

Compliance plan for OurPower – 2021

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 From: 07-Feb-20 To: 05-Aug-21	OURP - Incorrect submission flag for 1 ICP Incorrect status for 1 ICP Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. The audit risk rating is recorded as low because it is only one ICP therefore any impact to the market was minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Identified issues corrected as soon as practical to do so		Sept 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The Reconciliation check report we have added checks for incorrect submission flags and added Checks for ICP incorrect status with consumption		26/08/2021	

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35 From: 01-Mar-20 To: 01-Mar-21	OURP - Late submission files in 2 months 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 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	Remedial action status
Files were submitted promptly once breach was identified.		Pre-August 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes and calendars were updated following the breaches to reduce risk of late submission		Pre-August 2021	

Non-compliance	Description		
Audit Ref: 3.2 With: 11.17(2) From: 28-Jan-20 To: 31-Jul-21	OURP – One ICP has an incorrect type of reconciliation recorded in the registry Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, good management of status information. 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
Flag has been corrected in registry to HHR		August 2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
At Reconciliation time will be picked up by 2.1 Action		26/08/2021	

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Sep-19 To: 15-Jul-21	OURP – Some late status and trader event updates Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	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	Remedial action status
Flags are updated manually as soon as OurPower are notified that the switch is completed in the registry.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Procedure and reporting being reviewed to ensure that flags can be updated as soon as possible after switch completes.		March 2022	

Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: 19 of Schedule 11.1</p> <p>From: 17-Dec-19</p> <p>To: 31-Jul-21</p>	<p>OURP – One ICP has an incorrect “inactive” status recorded in the registry. Volumes are recorded and submitted</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>Controls are recorded as strong, good management of status information. 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
Identified issues corrected as soon as practical to do so		September 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Daily Check on all inactive status with consumption corrected (emailed to Staff)</p> <p>At Reconciliation time will be picked up by 2.1 Action</p>		<p>21/8/21</p> <p>26/8/21</p>	

Non-compliance	Description		
Audit Ref: 4.2 With: 3 of Schedule 11.3 From: 01-Sep-19 To: 15-Jul-21	OURP – 3 late AN 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	Controls are recorded as strong, good management of switching. AN are sent automatically. 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
Identified issues corrected as soon as practical to do so		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Will not happen again as we were rewiring sites as the switch was happening.			

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Sep-19</p> <p>To: 31-Jul-21</p>	<p>OUR – 1 CS file late by one day</p> <p>Incorrect date “Last Read Date” in the CS file created automatically</p> <p>Average daily consumption in CS files does not meet registry functional specification</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>Controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Management of switching is good, average daily consumption in CS file is accurate. Incorrect “Last Read Date” requires change of the Retail system.</p> <p>The impact on settlement and participants is minor because most of traders don’t pay attention to “Last Read Date”; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Average daily consumption provides more accurate measure to new retailer. No action being undertaken.		n/a	Identified
Changed the last date to the correct date in the CS file			
Preventative actions taken to ensure no further issues will occur		Completion date	
Average daily consumption provides more accurate measure to new retailer. No action being undertaken.		5/8/2021	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: 6(1) and 6A of Schedule 11.3</p> <p>From: 01-Sep-19</p> <p>To: 31-Jul-21</p>	<p>OUR – 1 AC file late</p> <p>For 3 ICPs that switched with the estimated reading on WEL Network meters OURP's start read did not match the losing trades CS read</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>Controls are rated as moderate as we consider them sufficient to ensure that all consumption is captured most of the time. The issue relates to a small subset of switches where a WEL Networks meter is used for settlement and is switched to OurPower on an estimated CS reading.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This only happens when we have a WEL meter on site and we use the reads from this not the current MEPs meter readings. This issue is when the other Trader sends incorrect reads, we will drop our RR file limit to stop this			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Drop RR File tolerance.</p> <p>AC process in place since 2020</p>			

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 11 of Schedule 11.3</p> <p>From: 01-Sep-19</p> <p>To: 31-Jul-21</p>	<p>OUR – 2 CS files late</p> <p>Incorrect date “Last Read Date” in the CS file created automatically</p> <p>Average daily consumption in CS files does not meet registry functional specification</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>Controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Management of switching is good, average daily consumption in CS file is accurate. Incorrect “Last Read Date” requires change of the Retail system.</p> <p>The impact on settlement and participants is minor because most of traders don’t pay attention to “Last Read Date”; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Average daily consumption provides more accurate measure to new retailer. No action being undertaken.		5/8/2021	Identified
Incorrect last read date – Fixed in 4.3			
Preventative actions taken to ensure no further issues will occur		Completion date	
Average daily consumption provides more accurate measure to new retailer. No action being undertaken.			

Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: 17 of Schedule 11.3</p> <p>From: 01-Sep-19</p> <p>To: 31-Jul-21</p>	<p>OUR – 2 AW files late</p> <p>1 NW file late</p> <p>Incorrect application of “CX” code, it is almost the only code used, it is hard coded in the Retail system</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	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	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Review of process to identify withdrawals and respond within time.		20/8/2021.	
Update to system to allow user to provide alternative dates			

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Sep-19 To: 31-Jul-21	OPHL/OURP - HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: Many times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	OPHL/OURP submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
None		NA	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
None		NA	

Non-compliance	Description		
Audit Ref: 12.2 With: 15.4 From: 01-Mar-21 To: 30-Apr-21	OURP – late submission files in two months Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are 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	Remedial action status
Files were submitted promptly once breach was identified.		Pre-August 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Processes and calendars were updated following the breaches to reduce risk of late submission.		Pre-August 2021	

Non-compliance	Description		
Audit Ref: 12.7 With: 15.12 From: 01-Jan-20 To: 31-Jul-21	OPHL – one incorrect file OURP – For five ICPs, the start read applied by OurPower was inconsistent with the CS read Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	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	Remedial action status
See 4.4			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See 4.4			

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Nov-19</p> <p>To: 31-Jul-21</p>	<p>OURP- Historical estimates target not met for few revision 3, 7, and 14 for 5 months</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>Controls are recorded as moderate, non-compliance with R3 is and 7 is small (volumes are ever decreasing). More detective controls need to be designed. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The Reconciliation check report added a check for Historical estimates issues</p> <p>This had been done before audit but was not there for the audit period</p>		20/7/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Picked up by Reconciliation Report		27/8/2021	