

Compliance plan for Contact Energy Certified Reconciliation Participant – August 2022

Participants to give access		
Non-compliance	Description	
Audit Ref: 1.11 With: Clause 16A.4 From: 04-May-22 To: 09-Aug-22	CTCT Some information was not provided within 15 business days of the request. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as most information was provided as requested. The audit risk rating is low as the information was eventually provided but this impacted analysis time.	
Actions taken to resolve the issue	Completion date	Remedial action status
AMI data: Contact is reviewing the process and have put more controls in place to ensure data requests are fulfilled within deadlines. The AMI processes changed teams internally and there was a challenge to extract the specific data out of big raw files. Contact is looking further to simplify this process for data extractions for AMI process.	Nov 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
AMI data: Contact is reviewing the process to simplify the data extractions.	Nov 2022	

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-21</p> <p>To: 09-Aug-22</p>	<p>CTCT</p> <p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some previous audit corrections not carried out.</p> <p>CTCS and CTCX</p> <p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some previous audit corrections not carried out.</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. Controls are moderate for the CTCT operation. CTCS and CTCX have made improvements and their controls are now rated as moderate. Areas of improvement have been identified in the report.</p> <p>The impact is high based on the volume differences identified, and that corrected data has not yet been prepared in some instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT</p> <p><u>Active date variance with Initial Electrical Connection Date and/or meter certification date</u></p> <p>Contact is working with the MEPs, Networks, and third-party services providers to resolve exceptions identified during the audit.</p> <p>More users are trained to resolve the exceptions and to focus on audit compliance AC020Trader21 report.</p> <p>We continue to work with our field service providers and MEPs to improve the overall accuracy of the new connection paperwork.</p> <p><u>Active ICPs with metering category 3 or higher with NHH submission flag</u></p> <p>Contact (CTCT) is reviewing the process and has provided further training to the agents for meter upgrade jobs to ensure category 3 or higher are managed under CTCS code, which will improve the accuracy of the submission flag for these scenarios.</p> <p><u>ANZSIC code discrepancies</u></p> <p>Contact has strong reporting in place to identify any ICPs with a "T9" series ANZSIC code applied in the registry. Corrections are</p>		Ongoing	Identified

made via a manual process on a regular basis. We continue to work with our staff to ensure the customer's end use is validated on signup, and the appropriate ANZSIC code is populated from the contract start date. We continue to investigate the opportunity for additional system changes to remove the capability for selecting a 'T9' series ANZSIC code on customer sign-up.

Active ICP with no MEP and unmetered flag set to N

Contact has increased the priority in our Business Process Exception Management System for exceptions raised relating to active ICP with no MEP and unmetered flag is set to N, most of these exceptions are where MEP has accepted the nomination and metering details are still required to be uploaded into the registry. Contact working on providing additional training to back-office staff to pad gaps in their internal processes for cases where metering is physically removed from site due to a physical disconnection, where an inactive status has not been applied in SAP ISU or the Electricity Registry.

Active ICP with meter category 9 or blank and unmetered flag set to N

Contact has increased the priority in our Business Process Exception Management System for exceptions raised relating to active ICP with meter category 9 and unmetered flag is set to N, also we are working on providing additional training to back-office staff to pad gaps in their internal processes for cases where metering is physically removed from site due to a physical disconnection, where an inactive status has not been applied in SAP ISU or the Electricity Registry.

UNM Discrepancies

Contact continues to actively work with our customers and distributors to determine current UNM load details to resolve non-compliances identified.

Our SAP technical team are investigating further opportunities within SAP to create a new BPEM that identifies changes to UML data within the Electricity Registry, so variances in SAP can be updated in a timelier manner.

Contact continues to review the current reporting and processes to identify where any improvements can be made to increase accuracy and ensure corrections are made as soon as practicable.

These reviews have identified some gaps of knowledge internally around the UML space, which we will be filling by, ensuring more resources are trained on UML, and by implementing a QA framework to pick up any agent errors/trends to identify where further development/on-going training is required.

Submission against the RPS profile where the registry has a controlled profile

We continue our efforts to work with the MEPs as the cost to traders, such as Contact, of having to submit controlled load as RPS is significant and we believe also can distort the accurate

<p>application of UFE to all traders. Our focus is now moving to expired certified ICPs now that the population of the 'controlled device certified' flag on the registry is largely accurate.</p> <p><u>Incorrect profiles recorded on the registry</u></p> <p>Contact has strong reporting in place to seize any discrepancies. We are actively working with customers, distributors, and MEPs, to ensure the ICPs identified via our monthly reporting as having incorrect generation related data applied within SAP or the Registry is being investigated/corrected.</p> <p><u>Incorrect status recorded on the registry</u></p> <p>Contact is actively working through all status discrepancies identified via the last RP Audit to ensure the required corrections have been made. Our teams will also be completing a review to find where the data was inaccurate, and that the effected ICPs were picked up in our monthly reporting. Where the scenarios were not picked up, we will identify the reasons why and make the necessary fixes to our monthly mismatch reporting.</p> <p><u>CTCS/CTCX</u></p> <p>These issues are all replicated further down in the audit for their own individual section - Responses to each individual issue have been provided in Sections 2.9 3.5, 3.6, and 3.7. Each remedial action has a specific implementation date.</p>		
<p align="center">Preventative actions taken to ensure no further issues will occur</p>	<p align="center">Completion date</p>	
<p><u>CTCT</u></p> <p>Same as the non-compliance noted above.</p> <p>Responsibilities allocated to the correct teams.</p> <p><u>CTCS/CTCX</u></p> <p>These issues are all replicated further down in the audit for their own individual section - Responses to each individual issue have been provided in Sections 2.9 3.5, 3.6, and 3.7. Each remedial action has a specific implementation date.</p>	<p>Ongoing</p> <p>22/08/2022</p>	

Data transmission	
Non-compliance	Description
<p>Audit Ref: 2.3</p> <p>With: Clause 20 Schedule 15.2</p> <p>From: 01-Dec-21</p> <p>To: 09-Aug-22</p>	<p>CTCS and CTCX</p> <p>Some validated actual readings are not recorded in MADRAS because they are omitted during the data transfer process.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Moderate</p>

	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate. In most cases readings are correctly recorded in MADRAS. The impact is unknown but assessed to be medium because:</p> <ul style="list-style-type: none"> the issue affects all readings on days which are 30 days before the ETL process is run; because the ETL process is usually run weekly, reads are present in MADRAS for most days and the more frequently the process is completed, the higher the risk of missing reads, the issue will only affect historic estimate calculations if the first and/or last reads within each reconciliation period are missing, excluded reads will not be used to calculate historic estimate and could result in inaccurate apportionment of consumption between reconciliation periods and/or forward estimate which differs from actual consumption being submitted. 		
Actions taken to resolve the issue	Completion date	Remedial action status	
<p><u>CTCS/CTCX</u></p> <p>The root cause for most of the material issues identified were addressed via a code change effective 16 May 2022 to the SQL query extracting data from the Datawarehouse.</p> <p>It is expected that the code change detailed in the preventative solutions section will resolve additional issues with correct readings being used to calculate submission information.</p>	<p>Complete</p> <p>31/12/2022</p>	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
<p><u>CTCS/CTCX</u></p> <p>A code change to ensure all readings inserted, removed (unvalidated) or updated, are sent to MADRAS regardless of the date on which the insertion or update was made is being tested and will undergo a material change audit before release.</p>	<p>31/12/2022</p>		

Temporary Electrical Connection of an ICP	
Non-compliance	Description
<p>Audit Ref: 2.10</p> <p>With: Clause 10.33</p> <p>From: 12-Nov-21</p> <p>To: 24-Nov-21</p>	<p>CTCT</p> <p>CTCT was not recorded as the trader on the registry at the time of temporary electrical connection for ICP 0110012765EL031.</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	The controls are rated as strong overall, as this appears to be an isolated occurrence and arrangements were in place with the MEP. The impact is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> Contact continues to review this process and including the process when requests from distributors are received for correct active dates to investigate the issues further. We are training more agents to focus on the accuracy of the active dates.		Nov 2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> Process review when active date change requests are received from distributors.		Nov 2023	

Electrical Connection of Point of Connection	
Non-compliance	Description
Audit Ref: 2.11 With: Clause 10.33A From: 01-Dec-21 To: 30-May-22	<p>CTCT</p> <p>One of the sample of 15 ICPs checked of a possible 132 new metered ICPs had certification details recorded more than five business days after connection.</p> <p>ICP 1002153939UNA83 is a CT site and was certified late.</p> <p>17 of the sample of 20 checked of a possible 251 ICPs reconnected without having metering certified within five business days.</p> <p>Metering for two ICP's was not recertified on unbridging.</p> <p>CTCS</p> <p>Four ICPs were not certified within five business days of connection.</p> <p>One ICP was not recertified within five days of reconnection.</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. Uncertified meters are now identified and notified to MEPs.</p> <p>The audit risk rating is low as a small proportion of ICPs were affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>ICP -0000205989DE103 - MEP confirmed meter still on site and registry is updated now.</p> <p>ICP 0099555145CN863 - ICP confirmed decommissioned, updates are done in SAP and registry status updated.</p> <p>Contact actively communicates with MEPs and field service providers to determine the best way to minimize metering being left un-certified or certified after 5 business days.</p> <p>We have seen steady improvements in this space because of process improvements recently implemented.</p> <p>Despite our recent improvements we would also like to acknowledge that Covid was a key contributor in hindering the MEP's ability to re-certify metering within our SLAs.</p> <p><u>CTCS</u></p> <p>We cannot correct historic timeliness of these updates</p>	<p>Ongoing</p> <p>N/A</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact will continue to improve the process to ensure that all parties involved have enough time to recertify the installation</p> <p><u>CTCS</u></p> <p>Refresher training has been held to ensure that Data Quality and timeliness was a daily priority. Process refreshers were also provided to all team members.</p> <p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control</p>	<p>Ongoing</p> <p>Complete</p> <p>30/11/2022</p>	

Arrangements for metering equipment provision		
Non-compliance	Description	
Audit Ref: 2.13 With: Clause 10.36 From: 01-Dec-21 To: 30-May-22	CTCT No arrangement in place for the maintenance of BOPE metering. 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 controls are rated as strong overall. BOPE meters are displaced as soon as possible. The audit risk rating is low as a small proportion of ICPs were affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u> The audit highlighted that we did not have an efficient process when organizing an unbridged and recertify on this MEPs metering equipment. The issue was discussed when intellihub, who supply a maintenance service on BOPE Meters. They have agreed that our 'Unbridged' service order can be assigned to them to attend, and they will carry out the remedial action. Which is the same process for IHUB and MRTX metering.	18/08/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CTCT</u> ORB service order assignment rules have now been updated	18/08/22	

Meter bridging			
Non-compliance		Description	
Audit Ref: 2.17 With: Clause 10.33C and 2A of Schedule 15.2 From: 01-Dec-21 To: 09-Aug-22		CTCT I tried to check corrections for 15 of the 98 ICPs which had their meters unbridged during the audit period and was unable to confirm that corrections had been accurately processed. Potential impact: Medium Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating		Rationale for audit risk rating	
Medium		The controls are rated as weak, as they are not sufficient to ensure that bridged meter corrections are consistently processed. The audit risk rating is medium based on the number of ICPs with bridged meters identified.	
Actions taken to resolve the issue		Completion date	Remedial action status
CTCT We are currently investigating the opportunities we have within our data and existing reporting to expand our validation checks to include the bridged meter monitoring that has been recommended by Veritek.		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
CTCT Please refer to Actions taken to resolve.		Ongoing	

Provision of information on dispute resolution scheme	
Non-compliance	Description
Audit Ref: 2.19 With: Clause 11.30A From: 01-Dec-21 To: 30-May-22	CTCS – Plains Power brand Not in place for all inbound phone calls. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong overall.</p> <p>The audit risk rating is low as it is only phone calls to Plains Power where the Utilities Disputes message is not played to every caller, but this service is promoted on all other channels.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCS</p> <p>Plains Power are in talks with Spark to move the UD information to the front of the IVR. Spark have come back with high costs for this to be achieved. Currently working with PP to see what can be achieved</p>		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>CTCS</p> <p>When making any future changes to IVR/comms/invoices/emails/website etc will ensure that we review and confirm that the Utilities disputes and Powerswitch info is still relative and compliant</p>		Ongoing	

Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p>	<p>CTCT</p> <p>1,019 late updates to active status.</p> <p>433 late updates to inactive status.</p> <p>1,431 late trader updates.</p> <p>79 ANZSIC code updates were made more than 20 business days after CTCT began trading at the ICP.</p> <p>CTCS</p> <p>Four late updates to active status.</p> <p>Nine late updates to inactive status.</p> <p>63 late trader updates.</p> <p>Three ANZSIC code updates were made more than 20 business days after CTCS began trading at the ICP.</p> <p>CTCX</p> <p>Five late trader updates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p>

From: 02-Dec-21 To: 04-May-22	Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate overall. Some process improvements have been identified above. Overall, the level of compliance is high with the majority of updates being completed within five business days of the event. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u> Contact acknowledges the non-compliances identified and the underlying factors that lead to incorrect or late notifications in the Registry. Where errors or delays are a result of the paperwork returned from the field, we will continue to utilise the contractor performance provisions within our respective agreements to address any concerns and improve the process moving forward.</p> <p><u>CTCS / CTCX</u> We acknowledge that we are unable to rectify the late updates which have already occurred. NB Meetings were held immediately after the Audit to ensure that Data Quality and timeliness was a daily priority. Process refreshers were also provided to all team members.</p>		Ongoing	Identified
<p><u>CTCS / CTCX</u> We acknowledge that we are unable to rectify the late updates which have already occurred. NB Meetings were held immediately after the Audit to ensure that Data Quality and timeliness was a daily priority. Process refreshers were also provided to all team members.</p>		N/A	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u> Where errors or delays are a result of the paperwork returned from the field, we will continue to utilise the contractor performance provisions within our respective agreements to address any concerns and improve the process moving forward. Where necessary, continuous training is being provided to employees and the field service operators to assist in minimising the opportunity for late or incorrect notifications being sent to the Registry.</p> <p><u>CTCS/CTCX</u> Two days each week for all staff members are now dedicated to managing our Field Service Processes. We also anticipate having an extra person in this space in the future.</p>		Ongoing	
		30/11/2022	

<p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control</p> <p>We are also working with our system administrator to improve our current process in Salesforce to assist with timing and actions and to provide the Operations Team Leader visibility to assist and/or add resource where required</p>	<p>30/11/2022</p> <p>31/1/2023</p>	
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Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT</p> <p>Notification was not provided to the MEP prior to decommissioning for four ICPs from a sample of ten.</p> <p>CTCS</p> <p>Notification was not provided to the MEP prior to decommissioning for one ICP from a sample of ten of a possible 11 ICPs.</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	
<p>Low</p>	<p>The controls are moderate overall but there is room for improvement as detailed above.</p> <p>The impact is low as the number of ICPs affected is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT/CTCS</u></p> <p>We have implemented steps (noted in preventative actions below) to further reduce the opportunity for this non-compliance to re-occur in the future.</p>	<p>01/12/2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>MEPs that we do not have a metering service contract with, we organize the decommission and remove meters process via our own field service providers (Currently Delta). They would perform the agreed task and removed meters are returned to the MEP. However, based on the auditor recommendation we</p>	<p>1/12/2022</p>	

<p>will review how we can speed up the MEP removed meter notification process</p> <p>CTCS</p> <p>Two days each week for all staff members are now dedicated to managing our Field Service Processes. We also anticipate having an extra person in this space in the future.</p> <p>We have identified more resource is needed in this space and as a result, we are proactively training another member of the team to assist in this space which will ensure better data quality - Operations Team Lead is also acting as Quality Control</p> <p>We are also working with our system administrator to improve our current process in Salesforce to assist with timing and actions and to provide the Operations Team Leader visibility to assist and/or add resource where required.</p>	<p>30/11/2022</p> <p>30/11/2022</p> <p>31/1/2023</p>	
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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: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT</p> <p>131 late updates to active status and MEP nominations for new connections.</p> <p>79 ANZSIC code updates were made more than 20 business days after CTCT began trading at the ICP.</p> <p>Eight ICPs have incorrect active status dates.</p> <p>CTCS</p> <p>19 late updates to active status for new connections.</p> <p>Three ANZSIC code updates were made more than 20 business days after CTCT began trading at the ICP.</p> <p>Two late MEP nominations for new connections.</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 overall. The rating is strong for CTCT but weak for Simply Energy due to the lack of notification from agents.</p> <p>The audit risk rating is low because the number of ICPs affected overall is small. Late changes to active can result in delays in providing submission information and billing the customer, and incorrect active dates can have an impact on submission data.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p><u>New Connection:</u></p> <p>Contact is working through correcting the data inaccuracies identified during the audit.</p> <p>We currently have robust processes and daily reporting in place to monitor new connections and its associated data and continue to work collaboratively with our field service providers to ensure accurate information is returned to Contact Energy in a timely manner.</p> <p>We have made an excellent improvement to the timeliness of new connection related Registry data (94.64% for this audit period) and are making steady progress to improve the accuracy of this data, however, we do acknowledge there is still room for further improvements to be made, and we will continue to explore these as the opportunity arises.</p> <p><u>ANZSIC Code:</u></p> <p>Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise.</p> <p>The late updates identified by the Auditors were a result of correcting data inaccuracies identified via the above-mentioned reporting.</p> <p>As the root cause of the data inaccuracies are identified, we are actively working to implement further training and or process changes for our front office teams to further assist with decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p> <p><u>CTCS</u></p> <p><u>New Connection:</u></p> <p>Unfortunately, we are unable to resolve the late updates which have already occurred, however, we have implemented steps (noted in preventative actions below) to further reduce the opportunity for these non-compliances from re-occurring in the future.</p> <p><u>ANZSIC Code:</u></p> <p>We continue to review the ANZSIC codes of ICPs that switch-in from other traders to ensure they are complete and accurate, as well as complete periodic reviews of all ICPs and their allocated ANZSIC codes.</p> <p>Some ANZSIC code updates may occur weeks after switching has completed if a more appropriate ANZSIC code is identified during the above-mentioned reviews. As discussed with the</p>	Ongoing	Identified

auditors we are prioritizing the accuracy of this data over the timeliness.	
Preventative actions taken to ensure no further issues will occur	Completion date
<p><u>CTCT</u></p> <p><u>New Connection:</u> We currently have robust processes and daily reporting in place to monitor new connections and its associated data and continue to work collaboratively with our field service providers to ensure accurate information is returned to Contact Energy in a timely manner.</p> <p><u>ANZSIC Code:</u> We currently have robust processes and daily reporting in place to monitor ANZSIC codes applied within our system and the Electricity Registry. As the root cause of ANZSIC code inaccuracies are identified, we will continue to implement and improve reporting, training, and or process changes for our front office teams to further decrease an opportunity for incorrect ANZSIC code related issues from arising.</p>	Ongoing
<p><u>CTCS</u></p> <p><u>New Connection:</u> We have identified more resources are required in this space and as a result, we are proactively training another member of the team which will help increase data quality and timeliness. The Operations Team Lead is also acting as Quality Control in this space.</p> <p><u>ANZSIC Code:</u> Monthly reports are sent to Operations where the ANZSIC code requires further investigation for existing ICP's - Operations works closely with our customer care team to provide the correct codes and we update Registry as soon as we have an improved code confirmed.</p>	30/11/2022 Ongoing

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-Dec-21</p> <p>To: 30-May-22</p>	<p>CTCT</p> <p>Seven (7%) of the 100 ICPs sampled were confirmed to have the incorrect ANZSIC codes applied. These were corrected during the audit period.</p> <p>CTCX</p> <p>One of the 20 ICPs sampled had an incorrect ANZSIC code applied. This was corrected during the audit.</p> <p>CTCS</p> <p>11 (37%) of the 30 ICPs sampled had an incorrect ANZSIC code applied. All related to a group of council ICPs. These were corrected during the audit.</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 overall but there is room for improvement for CTCS codes.</p> <p>The audit risk rating is low because there is no impact on settlement outcomes and a low impact on the Electricity Authority's reporting accuracy.</p>	
Actions taken to resolve the issue		Completion date
<p>CTCT</p> <p>Contact is working through correcting the ANZSIC code inaccuracies identified during the audit.</p> <p>We have steadily been reducing ANZSIC code discrepancies through a variety of clean-up projects as we further refine our onboarding process to reduce the likelihood of future errors occurring. Contact has monthly reporting in place to identify ICPs with an incorrect ANZSIC code applied in the Registry. This reporting is utilised to identify and correct ANZSIC code inaccuracies where they exist, as well as being used to help identify the underlying factors causing the data inaccuracies to arise. As the root cause of the data inaccuracies are identified, we will continue to actively work to implement further training and or process changes for our front office teams to assist in further decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p> <p>CTCS/CTCX</p> <p>All ICPs identified in the audit with an incorrect ANZSIC code applied in the Registry have been corrected.</p>		Complete
		Cleared

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>As the root cause of the data inaccuracies are identified via our monthly reporting or clean-up projects, we will continue to actively work to implement further training and or refine processes for our front office teams to assist in further decreasing the opportunity for incorrect ANZSIC code related issues from arising.</p>	Ongoing	
<p><u>CTCS/ CTCX</u></p> <p>Monthly reports are sent to Operations where the ANZSIC code requires further investigation for existing ICP's - Operations works closely with our customer care team to provide the correct codes and we update Registry as soon as we have an improved code confirmed.</p>	30/11/2022	

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: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT</p> <p>Some incorrect unmetered load information was identified.</p> <p>CTCS</p> <p>Two ICPs with the incorrect unmetered load recorded. This will be resulting in a very minor amount of incorrect submission.</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 currently rated as moderate. Opportunities for improvement have been detailed above.</p> <p>The audit risk rating is low because the impact on settlement is minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact is working through the exceptions identified during the audit.</p> <p>Contact's SAP technical team are investigating further opportunities within SAP to create a new BPEM that identifies changes to UML data within the Electricity Registry.</p>	Dec 2022	Investigating

<p>As these investigations can take some time to complete, we are also looking into what opportunities we have within our existing monthly Registry discrepancy reporting to identify when the removal of UML data from the Registry has not carried across into SAP.</p> <p>We have also provided further training to the users for rounding and decimal related issues which caused some incorrect UML data in SAP.</p> <p>CTCS</p> <p>These two ICPs were corrected (both historic volumes and forward unmetered load estimates) on the Registry and in our DA system in early August 2022. Submissions volumes will be corrected via the usual revision process.</p>	Complete	
<p align="center">Preventative actions taken to ensure no further issues will occur</p>	<p align="center">Completion date</p>	
<p>CTCT</p> <p>Contact are further investigating opportunities we have within our existing reporting and SAP (BPEMs) to improve the identification of UML related discrepancies.</p> <p>Contact will also be putting a priority (more resources, further training, QA reports) towards resolving UNM mismatches identified to ensure these are corrected in a timely manner, as well as increasing the frequency of our UNM mismatch reporting being run to ensure UNM mismatches are identified earlier on in the process.</p>	Dec 2022	
<p>CTCS</p> <p>A review of all unmetered ICPs Trader Unmetered details against daily kWh values will be finalised by 31/8/2022 and any material updates will be backdated to the 14th revision month and all others will be updated from 1/9/2022.</p>	31/8/2022	

Management of "active" status	
Non-compliance	Description
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT</p> <p>Eight new ICPs have incorrect active status dates recorded.</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 with robust checks in place to apply the correct active dates.</p> <p>The audit risk rating is low, as the number of ICPs affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact is working through correcting the data inaccuracies identified during the audit.</p> <p>We currently have robust daily reporting in place to monitor new connections and the accompanying compliance obligations we have. We acknowledge there is still some improvements required in this space, so we have committed to allocating further resources to our new connection reporting to further assist with reducing the non-compliances from arising and the time taken to resolve any non-compliances identified. As the cause of delayed or inaccurate data becomes apparent or frequent, these instances will continue to be addressed via the contractor performance provisions within the respective agreements.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>Contact will be committing further resources to the current new connection reporting which is in place. We will continue to utilize the contractor performance provisions within the respective agreements to address late or incorrect data being returned on paperwork from the field.</p>		Ongoing	

Management of "inactive" status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 21-Dec-20</p> <p>To: 29-Apr-22</p>	<p>CTCT</p> <p>ICP 0000202347UN912 the ICP was disconnected on 21 December 2020, but the disconnection read was not entered until 23 December 2020, resulting in a small amount of volume being over reported. The period was more than 14 months ago and a reconciliation volume correction will not be processed as the change would result in a small negative adjustment.</p> <p>CTCS</p> <p>ICP 0007200667RN539 was consuming energy on 29 April 2022, but has inactive status recorded for that day, resulting in under submission of 14 kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p>

	Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate overall. Most disconnection information checked was processed accurately, but there is room for improvement. The number of ICPs affected is small, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> Smart reads take 48hrs to come through. We believe all consumption was captured and charged once this was received.		Complete	Identified
<u>CTCS</u> This issue was caused by us incorrectly processing a reconnection on the Registry, whereas we should have just reversed the prior traders disconnection (we reconnected the site the same day alt retailer disconnected the site). We have now corrected this on the registry		Complete	
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> Work items with disconnection results are raised the day after a disconnection has been set as completed/not completed and actioned by the Energy Wellbeing Team within 48hrs.		30/11/2022	
<u>CTCS</u> Two days each week for all staff members is now dedicated to managing our Field Service Processes. We also anticipate having an extra person within this space in the future. A task has been added to the regular monthly compliance schedule to ensure all inactive ICPs are reviewed to ensure there is no consumption; and where an ICP has been inactive for longer than 12 months without a reading, a special manual reading will be requested.			

Losing trader must provide final information - standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3	<u>CTCT</u> Nine CS breaches.

<p>From: 21-Dec-21 To: 21-Apr-22</p>	<p>One E2 breach.</p> <p>Four of a sample of five of a possible 594 ICPs were incorrectly sent with an average daily consumption of zero kWh.</p> <p>One of a sample of five ICPs was sent with an incorrect very high average daily consumption of 50,011 kWh.</p> <p>Four transfer switches had an incorrect last read date.</p> <p>One transfer switch had an estimated read type recorded but should have had actual.</p> <p>One transfer switch had an incorrect last actual read date and was later withdrawn.</p> <p>One ICP of a sample of five sent with the incorrect last read type and date.</p> <p>CTCS</p> <p>One transfer switch had an estimated read type recorded but should have had actual.</p> <p>One transferred ICP sent with the incorrect last read of 9120 but should have been 9127, resulting in 7 kWh being pushed to the gaining trader. This was due to an error in the SQL script being used to process bulk switch outs. This error started in January 2022 but was not identified and corrected until June 2022.</p> <p>One of the five transferred ICPs sampled sent with the incorrect last read of 190256 but should have been 190192, resulting in 64 kWh of over submission. The average daily consumption figure was calculated incorrectly and the last read date was incorrect.</p> <p>Two switch moves sent with an incorrect average daily consumption figure.</p> <p>Potential impact: Medium</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 recorded as moderate overall. Accuracy has improved since the last audit but Simply Energy's work around processes to produce CS files is manual and the SQL script had an error which was not identified for six months.</p> <p>The audit risk rating is assessed to be low based on the impact on settlement discrepancies detailed above but this could be higher as the number of ICPs sent with the incorrect estimated reads during the period where the SQL script was incorrect is unknown.</p>		
Actions taken to resolve the issue	Completion date	Remedial action status	
<p><u>CTCT</u></p> <p>Nine CS breaches and One E2 breach:</p> <p>Contact has implemented the process change to reduce the re-occurrence while in the process of investigating to find a more robust reporting solution. Further training has been provided to the agents to better identify these scenarios in current reporting.</p>	April 2023	Investigating	

<p>Four of a sample of five of a possible 594 ICPs were incorrectly sent with an average daily consumption of zero kWh:</p> <p>Contact ICT is working through to implement the solution. System change was implemented in April 2021 but there is one pending complex issue team is still working through.</p> <p>The solution is in the testing phase and expected to be implemented by November 2022.</p> <p>Four transfer switches had an incorrect last read date:</p> <p>One transfer switch had an estimated read type recorded but should have had actual:</p> <p>One transfer switch had an incorrect last actual read date and was later withdrawn:</p> <p>One ICP of a sample of five sent with the incorrect last read type and date:</p> <p>Once average daily consumption change is implemented in the system, ICT resources are going to be allocated to these non-compliances to develop the solutions, expected to be resolved by April 2023.</p> <p><u>CTCS</u></p> <p>We feel the issues identified were not deemed material enough to require correcting - in the case of incorrect reads, these fall within the 200kwh limit set in the code.</p>	<p>N/a</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCT</u></p> <p>Contacts SAP technical team is investigating the issues and working on possible solutions. Further training has been provided to the agents to better identify the issues in current reporting.</p> <p><u>CTCS</u></p> <p>Our Mass Switch Out Process has been reviewed and subsequently updated/improved. This has included adding an audit layer to the model for future management.</p> <p>Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations Team Lead will run regular tests to review data quality in the interim.</p>	<p>April 2023</p> <p>Complete</p> <p>30/9/2023</p>	

Retailers must use same reading - standard switch			
Non-compliance		Description	
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 02-Dec-21 To: 04-May-22		CTCT The reading in SAP for one ICP did not reflect the outcome of the RR process and was corrected during the audit. 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 controls are rated as strong and will mitigate risk to an acceptable level. The impact assessed to be low as only one ICP was affected.	
Actions taken to resolve the issue		Completion date	Remedial action status
CTCT ICP was corrected during the audit. Further training has been provided to our staff to reduce the opportunity for this non-compliance to re-occur in future.		Aug 2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
CTCT Further training has been provided to our staff to reduce the opportunity for this non-compliance to re-occur in future.		Aug 2022	

Gaining trader informs registry of switch request - switch move	
Non-compliance	Description
Audit Ref: 4.7 With: Clause 9 of Schedule 11.3 From: 21-Dec-21	CTCT One of a sample of 15 switch move ICPs incorrectly sent with the wrong switch type. CTCS Three of the sample of five switch move ICPs incorrectly sent with the wrong switch type. Potential impact: None Actual impact: None Audit history: Multiple times Controls: Strong

To: 21-Apr-22	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong and mitigate risk to an acceptable level.</p> <p>The impact is assessed to be low as this would have a greater customer and reconciliation impact if a switch move was not issued in these situations.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact has strong controls and robust process in place to assign the correct switch types. MI switch was assigned due to customer in contract with alternate retailer and required specific switch date which is not possible to achieve with current settings of TR switch.</p> <p>This limitation with the Transfer switch has been raised with Electricity Authority through the Switch process review via Switching Technical Group.</p> <p><u>CTCS</u></p> <p>We cannot correct these historic issues</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>This limitation with the Transfer switch has been raised with Electricity Authority through the Switch process review via Switching Technical Group.</p> <p><u>CTCS</u></p> <p>Refresher training has been provided to ensure that Data Quality and timeliness was a daily priority. Process refreshers were also provided to all team members. Operations Team Lead is also acting as quality control.</p> <p>Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations Team Lead will run regular tests to review data quality in the interim.</p>		<p>Ongoing</p> <p>Complete</p> <p>30/9/2023</p>	

Losing trader provides information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1)</p> <p>Schedule 11.3</p>	<p>CTCT</p> <p>Seven ICPs had event dates more than ten business days after the NT receipt date, including five ET breaches.</p> <p>Three AN files sent with the incorrect AN code of MU “unmetered supply”.</p> <p>Potential impact: Low</p>

From: 14-Dec-21 To: 26-Apr-22	Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as they will mitigate risk to an acceptable level. The audit risk rating is low because impact on settlement and participants is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>Seven ICPs had event dates more than ten business days after the NT receipt date, including five ET breaches:</p> <p>Contact applied the same proposed switch date, which was in the NT file from alternate retailer, however the NT files proposed date was more than 10 business days in the future. All the concerned switches were withdrawn.</p> <p>We are working with our ICT team to improve our system logic to strengthen this control.</p> <p>Three AN files sent with the incorrect AN code of MU “unmetered supply”:</p> <p>Contact has robust hierarchy processes in place to assign the AN codes. Incorrect codes “MU” were sent due to a timing issue. The ICP’s had just switched-in to Contact, then were switching back-out, without there being enough time for metering to be setup in our system.</p>	April 2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCT</p> <p>Contact's SAP technical team are working to identify/develop a solution.</p>	April 2023	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p>	<p>CTCT</p> <p>Two of a sample of five of a possible 5,307 ICPs were sent with an incorrect average daily kWh of zero.</p> <p>All eight sampled of a possible 42 ICPs sent with a very high average daily kWh figure.</p> <p>Four of a sample of five switch moves of a possible 14 had an estimated read type recorded but should have had actual.</p>

<p>From: 01-Dec-21 To: 22-May-22</p>	<p>Seven ICPs had an incorrect last actual read date. One switch move had no reads sent.</p> <p>CTCX</p> <p>One of the four CS files sent with an estimated read instead of an actual due to human error.</p> <p>CTCS</p> <p>All five ICPs sampled of a possible 15 where the last actual read date is the day before the event date and estimated switch read type was sent found multiple errors. Some were due to human error and two incorrect final estimated reads were sent due to an error in the SQL query.</p> <p>Four ICPs where the last actual read date is more than one day before the switch event date sent with an actual read were checked and found multiple errors. Some were due to human error and three incorrect final estimated reads were sent due to an error in the SQL query.</p> <p>One ICP sent with a last read date on the day of the switch event.</p> <p>Three of a sample of a possible 143 ICPs sent with an incorrect high average daily consumption value.</p> <p>One ICP sent with a negative average daily consumption figure.</p> <p>Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate overall. Accuracy has improved since the last audit but Simply Energy's work around processes to produce CS files is manual and the SQL script had an error which was not identified for six months.</p> <p>The audit risk rating is assessed to be low based on the impact on settlement discrepancies detailed above but this could be higher as the number of ICPs sent with the incorrect estimated reads during the period where the SQL script was incorrect is unknown.</p>		
Actions taken to resolve the issue	Completion date	Remedial action status	
<p><u>CTCT</u></p> <p>Two of a sample of five of a possible 5,307 ICPs were sent with an incorrect average daily kWh of zero:</p> <p>Contacts SAP technical team is working through to implement the solution. System change was implemented in April 2021 but there is one pending complex issue team is still working through.</p> <p>The solution is in the testing phase and expected to be implemented by November 2022.</p>	April 2023	Investigating	

<p>All eight sampled of a possible 42 ICPs sent with a very high average daily kWh figure:</p> <p>Contact has provided further training to the agents to ensure correct action has been taken to resolve the implausible reads and will be working with our SAP technical team to investigate and develop the solution for register clock-over issue in some specific cases.</p> <p>Four of a sample of five switch moves of a possible 14 had an estimated read type recorded but should have had actual.</p> <p>Seven ICPs had an incorrect last actual read date.</p> <p>One switch move had no reads sent:</p> <p>Once average daily consumption change is implemented in the system, ICT resources are going to be allocated to these non-compliances to develop the solutions, expected to be resolved by April 2023.</p> <p><u>CTCS/CTCX</u></p> <p>We feel the issues identified were not deemed material enough to require correcting proactively, however we will accept an RR if one is received.</p>	N/A	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>SAP technical team is developing the solutions and ongoing training for the agents.</p> <p><u>CTCS/CTCX</u></p> <p>Our Mass Switch Out Process has been reviewed and subsequently updated/improved. This has included adding an audit layer to the model for future management.</p> <p>Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations Team Lead will run regular tests to review data quality in the interim.</p>	<p>April 2023</p> <p>Complete</p> <p>30/9/2023</p>	

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-Dec-21</p>	<p>CTCT</p> <p>Two late RR files for switch moves.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p>

To: 22-May-22	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong and will mitigate risk to an acceptable level. The impact assessed to be low as only two RR files were sent late.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCT</u> Contact has strong controls in place around the RR process. RRs were late due to a delay in obtaining the two actual reads. Late RRs were required to ensure accuracy and correct billing to the customers. Some of these delays are unfortunately unavoidable due to access issues to the meter.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<u>CTCT</u> Please refer to 'Actions taken to resolve the issue'.		Ongoing	

Gaining trader informs registry of switch request - gaining trader switch			
Non-compliance	Description		
Audit Ref: 4.12 With: Clause 14 Schedule 11.3 From: 01-Jan-22 To: 24-Apr-22	CTCS Two gaining trader switches backdated more than 90 days without the losing trader's agreement. 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 rated as moderate but there is room for improvement. The audit risk rating is low, as backdated switches were accepted by the losing trader so there was no impact to any other participants.		
Actions taken to resolve the issue		Completion date	Remedial action status
<u>CTCS</u> We feel the issues identified were not deemed material enough to require any correction, as switches were accepted.		N/a	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCS</p> <p>We have added a step in our switching process that will allow team members to identify all backdated switches that are greater than 90 days, where they receive a prompt to proactively email the losing retailer to gain acceptance.</p> <p>This process will be included in our phase 2 switching automation, currently scheduled for 2023</p>	<p>Complete</p> <p>30/9/2023</p>	

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 15-Dec-21</p> <p>To: 28-Apr-22</p>	<p>CTCT</p> <p>Three NWs did not have the code with the best fit applied.</p> <p>21 SR breaches.</p> <p>60 NA breaches.</p> <p>CTCS</p> <p>One SR breach.</p> <p>Five NA breaches.</p> <p>Three NWs did not have the code with the best fit applied.</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	
<p>Low</p>	<p>The controls are moderate overall, a small number of NW files did not have the NW code with the best fit applied and a small number of files were late.</p> <p>The audit risk rating is low because impact on settlement and participants is minor. Revised reconciliation data will be provided through the revision process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCT</p> <p>Contact will provide ongoing training for the operators involved in our switching processes to ensure correct NW code is applied in all instances.</p> <p>We do feel that late NWs often involve a lengthy and complex investigation, which can also result in delays that are inevitable.</p> <p>CTCS</p>	<p>Ongoing</p>	<p>Identified</p>

These historic issues cannot be corrected		
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT Contact will provide ongoing training for the operators involved in our switching processes to ensure correct NW code is applied in all instances	Ongoing	
CTCS Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations Team Lead will run regular tests to review data quality in the interim.	30/9/2023	

Metering information	
Non-compliance	Description
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCX</p> <p>One of the four CS files sent with an estimated read instead of an actual due to human error.</p> <p>CTCS</p> <p>One transferred ICP and all five ICPs sampled of a possible 15 switch moves where the last actual read date is for the date before the switch event date were sent with the incorrect read type of "E" due to human error.</p> <p>Two transferred ICP and five switch move ICPs sent with the incorrect last read.</p> <p>One switch move CS file (0370679563LCE37) had a last actual read date on the event date and an estimated switch event read type due to human error.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times 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 recorded as moderate overall. Accuracy has improved since the last audit but Simply Energy's work around processes to produce CS files is manual and the SQL script had an error which was not identified for six months.</p> <p>The audit risk rating is assessed to be low based on the impact on settlement discrepancies detailed above but this could be higher as the number of ICPs sent with the incorrect estimated reads during the period where the SQL script was incorrect is unknown.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCX/CTCS</u></p> <p>We feel the issues identified were not deemed material enough to require correcting.</p>	n/a	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p><u>CTCX/CTCS</u></p> <p>Our Mass Switch Out Process has been reviewed and subsequently updated/improved. This has included adding an audit layer to the model for future management.</p> <p>Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations Team Lead will run regular tests to review data quality in the interim.</p>	<p>Complete</p> <p>30/9/2023</p>	

Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 11.4</p> <p>From: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT</p> <p>Five ICPs with the incorrect shared unmetered load value recorded.</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	
<p>Low</p>	<p>The controls are currently rated as moderate. These will move to strong when CTCT is able to identify when unmetered load is removed in a timelier way.</p> <p>The audit risk rating is low because the impact on settlement is very minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact continues to actively work with our customers and distributors to determine current UML details (including shared UML) to resolve non-compliances identified.</p> <p>Our SAP technical team are investigating further opportunities within SAP to create a new BPEM that identifies changes to UML data within the Electricity Registry, so variances in SAP can be updated in a timelier manner.</p>	Dec 2022	Investigating

<p>Contact continues to review the current reporting and processes to identify where any improvements can be made to increase accuracy and ensure corrections are made as soon as practicable.</p> <p>These reviews have identified some gaps of knowledge internally around the UML space, which we will be filling by, ensuring more resources are trained on UML, and by implementing a QA framework to pick up any agent errors/trends to identify where further development/on-going training is required.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>Contact are further investigating opportunities we have within our existing reporting and SAP (BPEMs) to improve the identification of UML (including shared UML) related discrepancies.</p> <p>Contact will also be putting a priority (more resources, further training, QA reports) towards resolving UML (including shared UML) mismatches identified to ensure these are corrected in a timely manner, as well as increasing the frequency of our UML mismatch reporting being run to ensure UML mismatches are identified earlier on in the process.</p>	Dec 2022	

Distributed unmetered load	
Non-compliance	Description
<p>Audit Ref: 5.4</p> <p>With: Clause 11 of schedule 15.3</p> <p>From: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT and CTCS</p> <p>The monthly database extracts used to derive submission from are provided as a snapshot and do not track changes at a daily basis as required by the code.</p> <p>Inaccurate submission information for ten of the databases managed.</p> <p>Some streetlight audits were not submitted by the due date.</p> <p>One streetlight audit overdue.</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 in place mitigate risk most of the time, therefore the control rating is moderate.</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	Remedial action status
<p><u>CTCT</u> Contact are in the process of switching the remaining DUML sites across to CTCS to ensure all DUML ICPs are managed in one system.</p> <p><u>CTCS</u> Discrepancies found in audits are discussed with clients promptly and work plans created to resolve discrepancies. We are also in the progress of migrating the CTCT DUML ICPs to CTCS to have all Contact's DUML ICPs managed in one system</p>	<p>Proposed or actual date</p> <p>Ongoing</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u> Please refer to the 'Actions taken to resolve the issue'.</p> <p><u>CTCS</u> We continue to work with clients to improve the accuracy of their databases and reporting that will flow through into improved submission accuracy. This includes transitioning to the new dimming profile(s) where appropriate, which is the most material issue affecting submission.</p>	<p>Proposed or actual date</p> <p>Ongoing</p>	

Electricity conveyed & notification by embedded generators	
Non-compliance	Description
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 01-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCT</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 112 ICPs.</p> <p>Seven generating ICPs present in the last audit still to have I flow metering installed and electricity is not quantified according to the code.</p> <p>Two generation ICPs 0000034267CH514 and 0000034351CHA67 still to have I flow metering installed and electricity is not quantified according to the code.</p> <p>CTCS</p> <p>ICPs 0005093997HBEBB and 0005093997HBEBB are believed to be grid connected generation but are not being gifted or any generation settled as there is no injection metering present.</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>Controls are rated as moderate as they are sufficient to reduce the risk most of the time.</p> <p>The audit risk rating is low. Bridging only occurs where a soft reconnection cannot be performed after hours, and the customer urgently requires their energy supply for health and safety reasons.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u></p> <p><u>Distributed Generation:</u></p> <p>ICP 0000248388UN4F6 & ICP 0000041994HB938 & ICP 0000936754TU1FC & ICP 0221906002LC12A, a follow up is still in progress with the customer.</p> <p>ICP 0000158386UN338, Registry has been updated.</p> <p>ICP 0419595066LC60F, Tesla battery, a follow up is still in progress with the customer.</p> <p>ICP 0000932060TE629 & ICP 0000029673CH073, the network has amended the installation type to L.</p> <p>0328364045LC58B, vacant property.</p> <p>ICP 0000712396HB728, a job has been raised to installed DG meter on site.</p> <p>ICP 0001409185UNC41 & ICP 0000053221CP0F6, the profile code has been amended from PV1 to EG1</p> <p>A new report has been implemented to check the profile codes that are aligned with the fuel type where fuel type is not solar.</p> <p><u>CTCS</u></p> <p>We are confirming with our customers whether the Generation is meant to be gifted. We also checked with the Reconciliation Manager who holds the Gifting Register and these did not appear. Decision will be made by end of August whether ICPs are added to the gifting register, or require a meter change so I flow is recorded and reconciled.</p>	<p>Ongoing</p> <p>31/10/2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p><u>Distributed Generation:</u></p> <p>Contact has made steady improvements to distributed generation exceptions since the last audit. We are actively working with our customers and distributors to determine distributed generation details to resolve these non-compliances. Contact will ensure any future non-compliances will be actioned as part of our monthly reconciliation process.</p>	<p>Ongoing</p>	

<p>CTCS</p> <p>We are developing a process to identify any ICPs that have generation but no corresponding I flow, so these can be managed proactively with clients</p>	<p>31/8/2022</p>	
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Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clauses 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Mar-21</p> <p>To: 26-Jul-22</p>	<p>CTCS and CTCX</p> <p>Meter condition information is not routinely reviewed to identify issues with seals, tampering, phase failure or safety.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as weak because they are unlikely to mitigate risk most of the time.</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>CTCS/CTCX</p> <p>Historically we did not receive Meter condition information from our meter read provider.</p>		<p>Identified</p>	
Preventative actions taken to ensure no further issues will occur	Completion date		
<p>CTCS/CTCX</p> <p>We changed meter read providers to Wells effective 1/7/22. We now receive a monthly report from Wells containing the Meter condition information which is reviewed and actioned by the Ops team.</p>	<p>Ongoing</p>		

NHH meter reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 02-Dec-21</p> <p>To: 04-May-22</p>	<p>CTCX</p> <p>One of the four CS files sent with an estimated read instead of an actual due to human error.</p> <p>CTCS</p> <p>One transferred ICP and all five ICPs sampled of a possible 15 switch moves where the last actual read date is for the date before the switch event date were sent with the incorrect read type of "E" due to human error.</p> <p>Two transferred ICP and five switch move ICPs sent with the incorrect last read.</p> <p>One switch move CS file (0370679563LCE37) had a last actual read date on the event date and an estimated switch event read type due to human error.</p> <p>The meter upgrade for 0000151826WA0E5 was incorrectly processed, and corrected during the audit.</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 recorded as moderate overall. Accuracy has improved since the last audit but Simply Energy's work around processes to produce CS files is manual and the SQL script had an error which was not identified for six months.</p> <p>The audit risk rating is assessed to be low based on the impact on settlement discrepancies.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCX/CTCS</u></p> <p>The meter upgrade for 0000151826WA0E5 was corrected during the audit.</p> <p>We feel the remaining issues identified were not deemed material enough to require correcting.</p>	<p>Complete</p> <p>N/a</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCX/CTCS</u></p> <p>Our Mass Switch Out Process has been reviewed and subsequently updated/improved. This has included adding an audit layer to the model for future management.</p> <p>Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations</p>	<p>Complete</p> <p>30/9/2023</p>	

Team Lead will run regular tests to review data quality in the interim.		
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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-Oct-20</p> <p>To: 05-Apr-22</p>	<p>CTCS</p> <p>For at least ten ICPs unread during the period of supply, exceptional circumstances did not exist, and the best endeavours requirement was not met.</p> <p>The meter read compliance process begins after 130 days with no readings so it is unlikely compliance will be achieved where the period of supply is less than 130 days.</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>Controls are rated as moderate as they have improved during the audit period, and all unread ICPs are now reviewed monthly, and contact with the customer or MEP is initiated.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>CTCS</p> <p>This is a historical issue where no process was in place, which has since been resolved.</p> <p>We have since created a process (started in Feb 22) where any unread meter >3 months is sent and actioned by our Support team. This involves them contacting the customer via email on the first attempt and a phone call if a 2nd attempt is required to gain and update access details to assist the meter readers in successfully obtaining an accurate meter read.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>CTCS</p> <p>Monthly reports are received from Wells and actioned by the support team using this process. We also have reports in Salesforce that highlight unread meters which we use. We are also in the process of setting up the ability for us to raise a "Special meter read". This will speed up the process of us being</p>		<p>Date</p> <p>Ongoing</p>
Remedial action status		
Identified		

able to send a meter read back to a site to gain an actual read when we receive access information from a customer.		
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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-21</p> <p>To: 31-Mar-22</p>	<p>CTCS</p> <p>For at least 20 ICPs unread in the 12 months ending 31 March 2022, exceptional circumstances did not exist, and the best endeavours requirement was not met.</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>Controls are rated as moderate as they have improved during the audit period, and all unread ICPs are now reviewed monthly, and contact with the customer or MEP is initiated.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCS</p> <p>This is a historical issue where no process was in place, which has since resolved.</p> <p>We have since created a process (started in Feb 22) where any unread meter >3 months is sent and actioned by our Support team. This involves them contacting the customer via email on the first attempt and a phone call if a 2nd attempt is required to gain and update access details to assist the meter readers in successfully obtaining an accurate meter read. As the new process came in place Feb 22 some of these ICPs only had 1 attempt via email to gain access.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCS</p> <p>Monthly reports are received from Wells and actioned by the support team using this process. We also have reports in Salesforce that highlight unread meters which we use. We are also in the process of setting up the ability for us to raise a "Special meter read". This will speed up the process of us being</p>	Ongoing	

able to send a meter read back to a site to gain an actual read when we receive access information from a customer.		
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NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 01-Dec-21</p> <p>To: 31-Mar-22</p>	<p>CTCS</p> <p>For at least ten ICPs unread in the four months ending 31 March 2022, exceptional circumstances did not exist, and the best endeavours requirement was not met.</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>Controls are rated as moderate as they have improved during the audit period, and all unread ICPs are now reviewed monthly, and contact with the customer or MEP is initiated.</p> <p>The impact on settlement and participants is expected to be minor therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>CTCS</p> <p>This is a historical issue where no process was in place, which has since been resolved.</p> <p>We have since created a process (started in Feb 22) where any unread meter >3 months is sent and actioned by our Support team. This involves them contacting the customer via email on the first attempt and a phone call if a 2nd attempt is required to gain and update access details to assist the meter readers in successfully obtaining an accurate meter read. As the new process came in place Feb 22 some of these ICPs only had 1 attempt via email to gain access.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCS</p> <p>Monthly reports are received and we also have a monthly meeting with Wells to discuss HSE, reading limitations (i.e. sickness/vacancies) and attainment rate. This will provide us with greater visibility of potential unread sites and enable us to monitor and drive performance/attainment upward.</p>	Ongoing	

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 02-Dec-21 To: 04-May-22	CTCS Two transfer switch ICPs and all five ICPs sampled of a possible 15 switch move ICPs, had incorrectly labelled switch event meter readings. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate overall as a small number of switch event readings were incorrectly labelled for CTCS. The impact on settlement and participants is low. Applying the read type "E" does not impact on other traders' ability to issue read renegotiation requests under clause 6(2) and (3) Schedule 11.3, and the read values were correct so there is no impact on settlement or the customer.	
Actions taken to resolve the issue	Completion date	Remedial action status
CTCS These historic issues are unable to be corrected.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCS Our Mass Switch Out Process has been reviewed and subsequently updated/improved. This has included adding an audit layer to the model for future management. Our Mass switch process will be automated in Phase 2 of the switching automation, currently scheduled for 2023. Operations Team Lead will run regular tests to review data quality in the interim.	Complete 30/9/2023	

Meter data used to derive volume information	
Non-compliance	Description
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2	CTCS and CTCX AMS and EDMI's EIEP3 file format may round the trading period data to two decimal places if the meter does not have a multiplier and the volume for that hour has a non-zero value in the third decimal place.

From: 01-Mar-21 To: 09-Aug-22	Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	For HHR data, the controls are rated as moderate because data includes all decimal places provided for most ICPs. 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.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCS/CTCX</u> AMS and EDMI effective 1/7/2022 are now sending EIEP3 files with 3 dp.	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17(4)(f)&(g) of schedule 15.2 From: 01-Mar-21 To: 09-Aug-22	CTCT, CTCS and CTCX Full AMI meter event logs provided by MEPs are not routinely reviewed. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because event information is only dealt with if the MEP sends additional correspondence. The impact is low, because any events requiring action identified by the MEPs and sent to Contact are reviewed and actioned.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CTCT</u>	April 2023	Investigating

<p>Contact is investigating opportunities within our systems to build/implement a new process to review full AMI meter event logs provided by the MEPs, and flag all events which require investigation and a corrective action.</p> <p>We already have a process in place where MEP event logs which require actions are reviewed and resolved accordingly.</p> <p><u>CTCS/CTCX</u></p> <p>This is on our roadmap to be addressed this financial year.</p>	31/3/2023	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u></p> <p>System/process build in progress to start reviewing full AMI meter event logs.</p> <p><u>CTCS/CTCX</u></p> <p>A solution will be built in our new Data Warehouse in this current Financial year</p>	April 2023	
	31/3/2023	

Calculation of ICP days	
Non-compliance	Description
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: 01-Jul-21</p> <p>To: 09-Augr-22</p>	<p>CTCT</p> <p>TENC-TML0011 and TENC-TNP0011 had incorrect ICP days reported for March 2022 revision 1.</p> <p>25 revision differences were caused by inaccurate ICP days submission data because incorrect settlement unit information was recorded in SAP. The errors were corrected by the time that the audit was complete except for ICP 1001153745CK57D which was disconnected on 21 September 2021 and reconnected on 22 September 2021. The registry reflects the correct disconnection and reconnection dates, but SAP is active for the whole period resulting in over reporting of one day.</p> <p>CTCS</p> <p>Incorrect ICP days were reported for BRY0661 and ISL0661 in July and August 2021 because an NSP change for ICP 0007173300RN6EB did not have boundary readings entered. The net difference for the balancing area was zero.</p> <p>HHR ICP days were under reported for one day in August 2021 for MNG0331 for ICP 0301589534LC9D5 because one HHR read was not validated and an estimated reading was not inserted.</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		
<p>Low</p>	<p>The controls are rated as moderate overall. For CTCT workarounds are in place to identify and correct ICPs with missing or incorrect settlement units and submission types, but they are not always resolved prior to submission.</p> <p>The impact is assessed to be low because corrected data will be washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u></p> <p>Contact will continue with submission data validation to identify and fix the discrepancy to mitigate the risk of incorrect submission.</p> <p><u>CTCS</u></p> <p>The absence of reads on ICP 0007173300RN6EB contributed to the incorrect ICP days reporting as we chose not to create estimate boundary reads for a change that has no effect on NSP; a read has now been received and this is now resolved.</p> <p>A historical read file was imported late in the submission file process that unvalidated the HHR data for ICP 0301589534LC9D5. To ensure timeliness for RM deadlines, we agreed to resolve in the next submission. This issue has been resolved in our system and will be reflected in the R14 submission due in two months time.</p>		<p>Pre-submission.</p> <p>Complete</p> <p>Complete</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u></p> <p>A ticket will be raised for the issues to be investigated by SAP analysts. The Reconciliation team will continue picking up the ICPs in error through their validation processes.</p> <p>Registry Analyst will liaise with the Energy Reconciliation Analysts to review current monthly Registry reporting to identify where improvements can be made. TNP0011 will be used as an example during this review to identify possible improvements/discrepancies that are detrimental to the settlement processes flowing as smoothly as possible, i.e. increase frequency to ensure discrepancies are identified and resolved in a timelier fashion.</p> <p><u>CTCS</u></p> <p>The work on obtaining reads for all ICPs within 12 months will reduce the risk of ICP Days mis reporting due to NSP Changes.</p> <p>Revision files are run multiple times including the start of BD13, people action any issues asap so that we are submitting as accurate as possible on washup submissions. We now have a</p>		<p>Ongoing</p> <p>Ongoing</p>	

much earlier cut off for resolving issues than previously to ensure we meet the strict 4pm deadline.		
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HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 15-Oct-20 To: 24-Mar-22	CTCT ICP 0314801030LCF84 had its volume submitted against PEN0221 instead of PEN0331. The change of NSP effective 15 October 2020 on 15 October 2020 was not successfully loaded in SAP, and the NSP mismatch was not detected and corrected until 24 March 2022 when it was found through the reconciliation team's GR090 validation. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, as the ICP missing reports are reviewed every two months. The impact is low, because both NSPs are within the same balancing area and revised submission information will be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
CTCT Contact is reviewing the current reporting to identify where any improvement can be made to increase accuracy and ensure correction are made as soon as practicable.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT The Registry Analyst and Reconciliation team will review their current monthly reporting to identify opportunities for improvement.	Ongoing	

Creation of submission information	
Non-compliance	Description
Audit Ref: 12.2 With: Clause 15.4	CTCT

<p>From: 07-Oct-20 To: 09-Aug-22</p>	<p>Four ICPs had missing unmetered load settlement units, which prevented unmetered load being submitted. The missing settlement units were added during the audit and correct submission data will be washed up.</p> <p>Some ICPs were missing from submissions due to data inaccuracies.</p> <p>Some corrections identified in the previous audit not corrected and are now outside the revision cycle.</p> <p>I tried to check corrections for 15 of the 98 ICPs which had their meters unbridged during the audit period and was unable to confirm that corrections had been accurately processed.</p> <p>The meter for 0000435644TP635 had stopped but a correction for consumption during the faulty period was not processed after the meter was removed. A correction was processed during the audit.</p> <p>CTCS</p> <p>One ICP did not have consumption during an inactive period reported.</p> <p>Two ICPs had missing unmetered load information.</p> <p>One HHR ICP had its estimate removed and not replaced with a validated reading resulting in under submission of one day of consumption and one ICP day.</p> <p>Some corrections identified in the previous audit not corrected and are now outside the revision cycle.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
<p>Audit risk rating</p>	<p>Rationale for audit risk rating</p>		
<p>Medium</p>	<p>The controls are rated as moderate overall. Improvements are required to some of the controls.</p> <p>The impact is medium based on the volume differences identified, and corrected data will be provided through the revision process.</p>		
<p>Actions taken to resolve the issue</p>	<p>Completion date</p>	<p>Remedial action status</p>	
<p>CTCT :</p> <p>Contact will continue to provide ongoing training for the operators and continuous discussion with MEPs and field contractors to improve the quality of the paperwork.</p> <p>CTCS</p> <p>ICP 0007200667RN539 had 14 kWh of inactive consumption under reported for 29 April 2022. The Registry has been updated now and the disconnection event has been reversed. This ICP is now active from original switch in date and all consumption billed and reconciled.</p>	<p>Ongoing</p> <p>Complete</p> <p>Complete</p>	<p>Identified</p>	

<p>Both unmetered issues were resolved in the audit.</p> <p>A historical read file was imported late in the submission file process that unvalidated the HHR data for ICP 0301589534LC9D5 and due to time constraints at the time we chose to prioritise meeting the 4pm deadline over attempting to resolve (due to recent activity and breach notices, timeliness unfortunately now takes precedence over Accuracy if we have any late issues that require resolution). This issue has been resolved in our system and will be reflected in the R14 submission due in two months time.</p>	Complete	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>CTCT</p> <p>Contact will continue to provide ongoing training for the operators and continuous discussion with MEPs and field contractors to improve the quality of the paperwork.</p>	Ongoing	
<p>CTCS</p> <p>A task has been added to the regular monthly compliance schedule to ensure all inactive ICPs are reviewed to ensure there is no reported consumption; and where an ICP has been inactive for longer than 12 months without a reading, a special manual reading will be requested.</p>	Ongoing	
<p>A review of all unmetered ICPs Trader Unmetered details against daily kWh values will be finalised by 31/8/2022 and any material updates will be backdated to the 14th revision month and all others will be updated from 1/9/2022.</p>	31/8/2022	
<p>Revision files are run multiple times including the start of BD13, people action any issues asap so that we are submitting as accurate as possible on washup submissions. We now have a much earlier cut off for resolving issues than previously to ensure we meet the strict 4pm deadline.</p>	Ongoing	

Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Dec-21</p> <p>To: 09-Aug-22</p>	<p>CTCT, CTCX and CTCS</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</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 moderate overall, and Contact is working to investigate issues and improve controls.</p> <p>The impact is high based on the volume differences identified, and that corrected data has not yet been prepared in some instances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u> Ongoing training for the team members. Meeting to allocated responsibilities to the correct teams.</p> <p><u>CTCX/CTCS</u> Readings omitted by the data transfer process - The root cause was addressed via a process change effective 16 May 2022 to the SQL query extracting data from the Datawarehouse. There is a further change in the pipeline, detailed in the preventative actions sections, that will resolve the remaining issues.</p> <p>Incorrect agreed switch readings - The Bulk Switch out SQL script and associated Excel model were updated to resolve the issue with incorrect calculation of last read in June 2022. We have not tried to correct switch readings sent to registry prior to this date.</p> <p>ICP 0007200667RN539 had 14 kWh of inactive consumption under reported for 29 April 2022. The Registry has been updated now and the disconnection event has been reversed. This ICP is now active from original switch in date and all consumption billed and reconciled.</p> <p>Incorrect unmetered load - readings were corrected during the audit</p> <p>Missing HHR volume and ICP days - System changes to ensure MEP estimates were imported correctly and flagged as estimates were made in April 2022.</p> <p>The absence of reads on ICP 0007173300RN6EB contributed to the incorrect ICP days reporting when the ICP changed NSPs, a read has now been received and this is now resolved.</p>		<p>Ongoing 23/08/2022</p> <p>31/12/2022</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT :</u> Ongoing training for the team members. Meeting to allocated responsibilities to the correct teams.</p> <p><u>CTCX/CTCS</u> Several issues identified in this section relate to the completeness of reading data sent to our NHH DA system - MADRAS. A code change to ensure all readings inserted, removed (unvalidated) or updated, are sent to MADRAS</p>		<p>Ongoing</p> <p>31/12/2022</p>	

<p>regardless of the date on which the insertion or update was made is being tested and will undergo a material change audit before release. It is expected that these changes will resolve the issues with correct readings being used to calculate submission information.</p> <p>On 8 August 2022 the Bulk switch out model was updated with additional security and logging added so that calculations cannot be edited without password access; and also to allow developers to log changes as they are made. This will mitigate the risk of users accidentally overwriting formulae and will also ensure changes made to the logic are tracked for future investigations.</p> <p>A task has been added to the regular monthly compliance schedule to ensure all inactive ICPs are reviewed to ensure there is no reported consumption; and where an ICP has been inactive for longer than 12 months without a reading, a special manual reading will be requested.</p> <p>A review of all unmetered ICPs Trader Unmetered details against daily kWh values will be finalised by 31/8/2022 and any material updates will be backdated to the 14th revision month and all others will be updated from 1/9/2022.</p> <p>Improved meter reading attainment will now mitigate any ICPs we are unable to process NSP Changes for.</p>	<p>Complete</p> <p>Ongoing</p> <p>31/8/2022</p> <p>Ongoing</p>	
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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: 01-Oct-20</p> <p>To: 01-Dec-20</p>	<p>CTCT and CTCS</p> <p>Some estimates were not replaced by revision 14.</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
<p>Low</p>	<p>The controls are rated as weak overall:</p> <ul style="list-style-type: none"> for CTCT there are processes to attain readings and enter permanent estimates, but not all ICPs have permanent estimates entered by revision 14, and for CTCS and CTCX there are processes to attain readings, but there is no process to enter permanent estimates. <p>There are sound estimation processes, therefore I have recorded the audit risk rating as low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u> Contact will be creating new reporting covering FE prior to WU14 submission. We will be raising a ticket for our SAP analysts to investigate incidences where PE was not applied.</p> <p><u>CTCS</u> We are unable to correct previous FE reporting in the R14 files</p>	<p>ASAP</p> <p>ASAP</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT :</u> Contact continues to focus on long term no access properties process. Contact will be creating new reporting covering FE prior to WU14 submission. We will be raising a ticket for our SAP analysts to investigate incidences where PE was not applied.</p> <p><u>CTCS</u> A process was implemented in July to monitor FE remaining at R14. The ICPs involved are then escalated to Ops to individually investigate to see if an actual reading can be obtained. In addition to the stronger control related to gaining meter readings detailed in this audit report, a further submission process enhancement is planned to be implemented by the end of this calendar year to enable automated creation of permanent estimates at R14 where no actual reading can be obtained.</p>	<p>Ongoing</p> <p>ASAP</p> <p>Complete</p> <p>31/3/2023</p>	

Reconciliation participants to prepare information	
Non-compliance	Description
<p>Audit Ref: 12.9 With: Clause 2(1)(c) of schedule 12.3</p>	<p><u>CTCT</u> 1099580899CN808 had metering category 3 with NHH submission and RPS profile from 22 February 2022 until 27 February 2022. It switched to CTCS 28 February 2022 and has HHR profile applied for CTCS' period of supply. ICP 0314801030LCF84 had its HHR volume submitted against PEN0221 instead of PEN0331. CTCT supplied the ICP since 7 July 2010. The change of NSP effective 15 October 2020 on 15 October 2020 was not successfully loaded in SAP, and the NSP mismatch was not detected and corrected until 24Maech 2022 when it was found through the reconciliation team's GR090 validation.</p>

From: 22-Feb-22 To: 24-Mar-22	Potential impact: High Actual impact: Low Audit history: Twice previously 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
CTCT Contact has made steady improvements with monitoring the changes of NSP events mismatching data since our last audit. We continue to actively work with our customers and distributors to update SAP in time and to resolve any non-compliances.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT The Registry Analyst and Reconciliation team will review current monthly discrepancy reporting with a view to improve scope and accuracy.	ASAP	

Historical estimates and forward estimates	
Non-compliance	Description
Audit Ref: 12.10 With: Clause 3 Schedule 15.3 From: 01-May-20 To: 09-Aug-22	CTCS and CTCX Where SASV profiles are not available, consumption based on validated readings is labelled as forward estimate. Potential impact: None Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as strong because historic and forward estimate is correctly identified most of the time, now that UML and PV1 profile shapes are imported into MADRAS.</p> <p>The audit risk rating is low; there is no impact on settlement because the volume calculation is correct.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCS/CTCX</u></p> <p>We are unable to correct previous FE reporting.</p>		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCS/CTCX</u></p> <p>Where required, we are now submitting shape files to our NHH DA system for revisions to ensure validated actuals are not being reported as estimated. R14 and R7 submissions now are at 100% HE. Providing actual reads for all unmetered ICPs will further reduce the readings being labelled as Forward Estimate.</p> <p>A review of all unmetered ICPs Trader Unmetered details against daily kWh values will be finalised by 31/8/2022. This will mean going forward all unmetered ICPs will have an end of month read which will remove the Forward Estimate reading being used.</p>		<p>Complete</p> <p>31/3/2022</p>	

Forward estimate process	
Non-compliance	Description
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: 01-Jun-20</p> <p>To: 31-Jan-22</p>	<p>CTCT and CTCS</p> <p>Inaccurate forward estimate caused the thresholds not to be met in some instances.</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
<p>Low</p>	<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 is low because Initial data is replaced with revised data and washed up.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CTCT</u> We believe that the primary cause is the unpredictability of rural/irrigation usage patterns. In addition, there is the Covid related impact on meter readings.</p> <p><u>CTCS</u> We are unable to correct previous FE reporting. This is partly impacted by submission non-compliances noted above, however it is also impacted by ICPs with no reads. We are focussed on getting consistent reads for all of our ICPs as noted in our meter read attainment non-compliances to ensure our performance in submission reporting is improved.</p>	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CTCT</u> Contact will continue to review instances where thresholds are not met to better understand underlying reasons.</p> <p><u>CTCS</u> A further enhancement is planned to be implemented by the end of this calendar year to enable automated creation of permanent estimates at month 12 where no actual reading could be obtained. This should assist in complying with this clause.</p>	<p>Ongoing</p> <p>31/3/2023</p>	

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: 01-Oct-20</p> <p>To: 31-Dec-21</p>	<p>CTCT and CTCS</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: 4</p>

Audit risk rating	Rationale for audit risk rating		
Medium	<p>Overall, the controls are assessed to be moderate because compliance is achieved in most instances.</p> <p>The impact is assessed to be medium based on the quantity of forward estimate, and number of NSPs where the historic estimate requirements were not met.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><u>CTCT</u> We continue to work with our non-AMI meter reading provider to improve read attainment and to also target the long term no access properties</p> <p><u>CTCS</u> We are unable to correct previous submissions</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CTCT</u> We continue to work with our non-AMI meter reading provider to improve read attainment and to also target the long term no access properties</p> <p><u>CTCS</u> The proportion of Historic Estimate is monitored for all months and revisions and the existing process to follow up on anything less than 100% HE at R14 will be extended to check the thresholds at R3 and R7. A further enhancement is planned to be implemented by the end of this calendar year to enable automated creation of permanent estimates at month 12 where no actual reading could be obtained.</p>		<p>Ongoing</p> <p>31/3/2023</p>	