

Compliance plan for Nova Energy Limited

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 10.6, 11.2, 15.2</p> <p>From: 01-Mar-21 To: 31-Mar-22</p>	<p>TODD Some inaccurate data was not corrected as soon as practicable. Profile discrepancy on the day of meter change for upgrades and downgrades. Inaccurate submission for ARC Innovations HHR metering.</p> <p>WISE One ICP had an incorrect inactive status event date.</p> <p>HNET One ICP had an incorrect Profile code of PV1 where no generation was present. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time. The audit risk rating is low as the overall volume of ICPs affected is low. Where statuses are incorrect, the reconciliation process ensures that all consumption is reported. Status inaccuracies can have a minor impact on ICP days submissions.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>See sections listed below for further details specific to each area.</p> <p>Items 1, 2 and 3 See Sections 3.5, 3.8 and 3.9</p> <ul style="list-style-type: none"> In all instances data integrity reporting identified the discrepancies as expected. Due to resource constraints Nova's processes were not followed to make corrections once issues were identified by the data integrity reporting. All corrections have now been made <p>Item 6 See section 6.1.</p> <ul style="list-style-type: none"> Recommendation has been accepted. 		Identified

<p>WISE Response: Non-Compliance accepted.</p> <p>One ICP had incorrect Inactive status event date recorded in the Registry. See section 3.9</p> <ul style="list-style-type: none"> • The ICP was identified as part of the existing reporting, however due to human error the wrong date was used to update the Registry. See section 3.9 • This was corrected to reflect the correct Inactive dates on 27/04/2022 <p>HNET Response: Non-Compliance accepted.</p> <p>One ICP had the incorrect profile applied. See section 6.1</p> <ul style="list-style-type: none"> • This was due to human error and was corrected in March 2022. 	<p>April 2022</p> <p>March 2022</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD: Detailed outcomes are covered in the applicable sections of the audit document</p> <p>WISE: WISE will continue to focus on accuracy of event dates and complete and accurate information.</p> <p>HNET: A weekly internal review process has been instigated to review all ICPs with PV1 profile to confirm if an export meter is connected</p>	<p>On-going</p>	

Electrical Connection of Point of Connection	
Non-compliance	Description
<p>Audit Ref: 2.11 With: 10.33A</p>	<p>TODD 41 ICPs did not have full certification within five business days of reconnection.</p> <p>WISE ICP 100112843LCC6D's meter was not re-certified on unbridging.</p> <p>HNET Six ICPs did not have full certification within five business days of reconnection. Potential impact: Low Actual impact: Low Audit history: Three times</p>

From: 01-Mar-21 To: 14-Jan-21	Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong. Processes are in place to identify metering certification issues and replace affected meters. The impact on settlement is recorded as minor because installations with expired or interim certification may be less accurate than certified metering installations.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>41 ICPs late or no current certification</p> <ul style="list-style-type: none"> Nova continues to work with MEPs on deployment program(s), BAU field jobs, turn downs due to additional electrical work required and consumer contact challenges etc. These challenges are on-going across the industry <p>WISE Response: Non-Compliance accepted.</p> <p>One ICP did not have the metering certification updated on the Registry within timeframe after being unbridged.</p> <ul style="list-style-type: none"> Due to the site switching from WISE shortly after the unbridging this was not identified by WISE's processes. WISE has since followed up with the MEP who has now corrected the Registry as the site was recertified at the time of work being undertaken. <p>HNET Response: Non-Compliance accepted.</p> <p>Six late certifications for reconnections</p> <p>HNET has updated their service request template to capture if there is uncertified metering and due date to ensure updates are made within 5 working days</p>	April 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> Non-compliance will continue to occur as certifications continue to expire TODD will continue to work with MEPs to improve and/or meet the code timeframes <p>WISE & HNET:</p>	On-going	

WISE & HNET will continue to work with MEPs to meet the code timeframes		
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Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: 10 Schedule 11.1 From: 01-Mar-21 To: 28-Jan-22	TODD, HNET and WISE Some registry information was not updated within five business days of the event. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls for the timeliness and accuracy of status and trader updates are moderate for TODD and have improved as the audit period progressed. HNET and WISE controls are also moderate. Errors are identified and corrected by both HNET and WISE as soon as possible however due to the manual nature of these processes human error cannot be eliminated. The audit risk rating is medium. While the vast majority of updates to the registry occur within the required timeframe, submission type changes made more than seven months after the event date can result in distortion of the PRO30 seasonal adjusted shape values which traders use to create historic estimates and apportion consumption between revision periods, because the last version of the files used by traders is published following revision seven based on the submission information provided at that time.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. See Sections 3.5, 3.8 and 3.9 for further details <ul style="list-style-type: none"> In all instances data integrity reporting identified the discrepancies as expected. Due to resource constraints, the corrective actions required following Nova's robust exception identification processes were not always completed during the audit period. All corrections have now been made. WISE & HNET Response: Non-Compliance accepted. Some registry information was not updated within 5 business days of the event.	On-going	Identified

<ul style="list-style-type: none"> • HNET & WISE display on-going commitment to timely status updates which is reflected in our compliance results. • In instances where backdated corrections are made, we elect to provide complete and accurate information and acknowledge this creates contention with Clause 10 Schedule 11.1. 		
<p align="center">Preventative actions taken to ensure no further issues will occur</p>	<p align="center">Completion date</p>	
<p>TODD: Nova has considered and redistributed internal workflows to improve resource availability to this area. Further, we anticipate that the impact to staff availability due to COVID-19, and an incremental easing of the recruitment market moving forward, will result in increased compliance.</p> <p>HNET: HNET has updated the service request template to capture uncertified metering and due date to ensure updates are made within 5 working days</p> <p>WISE & HNET: On-going work with our industry stakeholders to improve compliance time frames. Where required, we elect to provide complete and accurate information over timeliness. Our focus will continue to be on accuracy of event dates and complete and accurate information.</p>	<p>On-going</p>	

Provision of information to the registry manager	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: 9 of schedule 11.1</p> <p>From: 01-Mar-21</p> <p>To:31-Mar-21</p>	<p>TODD</p> <p>254 late updates to active status for new connections.</p> <p>Ten newly connected ICPs (of a sample of 35) had incorrect active status event dates. Nine were corrected during the audit and 0000050570HRF60 will be corrected from 11/8/21 to 7/8/21 once the required network and MEP events have been reversed on the registry.</p> <p>HNET</p> <p>Two late updates to active status for new connections.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are rated as moderate. Validation reporting is in place to detect potentially incorrect active status dates, but these are not always resolved in a timely manner. The audit risk rating is low, the discrepancies have been corrected or are in the process of being corrected.</p> <p>The late updates were caused by resourcing, corrections or delays in receiving confirmation of the correct active status date, and/or waiting for other parties to correct their registry records.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>254 late updates to active status on New Connections.</p> <p>10 ICPS with incorrect first active date.</p> <ul style="list-style-type: none"> • 9 were corrected during audit. • ICP 0000050570HRF60 has now been corrected on the Registry and is reflecting the correct date of 07/08/2021 • Data integrity reporting identified the discrepancies as expected. • Due to resource constraints, the corrective actions required following Nova's robust exception identification processes were not always completed during the audit period. All corrections have now been made. <p>HNET Response: Non-Compliance accepted.</p> <p>Two late updates to active status for New Connections</p> <ul style="list-style-type: none"> • HNET updates the Registry as soon as paperwork is received from the MEP <p>HNET will continue to work with MEPs to ensure that timeframes are achieved in accordance with the code.</p>		<p>April 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> • Nova is developing an improvement for New Connections to increase efficiency and decrease the reliance on manual updates. This will reduce the risk of human error and the dependency on staff resource. Delivery by Q4 2022 • In the interim Nova has considered and redistributed internal workflows to improve resource availability to this area. Further, we anticipate that the impact to staff availability due to COVID-19, and an incremental easing of the recruitment market moving forward will result in increased compliance. 		<p>On-going</p>	

<p>HNET: On-going work with our industry stakeholders to improve compliance time frames</p>		
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ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6 With: 9 (1(k) Schedule 11.1 From: 01-Mar-21 To:31-Jan-22</p>	<p>TODD Five ICPs had incorrect ANZSIC codes applied. All have been corrected. HNET Two incorrect ANZSIC codes. Potential impact: None Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>Controls for TODD have increased to strong, now that validation reports have been expanded to include all ICPs. The exceptions occurred before the validation process was updated. Controls for HNET are moderate because most ANZSIC codes are checked on switch in, and a small number of exceptions were identified overall. Because most of the ICPs are supplied by TODD, and their processes are well designed and followed the controls are assessed to be strong overall. The audit risk rating is low this has no direct impact on submission accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted. Five ICPs had incorrect ANZSIC codes applied. <ul style="list-style-type: none"> All have been corrected during audit HNET Response: Non-Compliance accepted. Two ICPs had incorrect ANZSIC codes applied. <ul style="list-style-type: none"> All have been corrected during audit </p>	<p>April 2022</p>	<p>Cleared</p>

Preventative actions taken to ensure no further issues will occur	Completion date
<p>TODD:</p> <ul style="list-style-type: none"> Existing reporting was expanded to include all ICPs, rather than only new to Nova ICPS's, to find inaccuracies with ANZSIC records on 16 March 2021 New reporting was created focusing on new Commercial sites to confirm the ANZSIC code against the business record on the Companies register implemented 4 May 2021 	May 2021
<p>HNET:</p> <ul style="list-style-type: none"> A six-monthly internal audit sample review across all ANZSIC codes has been instigated, with the first occurring May 2022. ANZSIC codes on all switch in sites will be confirmed at time of switch. 	May 2022

Changes to unmetered load	
Non-compliance	Description
<p>Audit Ref: 3.7</p> <p>With: 9(1)(f) of Schedule 11.1</p> <p>From: 05-Nov-20</p> <p>To: 21-Apr-22</p>	<p>TODD</p> <p>ICP 0000394464MP147 had an unmetered builder's temporary supply from 16/7/21 until a meter was installed on 23/11/21. No unmetered load was recorded on the registry or in Orion for the period with unmetered load.</p> <p>ICP 0007198101RN234 had an unmetered BTS recorded and was confirmed to have been metered since it became active in 2020. A backdated removal of unmetered load was completed during the audit.</p> <p>ICP 0007200589RNF1B had an unmetered BTS recorded, and it was confirmed that the connection should be made permanent in December 2021. No job has been raised to install metering to date.</p> <p>ICPs 0000020042CP198 and 0000020056CPA3F had their shared unmetered load removed by the distributor effective from 1/12/21. The registry and Orion's unmetered load flag, trader details and daily unmetered kWh have not been updated, and unmetered load submissions are continuing.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	Monitoring controls are well designed and identify new unmetered load and unmetered load discrepancies daily, but the exceptions identified are not consistently investigated and resolved promptly due to resourcing.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <ul style="list-style-type: none"> 0000394464MP147 had unrecorded UML for the period 16/7/2021 to 23/11/2021 when the permanent metering was installed. The site has now switched to another retailer and therefore this cannot be corrected. 0007198101RN234 had the backdated removal of UML processed during the audit 0007200589RNF1B is pending decommission as a new ICP was generated for the permanent metering. <p>Two ICPs should have had shared UML removed from the registry in December 2021. See Section 5.1</p>	May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> Nova accepts the recommendation from the auditor to clarify responsibilities within the operational teams for UML. Refresher training on the existing controls will be delivered by Q3 2022, and monthly compliance refresher sessions will commence with the Metering team in May 2022 <p>This area has been impacted by the resource constraints caused by COVID-19 with increased unplanned leave and experienced, knowledgeable team members leaving the business. Nova expects to see a return to our historical compliance achievement in the coming months.</p>	On-going	

Management of "active" status	
Non-compliance	Description
<p>Audit Ref: 3.8</p> <p>With: 17 Schedule 11.1</p> <p>From: 04-Feb-20</p> <p>To: 05-Oct-20</p>	<p>TODD</p> <p>10 newly connected ICPs of a sample of 35 had incorrect active status event dates. Nine were corrected during the audit and 0000050570HRF60 will be corrected from 11/8/21 to 7/8/21 once the required network and MEP events have been reversed on the registry.</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	The controls are rated as moderate, validation reporting is in place to detect potentially incorrect active status dates, but these are not always resolved in a timely manner. The audit risk rating is low, the discrepancies have been corrected or are in the process of being corrected.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. 10 ICPs with incorrect first active date. See Section 3.5 <ul style="list-style-type: none"> • Data integrity reporting identified the discrepancies as expected. • Due to resource constraints, the corrective actions required following Nova’s robust exception identification processes were not always completed during the audit period. All corrections have now been made. • ICP 0000050570HRF60 has now been corrected on the Registry and is reflecting the correct date of 07/08/2021 		April 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD: <ul style="list-style-type: none"> • Nova is developing an improvement for New Connections to increase efficiency and decrease the reliance on manual updates. This will reduce the risk of human error and the dependency on staff resource. Delivery by Q4 2022 • In the interim Nova has considered and redistributed internal workflows to improve resource availability to this area. Further, we anticipate that the impact to staff availability due to COVID-19, and an incremental easing of the recruitment market moving forward will result in increased compliance. 		On-going	

Management of “inactive” status	
Non-compliance	Description
Audit Ref: 3.9 With: 19 Schedule 11.1 From: 26-Mar-21 To: 04-Jun-21	TODD Eight ICPs were recorded with 1,11 “electrically disconnected at meter box switch” which should have had the status 1,12 “new connection in progress”. One was corrected during the audit, but ICPs 0007200708RNC13, 0000165673CK414, 0007201054RN9A7, 1000028279BP1F9, 1002137708LC9F9, 0007201721RNEB7 and 0007201721RNEB7 still have incorrect status reasons recorded for historic status records. Incorrect active event dates for ICPs 0008762650CN572 and 0000081478TR1F3. WISE

	<p>One ICP had an incorrect inactive status event date.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are assessed to be strong overall.</p> <ul style="list-style-type: none"> The incorrect status reason codes for TODD occurred due to a training issue and the incorrect records were created by one user ID. The issue did not recur after June 2021. . <p>The impact was assessed to be low overall:</p> <ul style="list-style-type: none"> For TODD the inactive status was correct although the reason code was not. There is no impact on volume or ICP days submissions. For WISE one ICP had an incorrect inactive status event date as this event was not amended once it was identified that the disconnection was unsuccessful. 		
Actions taken to resolve the issue	Completion date	Remedial action status	
<p>TODD Response: Non-Compliance accepted.</p> <p>Eight ICPs recorded as 1,11 instead of 1,12</p> <ul style="list-style-type: none"> One corrected in audit Two corrected shortly after audit Five switched to another retailer before the correction could be made <p>Two ICPs with incorrect active event dates</p> <ul style="list-style-type: none"> One has been corrected One is still under investigation to confirm dates as this was caused by a house fire with conflicting information provided <p>WISE Response: Non-Compliance accepted.</p> <p>One ICP had incorrect Inactive status event date recorded in the Registry</p> <ul style="list-style-type: none"> The ICP was identified as part of the existing reporting, however due to human error the wrong date was used to update the Registry. <p>This was corrected to reflect the correct Inactive dates on 27/04/2022</p>	April 2022	Cleared	

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> • Our focus will continue to be on accuracy of event dates and complete and accurate information. • Nova will monitor disconnected ICPs on an on-going basis and where required, look for opportunities for improvements. <p>WISE:</p> <p>WISE will continue to focus on accuracy of event dates and complete and accurate information.</p>	On-going	

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: 3 and 4 Schedule 11.3</p> <p>From: 01-Mar-21</p> <p>To: 27-Oct-21</p>	<p>TODD</p> <p>13 ANs had the AD (advanced metering) response code applied when the AMI flag was set to N.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls have improved to strong with implementation of new AMI hierarchy logic on 27/10/21 to ensure that the AD code is only applied where the AMI flag is set to Y. The audit risk rating is low as metering information is also available to the gaining trader directly from the registry.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response:</p> <p>Non-Compliance accepted.</p> <p>13 ICPs had response code AD (advanced metering) invalidly applied. None of the ICPs had the AMI flag selected at the time of the switch</p> <ul style="list-style-type: none"> • As this was a technical breach, no action was taken to correct the AN information provided <p>Further development was undertaken, and improved logic implemented to resolve the system hierarchy logic that was applying the incorrect code</p>	October 2021	Cleared

Preventative actions taken to ensure no further issues will occur	Completion date
TODD: New hierarchy AN logic was deployed to ensure that AD is only sent when the AMI flag is set to Y	October 2021

Losing trader must provide final information - standard switch

Non-compliance	Description
Audit Ref: 4.3 With: 5 Schedule 11.3 From: 01-Mar-21 To: 31-Mar-22	TODD Up to March 2022 CS average daily consumption is based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded. WISE Incorrect calculation of average daily consumption. 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 TODD, the controls have improved to strong with implementation the new average daily kWh logic in March 2022 which ensures that average daily kWh reflects the daily consumption between the last two actual readings. The audit risk rating is low because the values provided do reflect a reasonable estimate of daily average consumption for the ICPs. For WISE, the controls over CS file generation rated as moderate because most file content is correct. The average daily consumption is not calculated as described in the Registry Functional Specification and the controls over this portion of the process are weak. Overall, I have assessed the controls to be moderate. The audit risk rating is assessed to be low as the average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP.

Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. During the audit period, CS average daily consumption was based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were	March 2022	Identified

<p>confirmed to have incorrect average daily consumption recorded.</p> <ul style="list-style-type: none"> Development undertaken by Nova to correct the consumption calculation was implemented on 29 March 2022 <p>WISE Response: Non-Compliance accepted.</p> <p>Incorrect calculation of average daily consumption</p> <p>WISE will change our process to calculate and send average daily consumption based on the last two actual readings at the time of sending the CS file.</p>	Q2 2022	
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD: Development to change the daily consumption calculation to last actual read-to-read period completed and delivered March 2022.</p> <p>WISE: As above.</p>	March 2022	
	Q2 2022	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: 6(1) and 6A Schedule 11.3</p> <p>From: 21-Dec-21</p> <p>To: 21-Dec-21</p>	<p>TODD</p> <p>One RR breach.</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	The controls over the read renegotiation process are strong. The audit risk rating is low. The volume of late RR files was small.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>One inaccurate read type recorded in a RR file.</p>		Identified

<ul style="list-style-type: none"> Human error resulted in a read being recorded as estimated instead of actual. <p>No corrective action was taken as there was no material impact to the customer or gaining retailer</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: Nova will continue with on-going refresher training, review processes and where possible identify improvement opportunities	On-going	

 Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 01-Mar-21 To: 27-Oct-21	WISE Two E2 breaches. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are assessed as moderate due to the manual processes employed and a single operator is responsible for this task meaning there is little opportunity for any independent QA checks prior to submitting the AN file. The audit risk rating is assessed as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
WISE Response: Non-Compliance accepted. Two ICPs had event dates prior to the requested date. WISE continues to review their processes and look to implement improvements over these controls.	On-going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
WISE: WISE will undertake process review to strengthen controls in conjunction with staff refresher training	On-going	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: 11 Schedule 11.3</p> <p>From: 01-Mar-21</p> <p>To: 31-Mar-22</p>	<p>TODD</p> <p>Up to March 2022 CS average daily consumption is based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded.</p> <p>The CS files for 0000021298EA958 (21/8/21), 0007156981RNB03 (4/11/21), 0037930087PC48C (29/4/21) and 0478644574LC1E4 (19/6/21) were issued with correct read values but incorrect read types. The opening estimate read on the occupier account was used instead of the closing read on the customer account.</p> <p>The CS files for 0000013595TR992 (17/6/21), 0000160532WAEC6 (3/5/21) and 0000463024WE7FF (13/3/20) contained incorrect last actual read dates because reads after the switch out date were not made misreads.</p> <p>WISE</p> <p>Calculation methodology for average daily consumption not compliant.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>For TODD, the controls are moderate overall:</p> <ul style="list-style-type: none"> controls over average daily kWh have improved to strong with implementation the new logic in March 2022 which ensures that average daily kWh reflects the daily consumption between the last two actual readings; the audit risk rating is low because the values provided do reflect a reasonable estimate of daily average consumption for the ICPs, and controls are appropriately designed to ensure that correct switch reads and read types are provided, but the process is not always followed correctly, resulting in a small number of incorrect read types and last actual read dates; the audit risk rating is low because all read types are treated as validated or permanent estimates for switching, and the last actual read date can be used to help determine the accuracy of switch event dates but does not have a direct impact on the switching or reconciliation process. <p>For WISE, the controls over CS file generation rated as moderate because most file content is correct. The average daily consumption is not calculated as described in the Registry Functional Specification and the controls over this portion of the process are weak. The audit risk rating is assessed to be low as the average daily consumption values applied in the CS files give a reasonable estimate of the average daily consumption for the ICP.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted. CS average daily consumption was based on the average daily consumption over the previous year, not the last actual read-to-read period. At least ten CS files were confirmed to have incorrect average daily consumption recorded.</p> <ul style="list-style-type: none"> Development undertaken by Nova to correct the consumption calculation was implemented on March 2022 <p>Four ICPs had CS files issued with incorrect read types.</p> <ul style="list-style-type: none"> The current process for vacant sites resulted in inaccurate read types being captured as the opening estimate read was included in the CS files. The recommendation has been accepted with an improved process to be implemented by Q4 2022 <p>Three ICPs had incorrect last actual read dates provided</p> <ul style="list-style-type: none"> Actual reads received after the switch out date were not misread prior to the creation of the CS file due to human error. This resulted in the CS file containing last actual read dates that were after the switch effective date. <p>WISE Response: Non-Compliance accepted.</p> <p>Incorrect calculation of average daily consumption WISE will change our process to calculate and send average daily consumption based on the last two actual readings at the time of sending the CS file.</p>	<p>Q4 2022</p> <p>Q2 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD: Development to change the daily consumption calculation to last actual read-to-read period completed and delivered 29 March 2022.</p> <p>Vacant site processes are currently being reviewed with improvements to be implemented by Q4 2022</p> <p>Refresher training was delivered in April 2022 to reduce the risk of missing the action to misread actual reads gained post switch effective date prior to CS creation.</p> <p>WISE: As above.</p>	<p>Q4 2022</p>	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: 12 Schedule 11.3 From: 17-Aug-21 To: 15-Dec-21	TODD 14 RR breaches. The RR request for 0001010055ENDB8 17/8/21 was supported by customer photo readings rather than two actual readings. 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 over the read renegotiation process are strong. A small number of RR breaches occurred because of delays in obtaining the two actual reads required to issue an RR. Read attainment during the audit period has been impacted by Covid-19. One of the ten RRs checked was not supported by validated actual readings, contrary to TODD's process. This is likely to be an isolated incident. The audit risk rating is low. The late RR files are expected to improve data accuracy, and revised reconciliation data is washed up once the RR process is completed.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. 14 late RR files for switch moves <ul style="list-style-type: none"> Nova maintains following best practices and only sends files outside of timeframe when required to correct invoicing for customers. One ICP with RR sent using customer photos reads instead of actual reads. <ul style="list-style-type: none"> Human error meant that Nova's processes were not followed, and customer reads were used to calculate a new RR read, instead of actual reads. As there was no financial impact Nova choose not to correct this.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: <ul style="list-style-type: none"> The staff member who made the error on customer reads is no longer with Nova. 	On-going	

Nova will continue with ongoing refresher training, review processes and where possible identify improvement opportunities.		
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Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.12 With: 14 Schedule 11.3 From: 01-Mar-21 To: 01-Mar-21	TODD ICP 0000008633CPA4B (1/3/21) had a HH NT issued but should have had a MI NT issued because it was a meter category 2 ICP. Potential impact: Low Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as processes in place are robust. The audit risk rating is low as only one ICP was affected, and there was no impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. One breach where a HH file type was sent instead of MI <ul style="list-style-type: none"> This was caused by human error not following correct process once identified in our pre-switch controls. As no impact to the customer or gaining trader, Nova did not send a switch reversal		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: Refresher training has been delivered to all staff responsible for this process.	April 2022	

Losing trader provision of information - gaining trader switch	
Non-compliance	Description
Audit Ref: 4.13 With: 15 Schedule 11.3	TODD Five ANs had response code AD (advanced metering) invalidly applied. None of the ICPs had the AMI flag selected at the time of the switch.

From: 25-Mar-21 To: 17-Jun-21	Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are now strong because the system issue resulting in the AD code being applied for HHR meters where the AMI flag was set to N has been resolved, and the issue has not occurred since October 2021. The impact is low, because metering details can be confirmed from other information recorded on the registry.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Five ICPs had response code AD (advanced metering) invalidly applied. None of the ICPs had the AMI flag selected at the time of the switch <ul style="list-style-type: none"> As this was a technical breach, no action was taken to correct the AN information provided Further development was undertaken to resolve the system hierarchy logic that was causing the incorrect code to be used	October 2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: New hierarchy AN logic was deployed to ensure that AD is only sent when the AMI flag is set to Y	October 2021	

Withdrawal of switch requests	
Non-compliance	Description
Audit Ref: 4.15 With: 17 and 18 Schedule 11.3	TODD Three SR breaches. 34 NA breaches. WISE One NA breach. HNET One SR breach. One NA breach. Potential impact: Low Actual impact: Low

From: 27-May-21 To: 29-Nov-21	Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls over the withdrawal process are robust. The audit risk rating is assessed to be low as the impact to the market is minimal.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>3 SR breaches, 34 NA breaches</p> <ul style="list-style-type: none"> Nova considers it is in the best interest of the customer to correct data to invoice accurately and that we comply with Clause 11.2 of part 11 “to provide complete and accurate information”. Nova recognises this may cause some low impact non-compliances <p>WISE Response: Non-Compliance accepted.</p> <p>One NA technical breach</p> <ul style="list-style-type: none"> One NW file was sent past compliance timeframes due to identifying an incorrect ICP as being gained for a new customer. <p>HNET Response: Non-Compliance accepted.</p> <p>One SR breach</p> <ul style="list-style-type: none"> HNET sent the original NW within timeframe. The breach occurred as the losing retailer repeatedly rejected the NW, eventually accepting. <p>One NA technical breach</p> <p>HNET sent the NW to correct the gain date for their customer as soon as they were made aware of the move in date changing for the customer as a result of COVID=19 restrictions.</p>		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD, WISE & HNET: Nova will continue with on-going refresher training, review processes and where possible identify improvement opportunities</p>	On-going	

Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: 11.14</p> <p>From: 01-Dec-21</p> <p>To: 21-Apr-22</p>	<p>TODD</p> <p>ICPs 0000020042CP198 and 0000020056CPA3F had their shared unmetered load removed by the distributor effective from 1/12/21. The registry and Orion's unmetered load flag, trader details and daily unmetered kWh have not been updated, and unmetered load submissions are continuing.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	Monitoring controls are well designed and identify new unmetered load and unmetered load discrepancies daily, but the exceptions identified are not consistently investigated and resolved promptly due to resourcing. The impact on submission is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response:</p> <p>Non-Compliance accepted.</p> <p>See Section 3.7 for accepted recommendation on clarifying responsibilities for UML.</p> <p>The two ICPs in question have been corrected, with UML updated in both the Registry and Orion.</p>	May 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD Response:</p> <p>Refresher training will be delivered in the business to embed process knowledge.</p> <p>This issue has been compounded by resource constraints caused by COVID-19. we expect to see a return to our historical compliance in this area within the coming months.</p>	Q3 2022	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1 With: 10.13</p> <p>From: 19-Feb-21 To: 20-Jan-22</p>	<p>TODD While meters were bridged, energy was not metered and quantified according to the code for one ICP. 27 ICPs had generation recorded by the distributor and I flow metering where TODD did not record a generation profile and were not corrected until the audit was completed.</p> <p>WISE While meters were bridged, energy was not metered and quantified according to the code for five ICPs.</p> <p>HNET For one ICP 0404307035LC42B an incorrect profile code of PV1 was applied when no generation was present.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong for bridged meters, and moderate for distributed generation. Controls are moderate overall because they are not sufficient to ensure that distributed generation profile issues are promptly resolved, or in the case of HNET EG1 profile ICPs, able to be readily resolved.</p> <p>The audit risk rating is low as the volumes for the sample of bridged meters were confirmed to be as accurate as possible. For distributed generation revised data will be provided through the revision process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>27 ICPs did not have a generation profile correctly recorded.</p> <ul style="list-style-type: none"> Data integrity reporting identified the discrepancies as expected. Due to resource constraints, the corrective actions required following Nova's robust exception identification processes were not always completed during the audit period. <p>One ICP did not have energy correctly metered and quantified while bridged according to the code.</p> <ul style="list-style-type: none"> Data integrity reporting identified the discrepancy as expected but the process to resolve this was not followed. The correction has now been made in Orion and is due to be invoiced. 	April 2022	Identified

<p>WISE Response: Non-Compliance accepted.</p> <ul style="list-style-type: none"> The existence of bridged meters where energy was not metered or quantified during bridge period is acknowledged <p>HNET Response: Non-Compliance accepted.</p> <p>One ICP had the incorrect profile applied. See section 6.1</p> <ul style="list-style-type: none"> This was due to human error and was corrected in March 2022. 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD: Nova expects COVID-19 to have reduced impact moving forward which will result in increased compliance. Additional training will be carried out for the members of the team who manage the data integrity reports on these items to be completed Q3 2022</p> <p>WISE: WISE continues to work with MEPs through service level agreements and on-going regular operational meetings to ensure bridging of meters continues to be an undesirable outcome</p> <p>HNET: A weekly internal review process has been instigated to review all ICPs with PV1 profile to confirm if an export meter is connected</p>	Q3 2022	

Responsibility for metering at GIP	
Non-compliance	Description
<p>Audit Ref: 6.2 With: 5 of Schedule 15.2 From: 02-Jan-21</p>	<p>TODD (TGTL) The MEP and certification for MKE1101TGTLGG wasnot completed before the previous certification expired. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong</p>

To: 31 Dec 2021	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	At the time of the audit the controls were rated as weak because although a process was in place, the required fields were not populated as expected. Nova has since developed a tracking system which includes all metering points, which will be subject to regular reviews to ensure certification and notification occurs as required. I have recorded the controls as strong at the time of the audit report and the effectiveness of the controls will be checked during the next audit. The audit risk rating is low because the no issues were identified at the time the installation was recertified.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD Response: Non-Compliance accepted. <ul style="list-style-type: none"> • Permission restrictions on the Reconciliation Manager's (RM) portal resulted in Accucal not being able to update the certification date for MKE1101TGTLGG. • RM provided Accucal with access to make updates on TGTL's behalf at which state the certification dates were updated. 		May 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD: The RM has granted Accucal permissions to make updates on behalf of the TGTL code Todd Generation have implemented a new tracking system for Generation Meters to monitor certification expiry and plan maintenance on these assets. Increased compliance with reduced risk of certification breaches is expected as an outcome.		April 2022	

Collection of information by certified reconciliation participant	
Non-compliance	Description
Audit Ref: 6.5 With: 2 Schedule 15.2 From: 14-Jan-19 To: 07-Apr-21	TODD Four ICPs were not interrogated within their maximum interrogation cycle. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because most ICPs were interrogated within their maximum interrogation cycle, and AMS had attempted to resolve the issues preventing interrogation.</p> <p>The impact is low because the ICPs are not expected to be consuming energy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>Monitoring and investigation occurred on all sites impacted.</p> <p>One site is pending decommission, the remaining three will be resolved when the mains are turned back on.</p>		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD: Monthly monitoring of missing data resulting in estimates for C&I TOU ICPs for billing and reconciliation.</p> <p>Site visits are initiated to obtain data / restore comms in instances where a temporary vacancy is not expected.</p>		On-going	

Interrogate meters once	
Non-compliance	Description
<p>Audit Ref: 6.8</p> <p>With: 7(1) and (2) Schedule 15.2</p> <p>From: 19-May-21</p> <p>To: 10-Dec-21</p>	<p>TODD</p> <p>Exceptional circumstances were not proven for six of the ten ICPs sampled that were not read during the period of supply.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as weak for TODD because the read attainment process for NHH non-AMI meters has been suspended since August 2021, making it unlikely that the best endeavours requirements will be met for most ICPs. The impact of the suspension is low, because even if the process was operating it may not be possible to achieve read attainment because of Covid-19 restrictions.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>Due to the changing COVID alert levels since August 2021, Nova paused the customer communication processes developed to achieve read attainment to support staff, contractor, and public health.</p> <ul style="list-style-type: none"> Our processes to increase read attainment will be reinstated from 1 June 2022, following the country entering Orange Alert Level. <p>The process was not immediately reinstated to allow opportunity to attempt internal meters and confirm status of access issues.</p>	June 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> The processes described by the auditors will be reinstated from 1 June 2022. Nova expects to see increased read attainment from this point. <p>Nova's view is prioritizing public safety throughout the COVID 19 response over meter read attainment was the appropriate approach,</p>	June 2022	

NHH meters interrogated annually	
Non-compliance	Description
<p>Audit Ref: 6.9</p> <p>With: 8(1) and (2) Schedule 15.2</p> <p>From: Jan-21 to Dec-21</p>	<p>TODD</p> <p>The best endeavours requirements were not met for nine of the ten ICPs sampled that were not read during the previous 12 months.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as weak for TODD because the read attainment process for NHH non-AMI meters has been suspended since August 2021, making it unlikely that the best endeavours requirements will be met for most ICPs. The impact of the suspension is low, because even if the process was operating it may not be possible to achieve read attainment because of Covid-19 restrictions.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted. See section 6.8</p> <p>Due to the changing COVID alert levels since August 2021, Nova paused the customer communication processes developed to achieve read attainment to support staff, contractor, and public health.</p> <ul style="list-style-type: none"> • Our processes to increase read attainment will be reinstated from 1 June 2022, following the country entering Orange Alert Level. <p>The process was not immediately reinstated to allow opportunity to attempt internal meters and confirm status of access issues.</p>	June 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> • The processes described by the auditors will be reinstated from 1 June 2022. Nova expects to see increased read attainment from this point. <p>Nova's view is prioritizing public safety throughout the COVID 19 response over meter read attainment was the appropriate approach,</p>	June 2022	

NHH meters 90% read rate	
Non-compliance	Description
<p>Audit Ref: 6.10 With: 9(1) and (2) Schedule 15.2</p> <p>From: Sep-21 to Dec-21</p>	<p>TODD The best endeavours requirements were not met for eight of the ten ICPs sampled that were not read during the previous four months.</p> <p>HNET Exceptional circumstances not proven for nine NSPs where the four-month read attainment was below 90%.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	Controls are rated as weak for TODD because the read attainment process for NHH non-AMI meters has been suspended since August 2021, making it unlikely that the best endeavours requirements will be met for most ICPs. The impact of the

	suspension is low, because even if the process was operating it may not be possible to achieve read attainment because of Covid-19 restrictions.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted. See section 6.8</p> <p>Due to the changing COVID alert levels since August 2021, Nova paused the customer communication processes developed to achieve read attainment to support staff, contractor, and public health.</p> <ul style="list-style-type: none"> • Our processes to increase read attainment will be reinstated from 1 June 2022, following the country entering Orange Alert Level. • The process was not immediately reinstated to allow opportunity to attempt internal meters and confirm status of access issues. <p>HNET Response: Non-Compliance accepted.</p> <p>HNET accepts that exceptional circumstances were not proven for 9 NSPs. COVID-19 and the resulting public health measures have increased the difficulties in gaining reads.</p>	June 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> • The processes described by the auditors will be reinstated from 1 June 2022. Nova expects to see increased read attainment from this point. • Nova's view is prioritizing public safety throughout the COVID 19 response over meter read attainment was the appropriate approach, <p>HNET: HNET will continue to actively work with external agents to gain actual reads in the earliest timeframe possible</p>	June 2022	

Correction of HHR metering information	
Non-compliance	Description
<p>Audit Ref: 8.2 With: 19(2) Schedule 15.2</p>	<p>TODD HHR corrections for AMI meter exchanges results in some volume not being accounted for.</p> <p>Potential impact: Low Actual impact: Low</p>

From Jan-21 to Dec-21	Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate for TODD because for AMI meter changes the automated process does not handle this scenario well, resulting in some unaccounted for consumption. C&I HHR data corrections have more robust checks in place to ensure all volume is reflected in submission. The risk rating is low as the market impact is assessed as minor to both HHR submissions and also the downstream calculation of seasonal shapes by the Reconciliation Manager.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD Response: Non-Compliance accepted. Nova is investigating options to integrate the meter removal read manually taken at the register level with the AMI reads at the data stream level to use both in the half-hour estimation process. <ul style="list-style-type: none"> This is complicated by register read indexes being out of step in some cases with the AMI midnight reads delivered by the MEP making the two sets of reads incompatible e.g., ARC meters. The option of always removing an ICP from HHR submission (changing to RPS) when an AMI-to-AMI meter exchange occurs is being considered as an alternative. 	Q4 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: If an appropriate estimation option cannot be found to account for the partial day, affected ICPs can be backdated to remove them from HHR reconciliation and move them back to RPS prior to the meter exchange.	Q4 2022	

Identification of readings	
Non-compliance	Description
Audit risk rating	Rationale for audit risk rating
Low	The controls over the read renegotiation process are strong, a small number of errors occurred where a step was missed when updating the readings. The audit risk rating is low because there is no impact on the submission process; all switch event readings are treated as validated by the reconciliation process.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>Three inaccurate read types recorded in a RR file. See sections 4.4 and 4.11</p> <ul style="list-style-type: none"> Human error resulted in a read being recorded as estimated instead of actual. No corrective action was taken as there was no material impact to the customer or gaining retailer <p>Four ICPs had CS files issued with incorrect read types. See section 4.10</p> <p>The current process for vacant sites resulted in inaccurate read types being captured as the opening estimate read was included in the CS files. The recommendation has been accepted with an improved process to be implemented by Q4 2022</p>	Q4 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <ul style="list-style-type: none"> Vacant site processes are currently being reviewed with improvements to be implemented by Q4 2022 <p>Nova will continue with on-going refresher training, review processes and where possible identify improvement opportunities</p>	Q4 2022	

Meter data used to derive volume information	
Non-compliance	Description
<p>Audit Ref: 9.3 With: 3(5) Schedule 15.2</p> <p>From: 1-Jun-20 To: 14-Apr-22</p>	<p>TODD for AMS and EDMI data collection The EIEP3 and GENDF file formats 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.</p> <p>TODD AMI data AMI readings with decimal places are rounded to zero decimal places on import into Orion, and the rounded readings are used to calculate submission data.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are rated as moderate because they are not sufficient to ensure that submission information is consistently calculated from unrounded data.</p> <p>For HHR, 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. There is no impact for the GENDF file format, because AMS completes submission for GENH ICPs.</p> <p>For AMI, the impact is assessed to be low because the ICP level differences are expected to be very small, and the overall differences are expected to be small because there will be under and overs due to the rounding technique.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>Nova will investigate with AMS/EDMI to confirm If unrounded values can be delivered</p>		Q3 2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD: As above</p>		Q3 2022	

Calculation of ICP days	
Non-compliance	Description
<p>Audit Ref: 11.2</p> <p>With: 15.6</p> <p>From: Jan-21</p> <p>To: Dec-21</p>	<p>TODD</p> <p>Zeroing does not occur for AV110 submissions. At least two HHR ICP days differences between AV110 submissions and the registry were caused by backdated withdrawals or NSP changes where data recorded against the old aggregation attributes combination for the period was not zeroed.</p> <p>WISE</p> <p>Incorrect ICP days for two ICPs (0351490850LCAAD & 1002056702LCCFC).</p> <p>HNET</p> <p>Zeroing does not occur for AV110 submissions. At least two HHR ICP days differences between AV110 submissions and the registry were caused by backdated withdrawals or NSP changes where data recorded against the old aggregation attributes combination for the period was not zeroed.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate overall.</p> <ul style="list-style-type: none"> • The incorrect ICP days affects only two ICPs. • Zeroing processes are in place at NSP level for volume information, but not ICP days. <p>The impact is assessed to be low based on the differences identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>WISE Response: Non-Compliance accepted.</p> <p>Two ICPs with Incorrect ICP days</p> <ul style="list-style-type: none"> • Caused by incorrect information updated into PEBS due to processes not being followed in full. • PEBS was corrected in audit resolving the issue <p>TODD & HNET Response: Unable to identify the non-compliance in the AV110 HHR ICP days as the submissions appear to have been provided in accordance with 15.6. The issue with zeroing appears to result from legacy behaviour in the RM's system that is not supported by the Code, rather than because of non-compliant trader submissions.</p>		<p>April 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>WISE: Further controls have been put in place preventing the inputting of incorrect information into PEBS</p> <p>TODD & HNET: As above</p>		<p>April 2022</p>	

Electricity supplied information provision to the reconciliation manager	
Non-compliance	Description
<p>Audit Ref: 11.3 With: 15.7</p> <p>From: 01-Apr-21 To: 31-Dec-21</p>	<p>HNET Electricity supplied file incorrect for the period April to December 2021.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate 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 mitigate the risk of incorrect as billed data for most ICPs.</p> <p>The impact is rated as low because there is no impact on market submission, and only one ICP was affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>HNET Response: Non-Compliance accepted.</p> <p>Electricity supplied file incorrect for the period April to December 2021</p> <ul style="list-style-type: none"> • A process error meant that a compensation factor was applied twice to certain ICPs. • A fix in the process was implemented in March 2022 <p>Billed vs Submission volumes for the last six months have been reviewed and proven compliant</p>		March 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>HNET Response: As per the auditor's recommendation, beginning April 2022 GR130 reports are reviewed monthly to confirm whether the relationship between billed and submitted data appears reasonable</p>		April 2022	

HHR aggregates information provision to the reconciliation manager	
Non-compliance	Description
<p>Audit Ref: 11.4 With: 15.8</p> <p>From: 30-Apr-21 To: 30-Apr-21</p>	<p>TODD Alleged breach 2103NOVE1 for late provision of submission information.</p> <p>Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls over accuracy and timeliness of submission data are strong. The issue was isolated.</p> <p>The audit risk rating is low based on the submission being three minutes late.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>The AV-140 HHRAGGR submission has been fixed to aggregate together ICP volumes that appear for the same ICP from both the mass market AMI HHR system (Energy Market) and the C&I HHR system (Stark) e.g., upgrades/downgrades mid-month.</p>	Q2 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD: As above</p>	Q2 2022	

Creation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.2 With: 15.4</p> <p>From: 30-Apr-21 To: 14-Apr-22</p>	<p>TODD Alleged breach 2103NOVE1 for late provision of submission information. ICP 0000394464MP147's unmetered builder's temporary supply was not recorded in Orion or the registry resulting in under submission of 199.68 kWh. ICP 1099569767CN556's controlled meter was confirmed to be bridged from 11/10/21 until the meter was replaced and certified on 28/1/22. A correction was not processed to capture estimated consumption during the bridged period. ICP 0000177620HB50F's meter was stopped between 28/7/21 and 9/2/22. A correction was not processed to capture estimated consumption during the bridged period resulting in under submission of 3,335.834 kWh. Missing HHR submission data was identified for an AMI meter exchange for ICP 0005238501RN91B because interval data from the removed meter was only provided up to midnight the day prior to the meter change.</p> <p>WISE Alleged breach 2108NOVE1 for late provision of submission information. Inactive consumption was not submitted for one ICP (0000037354HR301 – 4.25 kWh).</p> <p>Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	The controls over timeliness and accuracy of submission data are strong. The exceptions were caused by incorrect inputs into the process rather than systemic issues.

	The audit risk rating is low based on the volume of under and over submission, and that the late submission was three minutes late.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD Response: Non-Compliance accepted.</p> <p>See sections 2.1, 3.7, 8.4 and 11.2.</p> <p>ICP 0000177620HB50F's meter was stopped</p> <ul style="list-style-type: none"> Stopped meter was exchanged on 09/02/2022 and closing read estimated on 08/04/2022. It is not unusual to obtain usage following the meter exchange to establish an estimate retrospectively. This will be washed up. <p>WISE Response: Non-Compliance accepted.</p> <p>One instance of late provision of submission information</p> <ul style="list-style-type: none"> WISE identified that due to the sudden announcement of a lockdown due to COVID-19 the deadline for submission information was unlikely to be met. WISE notified the Reconciliation Manager by email as soon as this was identified. <p>One instance of incorrect inactive consumption not being submitted.</p> <ul style="list-style-type: none"> See section 3.9, This has been corrected and was due to human error. 	On-going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD: As above</p> <p>WISE: WISE has amended their submission processes to ensure reports are automatically generated prior to the report submission date and time. Under this amended process, WISE is confident submission information will consistently be delivered on time.</p>	On-going	

Accuracy of submission information	
Non-compliance	Description
Audit Ref: 12.7 With: 15.12	TODD Breach relating to late submission of data.

<p>From:28-Jul-21 To: 14-Apr-22</p>	<p>Inaccurate submission for ARC Innovations HHR metering. ICP 0000394464MP147's unmetered builder's temporary supply was not recorded in Orion or the registry resulting in under submission of 199.68 kWh. ICP 0007198101RN234's unmetered builder's temporary supply was not removed when it became permanent, resulting in over submission. ICP 1099569767CN556's controlled meter was confirmed to be bridged from 11/10/21 until the meter was replaced and certified on 28/1/22. A correction was not processed to capture estimated consumption during the bridged period. ICP 0000177620HB50F's meter was stopped between 28/7/21 and 9/2/22. A correction was not processed to capture estimated consumption during the bridged period resulting in under submission of 3,335.834 kWh.</p> <p>HHR corrections for AMI meter exchanges results in some volume not being accounted for. UML volumes for two out of ten ICPs sampled were incorrect as the UML no longer applies.</p> <p>UML volumes for eight out of ten ICPs sampled did not match the manual calculation for January 2022.</p> <p>WISE Alleged breach 2108NOVE1 for late provision of submission information. Inactive consumption was not submitted for one ICP (0000037354HR301 – 4.25 kWh).</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2</p>	
<p>Audit risk rating</p>	<p>Rationale for audit risk rating</p>	
<p>Low</p>	<p>The controls over accuracy of submission data are moderate. The NHH exceptions were caused by incorrect inputs into the process rather than systemic issues</p> <p>The automated HHR corrections for AMI meter changes does not ensure all volume has been accounted for.</p> <p>Late delivery submission files had a minor impact to the RMs ability to start the Reconciliation process.</p> <p>The audit risk rating is low based on the volume of under and over submission.</p>	
<p>Actions taken to resolve the issue</p>	<p>Completion date</p>	<p>Remedial action status</p>
<p>TODD Response: Non-Compliance accepted.</p> <p>Refer to individual sections 2.1, 3.7, 8.2, 11.4</p> <p>Inaccurate submission for ARC Innovations HHR metering</p> <ul style="list-style-type: none"> The remaining ARC meters continue to be included for displacement with newer AMI. 	<p>2024</p>	<p>Identified</p>

<p>ICP 0000177620HB50F's meter was stopped</p> <ul style="list-style-type: none"> Stopped meter was exchanged on 09/02/2022 and closing read estimated on 08/04/2022. It is not unusual to obtain usage following the meter exchange to establish an estimate retrospectively. This will be washed up. <p>UML volumes</p> <ul style="list-style-type: none"> The billing team are performing a review of the UML data held <p>WISE Response: Non-Compliance accepted.</p> <p>One instance of late provision of submission information WISE identified that due to the sudden announcement of a lockdown due to COVID-19 the deadline for submission information was unlikely to be met. WISE notified the Reconciliation Manager by email as soon as this was identified.</p>	<p>Completed</p> <p>Q3 2022</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD: As above.</p> <p>WISE: WISE has amended their submission processes to ensure reports are automatically generated prior to the report submission date and time. Under this amended process, WISE is confident submission information will consistently be delivered on time.</p>	<p>On-going</p>	

Accuracy of submission information

Non-compliance	Description
<p>Audit Ref: 12.11</p> <p>With: Clauses 4 and 5 Schedule 15.3</p> <p>From: 01-Mar-21</p> <p>To: 31-Mar-22</p>	<p>TODD HE Scenarios J & K relating to UML load is not producing expected results as the volumes are being profiled using RPS SASV information.</p> <p>WISE HE Scenario C (ICP become Inactive then Active again within a month) is not producing expected results resulting in some volumes not being reported.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p>

	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	<p>TODD Controls are rated as strong as the process used is consistent for all NHH volumes calculated using actual or virtual meter registers and volume differences are small.</p> <p>WISE Controls are rated as strong as the frequency of the conditions required for this HE scenario to occur are rare. The audit risk rating is low as the overall volume of ICPs affected is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>TODD Response: Non-compliance accepted</p> <p>RPS profiling can be removed for UML load. The UML profile has been used for UML submissions historically and it was found that the RM allocates UML profile submission volumes using the RPS profile intramonth so this has perhaps led to a misunderstanding that submissions should also be profiled using the RPS profile.</p> <p>WISE Response: Non-Compliance accepted.</p> <p>Wise is reviewing the HE calculation process to resolve the issue when an ICP becomes active and then inactive within one month so the correct HE value can be reflected in submissions.</p>		Q2 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TODD: As above</p> <p>WISE: As above</p>		Q2 2022	

Historical estimate reporting to RM	
Non-compliance	Description
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p>	<p>TODD Historic estimate thresholds were not met for R3 and R7 for a small number of months and revisions.</p> <p>HNET</p>

<p>From: Apr 21 r7, Jun to Aug 21 r3</p>	<p>Historic estimate thresholds were not met for R3 and R7 for a small number of months and revisions.</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>		
<p>Audit risk rating</p>	<p>Rationale for audit risk rating</p>		
<p>Low</p>	<p>Controls are rated as strong, as they are sufficient to mitigate the risk of not meeting the threshold most of the time. The NSPs where the target wasn't met have a low total number of ICPs.</p> <p>The audit risk rating is low because the overall percentage of HE is high.</p>		
<p>Actions taken to resolve the issue</p>		<p>Completion date</p>	<p>Remedial action status</p>
<p>TODD & HNET Response: Non-Compliance accepted.</p> <p>The threshold was not met for some NSPs for revisions 3 and 7 because small number of ICPs are connected at the NSPs. NSPs with a small number of ICPs are susceptible to HE thresholds if one ICP can't be read i.e., due to access issues which was seriously impacted by Covid-19.</p> <p>See sections 6.8, 6.9 and 6.10 on read attainment</p>		<p>On-going</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>		<p>Completion date</p>	
<p>TODD & HNET: Continue focusing on optimising its standard by identifying and monitoring its performance and opportunities for improvement</p>		<p>On-going</p>	