in line with the estimated consumption calculated from this audit.</p> <p>We will be working with Vodafone to conduct another full field audit to confirm correct wattage details using the correct measurement procedures. As this is unlikely to be a quick process, we have inflated our kWh values for each ICP by 17.5% (from March21) to more accurately reflect the correct volumes in our submissions. Once the correct wattages have been confirmed following Vodafone's second field audit, the corrections will be processed in revision files.</p> <p>Vodafone has now completed an audit of ICP 0015723581ELA43 and all unmetered connections have been added to the DUML database and our system. We are currently in the process of working with the relevant parties to update the registry accordingly. This ICP will also be included in Vodafone's second field audit.</p>		March 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
As above.		As above.	
<th>Remedial action status</th>			Remedial action status
Identified			