

Compliance plan for Trustpower Limited Reconciliation Participant 2022

Relevant information	
Non-compliance	Description
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2 & 15.2</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p><u>TRUS</u></p> <p>Some inaccurate information is recorded on the registry and/or in GTV.</p> <p>Some submission inaccuracies.</p> <p>Corrections not conducted for two ICPs where meters were bridged.</p> <p>Investigation and correction not conducted for three ICPs with potentially inaccurate metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are moderate, as most data is recorded accurately, and validation processes are in place.</p> <p>The impact on settlement is minor, therefore the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>New connections: Best efforts are made to align information between GTV and the Registry via regular file transfer between the two systems and working queues that identify issues and errors within the transfers as well as discrepancy reporting.</p> <p>Revenue Assurance:</p> <p><u>Bridged meters:</u> Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p> <p><u>Investigation and correction not conducted:</u> 0000252550WT7EC – transposed reads investigation commenced – still in progress 0000460349WT61D – supply for house construction site - customer confirmed power not being used – meter since replaced – No RA issue 1000003149BP32F – meter reader alert first raised 09/09/20 – property disconnected 10/08/20 – and as we were unable to ascertain any current or historic reads, no RA case was able to be completed. However, as a result of the audit we have opened a RA case to calculate and submit the consumption for this ICP.</p> <p>We acknowledge that our current reporting capability in this area doesn't allow us to identify stopped meters in a timely manner. We will continue to look at viable options to counter this inefficiency.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>Completed</p> <p>Ongoing</p> <p>Ongoing</p>	<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>New Connections: Exception Reporting continues to be used and enhanced to identify and resolve any discrepancies that occur between GTV and the Registry.</p> <p>A gap in knowledge was identified around temporary connections, training will take place with the New Connections team will take place to ensure this is no longer an issue.</p> <p>Revenue Assurance:</p> <p>Bridged meters: Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p> <p>Any MRS reports with instances are looked at by the team as they come in and RA investigations logged with the MEP where required.</p> <p>Between the period of September 21 to February 22, Revenue assurance were heavily resource restrained with 5 of our team leaving which has reflected on our ability to monitor reports effectively. We are now once again fully staffed to address this shortfall.</p>	<p>March 2022</p> <p>Ongoing</p> <p>Completed</p> <p>Completed</p>	

Temporary Electrical Connection of an ICP		
Non-compliance	Description	
<p>Audit Ref: 2.10</p> <p>With: Clause 10.33</p> <p>From: 05-Aug-20</p> <p>To: 20-May-21</p>	<p>TRUS</p> <p>11 ICPs were temporarily electrically connected without written permission from the network.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate and will mitigate risk most of the time but there is room for improvement.</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>Current reporting around New Connection date mismatches (IED, CO, Metering, Certification) is robust and does identify any sites temporarily connected for certification purposes.</p> <p>A gap in knowledge was identified and this will be filled by training within the teams.</p>	March 2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections. Updated task documents and team training ongoing</p>	March 2022	

Electrical Connection of Point of Connection			
Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 29-Oct-20</p> <p>To: 25-Nov-21</p>	<p>TRUS</p> <p>73 metered reconnected ICPs were not certified within five business days of becoming active.</p> <p>Three metered newly connected ICPs were not certified within five business days of becoming active.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate. Reporting is in place to identify metering certification issues, but some ICPs are not being identified as expected.</p> <p>The impact on settlement is recorded as minor because installations with expired or interim certification may be less accurate than certified metering installations.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Current reporting in place identifies sites that have been reconnected but are not recertified within 5 business days. In almost all instances reporting is working correctly identifying sites reconnected when uncertified. MEPs are notified of certification status however in most cases they do not re-certify.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We have already improved reporting around uncertified sites that have been reconnected and all ICPs identified during Audit as having not been picked up by reporting are now showing.</p> <p>We continue to engage MEPs to rectify uncertified sites as the occur.</p>		<p>Completed</p> <p>Ongoing</p>	

Meter bridging		
Non-compliance	Description	
<p>Audit Ref: 2.17</p> <p>With: Clause 10.33C and 2A of Schedule 15.2</p> <p>From: 01-Aug-21</p> <p>To: 27-Sep-21</p>	<p>TRUS</p> <p>Corrections not conducted for two ICPs where meters were bridged.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>0000414945TPD12 – site was bridged on reconnection 01/08/21 – bridged meter follow up logged 11/08/21 – paperwork confirming meter unbridged received 15/09/21. As the ICP had switched to an alt provider on 03/09/21 we were unable to ascertain any current or historic reads. No RA case was able to be completed.</p> <p>1000007390BPCBB – site was bridged on reconnection 11/08/21 – bridged meter follow up logged 16/08/21. This job was cancelled due to Covid Level 4 lockdown and then relogged 03/09/21. We received paperwork 27/09/21 confirming meter unbridged 08/09/21. The ICP had switched to an alt provider on 27/09/21 and as we were unable to ascertain any current or historical reads, no RA case was able to be completed.</p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads gained from the registry to estimate any unbilled consumption.	Ongoing	

Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p><u>CNIR</u></p> <p>From: 19-Oct-21</p> <p>To: 17-Jan-22</p> <p><u>TRUS</u></p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p><u>CNIR</u></p> <p>Two ICPs were not updated to inactive status on the registry within five business days of the event date.</p> <p>One ICP was not updated to active status on the registry within five business days of the event date.</p> <p>127 ICPs did not have trader information updated on the registry within five business days of the event date.</p> <p>Ten ICPs did not have ANZSIC codes populated within 20 business days of switch in or initial electrical connection.</p> <p><u>TRUS</u></p> <p>205 ICPs were not updated to inactive status on the registry within five business days of the event date.</p> <p>377 ICPs were not updated to active status on the registry within five business days of the event date.</p> <p>2,149 ICPs did not have trader information updated on the registry within five business days of the event date.</p> <p>59 ICPs did not have ANZSIC codes populated within 20 business days of switch in or initial electrical connection.</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 because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u> Manawa Energy’s reporting tools and knowledge sharing continues to ensure that Registry Information is updated within correct timeframes. A continuous improvement process is adopted.</p> <p>A number of these issues were related to the transition from TRUS to CNIR and the establishment of modified reporting to capture any ICPs due or overdue for updates. New Manawa specific reporting is now in place.</p> <p>Regular monitoring of timeliness of changes to registry information has been adopted via Audit Compliance Reporting analysis ordered from the Registry.</p> <p>Relationship development with MEPs and Networks to ensure the transfer of prompt information.</p> <p><u>TRUS</u></p> <p>Trustpower continues to look for opportunities to refine our reporting and processes to improve our performance in updating registry information within 5 business days.</p> <p>Reporting has been improved and created since last Audit to close gaps identified there. This will be an on-going task for us as a retailer.</p> <p>We continue to work with MEPs and Network to ensure updates are made in a timely manner on their side, so we do not experience flow on effects.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u> Gentrack has been enhanced so that GXP profiles are NOT used as a default for HHR Switches and New Connections this should eliminate the need for some backdated corrections. This will be released into Production following Separation 1 May 2022.</p> <p>ANZSIC Power BI Reporting has been recently developed. Discrepancies that were picked up were backdated. Report now up to date.</p> <p><u>TRUS</u></p> <p>Reporting was created to look for sites where the meter removal date and decommissioned status date differ to avoid late backdated inactive statuses being entered. As it is now live issues around backdating should disappear.</p> <p>Trustpower also continues to engage with third parties (MEPs) to reduce the number of late MEP nominations, specifically IHUB as we continue to have issues around alternate MEP metering being installed without advising TRUS.</p>	<p>Done</p> <p>Ongoing</p>	

Trader responsibility for an ICP		
Non-compliance	Description	
<p>Audit Ref: 3.4</p> <p>With: Clause 11.18</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>TRUS</p> <p>11 ICPs with the incorrect MEP nominated in the first instance.</p> <p>MEP not notified for one of the sample of ten decommissioned ICPs checked.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong, as the reporting in place will mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the correct MEP subsequently nominated.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>All nominations to incorrect MEP's in the first instance have now been addressed and corrected. Some of these instances are caused by MEPs installing metering not requested by TRUS in the first instance, we continue to communicate with MEPs to avoid this where possible.</p> <p>Reporting in place since last audit that ensures MEPs are notified of DEC/DED sites on all occasions. The above instance of late notification was picked up after reporting was created and MEP was notified once identified in reporting.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Ongoing conversations with IHUB so that if they are using a MTRX meter instead or vice versa they are notifying TRUS early so a correction nomination can be made.</p> <p>Reporting in place since last audit that ensures MEPs are notified of DEC/DED sites on all occasions. This is monitored on a daily basis to ensure MEPs are notified in all instances.</p>	Ongoing	

Provision of information to the registry manager	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p><u>CNIR</u></p> <p>From: 04-Oct-21</p> <p>To: 17-Jan-22</p> <p><u>TRUS</u></p> <p>From: 01-Jan-21</p> <p>To: 25-Nov-21</p>	<p><u>CNIR</u></p> <p>22 late updates to active status for new connections.</p> <p>Ten late ANZSIC codes not updated within 20 days of commencing trading.</p> <p><u>TRUS</u></p> <p>13 new ICPs (11 temporarily connected and ICPs 1000599753PCDB2 and 1002108871LC5B6) had the incorrect active status dates of the samples checked.</p> <p>417 late updates to active status for new connections.</p> <p>59 late ANZSIC codes not updated within 20 days of commencing trading.</p> <p>40 late updates to 1,12 (inactive new connection in progress) status for new connections, which also resulted in late MEP nominations.</p> <p>ICP 0000702000MP807 unmetered load details not populated when electrically connected.</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 recorded as strong as there is robust reporting and processes in place.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified, therefore the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u></p> <p>Robust reporting across the New Connection process to pick up discrepancies are worked daily by the New Connections Team.</p> <p>Paperwork timing is often a key cause of some late status updates, processes have been put in place to identify and follow-up on this outstanding paperwork</p> <p>Current reporting around New Connection date mismatches (IED, CO, Metering, Certification) is robust and does identify any sites temporarily connected for certification purposes.</p> <p><u>TRUS</u></p> <p>Robust reporting across the New Connection process to pick up discrepancies are worked daily by the New Connections Team.</p> <p>Current reporting around New Connection date mismatches (IED, CO, Metering, Certification) is robust and does identify any sites temporarily connected for certification purposes.</p> <p>A gap in knowledge was identified and this will be filled by training within the teams.</p> <p>Reporting will be introduced to stop TRUS from switching in sites at INC.</p>	<p>Ongoing</p> <p>Sept 2022</p> <p>Ongoing</p> <p>March 2022</p> <p>Sept 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u></p> <p>With relatively new staff and processes and reports being transitioned from TRUS to CNIR, there was a transition time to get all reports and training completed.</p> <p>Ongoing development and improvement of processes will continue, and any reporting required will be introduced over the coming months</p> <p><u>TRUS</u></p> <p>A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections.</p> <p>Reporting will be introduced to stop TRUS from switching in sites at INC that will mean we will no longer bring in sites prior to the ALT updating the status to CO.</p>	<p>Ongoing</p> <p>Sept 2022</p> <p>March 2022</p> <p>Sept 2022</p>	

ANZSIC codes	
Non-compliance	Description
<p>Audit Ref: 3.6</p> <p>With: 9 (1(k) Schedule 11.1</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21</p> <p>To: 10-Mar-22</p> <p><u>TRUS</u></p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p><u>CNIR</u></p> <p>Five incorrect ANZSIC codes of a sample of 60 ICPs sample (error rate 8.3%).</p> <p><u>TRUS</u></p> <p>Seven category 2 ICPs with a residential ANZSIC code applied.</p> <p>Nine of the 120 ICPs sampled with an incorrect ANZSIC code applied.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as strong because they mitigate risk to an acceptable level.</p> <p>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><u>CNIR</u></p> <p>Most examples are instances where we have switched a property in with the incorrect ANZSIC code. The implementation of new reporting limited the capability during the early period of transition to identify where an existing ANZSIC code may be incorrect.</p> <p>Reporting is now in place, and additional training will be given to help correctly identify the appropriate ANZSIC codes.</p> <p><u>TRUS</u></p> <p><u>ANZSIC codes – Cat 2 ICPs with a residential code applied:</u></p> <p>0007115757RN8B0 – Residential is correct code applied 0006004920RNDB8 – Residential is correct code applied 0000130745WE70F – Residential is correct code applied All other ICP’s on this list have since been corrected as advised.</p> <p>A report was created after last year’s audit findings that included looking at Cat 2 ICP’s with a residential ANZSIC code. We have logged a ticket asking for more enhancements for better visibility and functionality.</p> <p><u>ANZSIC codes – Incorrect code applied:</u></p> <p>Most examples are instances where we have switched a property in with the incorrect ANZSIC code. As highlighted in last year’s audit response we don’t have the capability at this time to identify where an existing commercial ANZSIC code may be incorrect, and no way of practically determining that.</p> <p>One way of mitigating part of the problem may be to monitor “House Construction” where an ICP has switched in with this code, or where this code has been in place for some time. A ticket has been logged to analyse if this is a viable option to add to our reporting capability.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>September 2022</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u></p> <p>Reporting and processes have been amended to better capture changes to ANZSIC codes at signup and capture potential variances on an ongoing basis.</p> <p>We believe we have taken best endeavours to help achieve compliance in this area with reporting enhancements</p> <p><u>TRUS</u></p> <p>Our reporting has been amended to highlight CAT 2 sites better. Our training and training documents have been updated to ensure these are not missed and are completed within expected timeframes.</p> <p><u>ANZSIC codes – Incorrect code applied:</u></p> <p>Most examples occurred when we have switched a property in with the incorrect ANZSIC code. As highlighted in last year’s audit we don’t have the capability to identify where an existing commercial ANZSIC code may be incorrect.</p> <p>One way of mitigating part of the problem may be to monitor “House Construction” where an ICP has switched in with this code, or where this code has been in place for some time. A ticket has been logged to analyse if this is a viable option to add to our reporting capability.</p> <p>We believe we have taken best endeavours to help achieve compliance in this area with reporting enhancements.</p>	<p>Done</p> <p>Completed</p> <p>Ongoing</p> <p>September 2022</p>	

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>TRUS</p> <p>Two ICPs had incorrect daily unmetered kWh recorded on the registry.</p> <p>ICP 0000702000MP807 unmetered load details not populated when electrically connected.</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 due to the change of staff, training is planned to bring the new team up to speed.</p> <p>The impact on settlement and participants is minor, as the discrepancies are very small.</p>	
Actions taken to resolve the issue		Completion date
<p>Shared Unmetered Load</p> <p>UML compliance has been a challenge for our team in recent times however the future looks brighter in this area. We now have Power BI discrepancy reporting in place and have recently trained two of our newer team members in the task, and with the move of the Chorus sites to Manawa Energy, the workload in this space is significantly more manageable.</p> <p>0000540598TU2BD – Logged for correction by the RA team</p> <p>0900086782PC61A – Logged for correction by the RA team</p>		<p>Completed</p> <p>June 2022</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We now have the capacity and capability to identify and correct shared unmetered load discrepancies in a timely manner.</p>		<p>Completed</p>

Management of "active" status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 17 of schedule 11</p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p>TRUS</p> <p>13 new ICPs (11 temporarily connected and ICPs 1000599753PCDB2 and 1002108871LC5B6) had the incorrect active status dates of the samples checked.</p> <p>ICPs 0000931333NVFD5 and 0119010321LC5F4 incorrectly left active.</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 recorded as strong as there is robust reporting and processes in place.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>All ICP's with incorrect active status dates identified in the audit have now been corrected in both GTV and the Registry.</p> <p>A gap in knowledge was identified and this will be filled by training within the teams.</p>		<p>Done</p> <p>March 2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections.</p>		<p>March 2022</p>	

Management of "inactive" status			
Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Mar-21 To: 26-Nov-21</p>	<p>TRUS</p> <p>ICP 0151745161LC3F3 was incorrectly backdated to inactive on 15/04/21 for 25/06/20 due to human error resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted.</p> <p>Three ICPs recorded as ready for decommissioning in error.</p> <p>ICP 1000020907BP931 was recorded as disconnected meter removed in error.</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 recorded as strong as there is robust reporting and processes in place.</p> <p>The impact on settlement and participants is minor based on the number of genuine exceptions identified, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>New connections: ICP's with incorrect inactive status dates identified in the audit have now been corrected where possible in both GTV and the Registry.</p> <p>The New Connection team has been advised that cancelled New Connections will no longer be updated to DEC.</p> <p>Revenue Assurance: 0151745161LC3F3 – Request logged with the RA team to process a case to ensure the missed consumption is correctly submitted. Human error and one-off incident.</p>		<p>Done</p> <p>Done</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The New Connection team has been advised that cancelled New Connections will no longer be updated to DEC. The process for cancelling New Connections will be the same across the board for all Networks.</p> <p>Revenue Assurance: Highlighted the error to the team and used this as a training opportunity.</p>		<p>Done</p> <p>Done</p>	

Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 08-Jul-21 To: 15-Nov-21	<p>TRUS</p> <p>Five ICPs with proposed event dates greater than ten business days of the NT receipt date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as AN code assignment is automated based on hierarchy and the AN proposed dates process is robust.</p> <p>The impact is assessed as low as the AN dates matched those requested by the gaining trader.</p>	
Actions taken to resolve the issue		Completion date
We acknowledge that our AN response controls are strong. In 2021 a support ticket was logged to prevent GTV from sending AN's that are more than 10 business in advance of the NT receipt.		September 2022
Preventative actions taken to ensure no further issues will occur		Completion date
Following the fix being implemented in January; we have found an example that indicates the controls are not working as intended for GTV automated AN response on transfers. Another support ticket has been logged to find a more appropriate fix to ensure there will be no further issues of non-compliance.		September 2022
Identified		

Losing trader must provide final information - standard switch			
Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 05-May-21</p> <p>To: 15-Jul-21</p>	<p>TRUS</p> <p>One TR breach.</p> <p>CS average daily consumption of zero was invalidly recorded for 0001061745AL30B (15/07/21).</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 recorded as strong, as there are robust checks in place to mitigate risk.</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>TR Breach ICP 0001042680PC1A0 – A thorough investigation has found the incorrect switch type was missed in error and the site was allowed to switch out as a Move In rather than a Transfer.</p> <p>CS Average daily load 0 – This was a system issue the ICP did not have an ADL loaded in GTV. A support ticket has been logged to analyse accounts that have a 0 ADL.</p>		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>TR Breach – Additional training has been delivered to ensure that the correct switch type is being identified and actioned appropriately.</p> <p>CS Average Daily Load – A ticket logged to explore installations with 0 ADL will be given urgent priority. A further support ticket has been logged to create reporting that will capture existing accounts with 0 ADL so that these can be amended.</p>		<p>04/2022</p> <p>09/2022</p>	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 Schedule 11.3 From: 01-Oct-21 To: 03-Nov-21	<u>CNIR</u> One late NT file. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>CNIR</u> The team are aware of the requirement to have a switch request on the registry within 2 business days of preconditions being cleared. The late NT file for ICP 0032789710NP18D was due to a human error in not checking details thoroughly to determine that there was >1 ICP to be switched for 1 customer.	Done	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<u>CNIR</u> The team and the account managers have been reminded about the 2 business days rules. The team have also been reminded to check all attachments and contracts to ensure all ICPs are accounted for.	Done	

Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21</p> <p>To: 13-Jan-22</p> <p><u>TRUS</u></p> <p>From: 05-Jun-21</p> <p>To: 24-Nov-21</p>	<p><u>CNIR</u></p> <p>Six AN files had the incorrect response code applied.</p> <p><u>TRUS</u></p> <p>Two AN files had the incorrect response code applied.</p> <p>Three ET breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as the AN process has been improved during the audit period.</p> <p>The impact is assessed as low because the incorrect codes did not impact on switch timeliness.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u></p> <p>AN response codes are selected manually from a dropdown list. Additional training and knowledge sharing has been provided. Documentation has been enhanced.</p> <p><u>TRUS</u></p> <p>Trustpower agrees to the findings in all instances:</p> <p><u>Incorrect AN code</u> – Both ICPs listed were actioned by users prior to our AN upload process being completed as part of our holds switching process.</p> <p>Learnings from these findings will be part of ongoing team training on this task and a recap will be delivered in addition to continue monitoring to emphasize the importance of updating the AN status correctly and adhering to the timing of our processes.</p> <p><u>ET Breaches</u> – All of these occurred due to human error, as per our audit findings in 2021 a support ticket was logged, and an enhancement put in place to prevent the user from entering an event date that is prior to the NT proposed event date.</p> <p>Also, in response to our audit findings in 2021 a support ticket was logged to prevent GTV from sending AN's that are more than 10 business days in advance of the NT receipt.</p>	<p>Done</p> <p>Ongoing</p> <p>11/2021</p> <p>01/2022</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u></p> <p>AN response codes will be monitored on a regular basis to check for any further non-compliances.</p> <p><u>TRUS</u></p> <p><u>N Files with incorrect response code</u> – Additional training will be delivered to the team to reinforce the importance of checking and amending the AN status code when working a switch from the responses.</p> <p><u>ET Breaches</u> – We have seen no further instances of an event date prior to the NT proposed event date since the enhancement was put in place in November 2021. Therefore, there should be no more instances of non-compliance.</p> <p>In 2021 a support ticket was logged to prevent GTV from sending AN's that are more than 10 business in advance of the NT receipt. However, following the fix being implemented in January; we have found an example that indicates the controls are not working as intended for GTV automated AN response on transfers. Another support ticket has been logged to find a more appropriate fix to ensure there will be no further issues of non-compliance.</p>	<p>Ongoing</p> <p>4/2022</p> <p>11/2021</p> <p>09/2022</p>	

Losing trader determines a different date - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: Clause 10(2) Schedule 11.3</p> <p>From: 02-Dec-20</p> <p>To: 29-Dec-20</p>	<p>TRUS</p> <p>Two incorrect AN codes sent.</p> <p>One CS file breach.</p> <p>Seven T2 breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong as processes and reporting in place will mitigate risk.</p> <p>The impact is assessed as low as the number of late files was small in relation to the volume processed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Trustpower agrees to the findings in all instances:</p> <p>Incorrect AN code – Both ICPs listed were actioned by users prior to our AN upload process being completed as part of our holds switching process.</p> <p>CS File Breach - Human error, this ICP 0000056673TRD11 was not picked up in our reporting due to continuously sitting at low priority until the due date. Modifications have been introduced to the reporting to highlight and move up the most urgent switches.</p> <p>Seven T2 Breaches - All instances were sent 1-2 days late as Trustpower was holding the CS files until an actual read and the delay was causing a non-compliance. The process and training documents have been amended to avoid these breaches.</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>CS File Breach – We will continue to monitor CS time breaches via daily and monthly reports. Modifications have been introduced to the reporting to highlight and move up the most urgent switches. This should prevent any future instances of non-compliance.</p> <p>T2 Breaches – CS switch loss report and process is now amended and working as intended. Training documents have been amended and ongoing training provided. This will prevent any further instances of non-compliance in this area.</p>	<p>05/2021</p> <p>04/2021</p>	

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><u>CNIR</u></p> <p>From: 01-Oct-21 To: 30-Nov-21</p> <p><u>TRUS</u></p> <p>From: 01-Jul-21 To: 03-Oct-21</p>	<p><u>CNIR</u></p> <p>Incorrect average daily consumption for one ICP.</p> <p><u>TRUS</u></p> <p>One incorrect negative daily consumption value sent. Five ICPs with the incorrect last read type of "E". Two CS file sent with a read for the date of the switch event.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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><u>CNIR</u></p> <p>The CS file calculated a zero average daily load for ICP 0000103425TREA9 based on a very rare situation. A switch event occurring on the same day as a meter downgrade (Half Hourly to Non-Half Hourly). We have not taken actions to resolve this issue.</p> <p><u>TRUS</u></p> <p>Trustpower agrees to the findings.</p> <p>Incorrect Negative Daily Consumption Value – The ICP 0000901347TUEDC final was billed with the incorrect data. This is human error by a call centre agent. There is a validation in GTV that picks up negative read on reads; however, this was overridden. Training docs are available for all agents in regards to billing finals and validations to help mitigate these errors.</p> <p>Five CS Files with incorrect read type of E – The invoicing was created by a system upload rather than an individual in preparation for the switch to CNIR. No further action required.</p> <p>Two CS file sent with a read for the date of the switch event.</p> <p>0001113435WM490 – User error here. New meter installed and connected for same date as requested date. Correction applied using 2/07/2021.</p> <p>5406004000CHEA0 – human error this was picked up by the administrator quickly and amended.</p> <p>No further action required as there are robust controls and systems in place.</p>	<p>Done</p> <p>4/2022</p> <p>Done</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u></p> <p>Regular Monitoring will take place to ensure that these scenarios are rare. The Average Daily Load calculation is automated within Gentrack and is tested and reliable.</p> <p><u>TRUS</u></p> <p>Incorrect Negative Daily Consumption Value – Discussions with Billing team had to negate negative reads occurring. Billing to regularly review training documentation and keep available to CEA's highlighting importance of approving validations.</p> <p>Five CS files with E status - this was a unique process created for the switch of large commercial sites to CNIR and there should be no further instances of non-compliance.</p>	<p>Ongoing</p> <p>April/2022</p> <p>Done</p>	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 of Schedule 11.3 From: 19-Aug-21 To: 11-Nov-21	TRUS Six RR breaches. 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, as the processes in place mitigate risk are robust. The potential impact is low as the number of ICPs affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Trustpower agrees to the findings. Switching: We will continue to send late RRs only if it deems more important for our customer. GTV does display a warning box if you are about to send a RR that is over 4 months old. Billing: We have implemented some changes to our billing processes after our 2021 audit findings. <ul style="list-style-type: none"> We have increased the number of units Trustpower absorbs, before requesting a Switch Read Adjustment. Implemented an approval process where all switch read adjustments over 4 months have to be approved by the Billing TL & the Switching TL. We only request RR's outside of the 4-month mark if it is in the customer's best interest. Reporting built to identify customers who have switched in on an estimate, to capture possible issues earlier. 	Complete Completed March 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Switching: All RR requests outside of 4 months need to be reviewed and authorised by a Team Leader. Late RR's are only requested if they are of benefit to the customer. GTV has a flag that alerts the user that RR's are outside of 4 months so they can't be requested in error. Billing: We review our processes on a regular basis to ensure they are still fit for purpose and remain in everyone's best interest.	Ongoing Ongoing	

Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.12</p> <p>With: Clause 14 of Schedule 11.3</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21</p> <p>To: 01-Dec-21</p> <p><u>TRUS</u></p> <p>From: 01-Mar-21</p> <p>To: 26-Nov-21</p>	<p><u>CNIR</u></p> <p>25 HH switch requests sent with the incorrect profile of GXP.</p> <p>13 Category 2 AMI sites requested as a HH switch.</p> <p><u>TRUS</u></p> <p>All HH switch requests sent with the incorrect profile of GXP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as there is now reporting in place to identify and get these corrected.</p> <p>The potential impact is low as the number of ICPs affected is minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u></p> <p>Gentrack has been enhanced so that GXP profiles are NOT used as a default for HHR Switches and New Connections. This enhancement will be released into Production following Separation 1 May 2022. All HH switch requests will be sent with the correct profile of HHR.</p> <p>A system and training issue was identified and Category 2 ICPs (that were to be billed with a HHR profile) were being selected with a HH switch type.</p> <p><u>TRUS</u></p> <p>A ticket to fix this process was raised in 2021 however a decision was made not to proceed as Trustpower are no longer gaining, connecting, or servicing Half Hour TOU ICPs.</p>	<p>Done</p> <p>11/2021</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u> Additional training and knowledge sharing has been provided. Documentation has been enhanced.</p> <p><u>TRUS</u> As we will no longer be gaining, connecting, or servicing Half Hour TOU ICP's there should be no further instances of non-compliance.</p>	<p>Done</p> <p>11/2021</p>	

Losing trader provision of information - gaining trader switch			
Non-compliance	Description		
<p>Audit Ref: 4.13</p> <p>With: Clause 15 Schedule 11.3</p> <p><u>CNIR</u></p> <p>From: 01-Jan-22</p> <p>To: 01-Jan-22</p> <p><u>TRUS</u></p> <p>From: 14-Sep-21</p> <p>To: 12-Oct-21</p>	<p><u>CNIR</u></p> <p>Three incorrect AN codes for HH switches.</p> <p><u>TRUS</u></p> <p>ICP0002272113ML5AB was issued incorrectly with the MU (unmetered load) due to human error.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</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><u>CNIR</u></p> <p>AN response codes are selected manually from a dropdown list. Additional training and knowledge sharing has been provided. Documentation has been enhanced.</p> <p><u>TRUS</u></p> <p>We agree that the MU code was issued incorrectly due to human error</p>		<p>Done</p> <p>03/2022</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p><u>CNIR</u></p> <p>AN response codes will be monitored on a regular basis to check for any further non-compliances.</p> <p><u>TRUS</u></p> <p>As we will no longer be gaining, connecting, or servicing Half Hour TOU ICP's there should be no further instances of non-compliance in this area.</p>		<p>Ongoing</p> <p>11/2021</p>	

Withdrawal of switch requests	
Non-compliance	Description
<p>Audit Ref: 4.15</p> <p>With: Clause 17&18 of schedule 11.3</p> <p>From: 17-Mar-21</p> <p>To: 05-Nov-21</p>	<p><u>TRUS</u></p> <p>Three incorrect NW codes found of the sample checked.</p> <p>One NW request sent in error.</p> <p>One WR breach.</p> <p>13 SR breaches.</p> <p>35 NA breaches.</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 recorded as strong as they mitigate risk to an acceptable level.</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>Trustpower agrees to the findings here.</p> <p>Three incorrect NW codes selected. All ICP's 1002138585LC08F, 0431963096LC44A, 0001250100TG8A8 were sent with the DF code as the customers could not move on their original move date due to COVID. Training documents have been updated, and training delivered to ensure that administrators select the CE code for these instances.</p> <p>NW request sent in error as CX. The RA team requested the incorrect account due to a data entry error. No further action required.</p> <p>WR Breach - 1002144098UNB51: PSNZ NTMI received on the 12/10/2021, TRUS NW sent and rejected by PSNZ on the 12/10. The requested switch gain date was the 16th which meant if we had sent the CS within 2 days of receiving the NW rejection, we would have breached for it being prior to the event date.</p> <p>This ICP was worked to be compliant with the CS being sent 5 days after receiving the NT. Reporting is in place to capture these so that action can be taken to prevent a breach, but this ICP did not appear on the report. A support ticket for analysis has been logged with the COBU analytics team to check the logic of report and if there are any further instances.</p> <p>13 SR Breaches – Time needed to investigate and confirm withdrawals and negotiate double withdrawals to remove TRUS time slice.</p> <p>35 NA breaches - we will continue to send late NW files when it is important to make corrections that will otherwise detrimentally impact our customer.</p>	<p>04/2022</p> <p>Completed</p> <p>10/2022</p> <p>Completed</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>1002138585LC08F, 0431963096LC44A, 0001250100TG8A8 – Training documents to be updated and training to be delivered to ensure that we are selecting the correct NW codes in all instances.</p> <p>NW request sent in error as CX 0195112865LC913 – no further action required.</p> <p>WR Breach 1002144098UNB51 – A support ticket will be logged to analyse the logic and effectiveness of the reporting we have in place. particular instance was missed through the BI reporting system not working on that day.</p> <p>We will continue to send late NW files when it is vitally important to make corrections that will otherwise detrimentally impact our customer.</p>	<p>4/2022</p> <p>Completed</p> <p>10/2022</p> <p>Ongoing</p>	

Metering information			
Non-compliance	Description		
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 01-Oct-21 To: 03-Oct-21	TRUS Five ICPs with the incorrect last read type of "E". Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, as the processes in place mitigate risk are robust. 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
Trustpower agrees with the findings. Five CS Files with incorrect read type of E – the invoices are showing as calculated which means that the E status is correct in the switch file however the AMI reads were available at the time of invoicing. This was done as a bulk upload process in preparation for the switch to CNIR. No further action required.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Five CS files with E status – no further action required. This was a unique process created for the switch of large commercial sites in bulk to CNIR and there should be no further instances of non-compliance.		Complete	

Maintaining shared unmetered load			
Non-compliance	Description		
Audit Ref: 5.1 With: Clause 11.14 From: 01-Mar-21 To: 26-Nov-21	TRUS Two ICPs with the incorrect shared unmetered load recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate due to the change of staff, training is planned to bring the new team up to speed. The impact on settlement and participants is minor, as the discrepancies are very small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Shared Unmetered Load UML compliance has been a challenge for our team in recent times however the future looks brighter in this area. We now have Power BI discrepancy reporting in place (screenshot attached), have recently trained two of our newer team members in the task, and with the move of the Chorus sites to Manawa Energy, the workload in this space is significantly more manageable. 0000540598TU2BD – Logged for correction by the RA team 0900086782PC61A – Logged for correction by the RA team		Completed June 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We now have the capacity and capability to identify and correct shared unmetered load discrepancies in a timely manner.		Completed	

Unmetered threshold			
Non-compliance	Description		
Audit Ref: 5.2 With: Clause 10.14 (2)(b) From: 01-Oct-21 To: 01-Apr-22	CNIR Unmetered load threshold exceeded for nine ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong, as unmetered thresholds are monitored and managed with robust controls. The impact is assessed to be low as these are historic ICPs and the load is known and is being reconciled correctly.		
Actions taken to resolve the issue		Completion date	Remedial action status
CNIR The nine ICP's identified have been reviewed and determined cost and access issues make these sites prohibitive to meter, therefore an exemption request has been submitted to the EA. These are waiting on the EA process to complete to grant the exemption.		Completed Sep 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting is in place to capture any unmetered sites that exceed the threshold and a process to evaluate if metering is an option has been established. If not viable then any future sites identified will then have an exemption request completed and submitted to the EA for Review		Completed	

Unmetered threshold exceeded			
Non-compliance	Description		
Audit Ref: 5.3 With: Clause 10.14 (5) From: 01-Oct-21 To: 01-Apr-22	<p>CNIR</p> <p>Nine ICPs with an unmetered load greater than 6,000kWh per annum not resolved within 20 business days of the exemption expiring.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as strong, as unmetered thresholds are monitored and managed with robust controls.</p> <p>The impact is assessed to be low as these are historic ICPs and the load is known and is being reconciled correctly.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CNIR</p> <p>The nine ICP's identified have been reviewed and determined cost and access issues make these sites prohibitive to meter, therefore an exemption request has been submitted to the EA.</p> <p>These are waiting on the EA process to complete to grant the exemption.</p>		Completed Sep 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting is in place to capture any unmetered sites that exceed the threshold and a process to evaluate if metering is an option has been established. If not viable then any future sites identified will then have an exemption request completed and submitted to the EA for Review		Completed	

Distributed unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.4</p> <p>With: Clause 11 Schedule 15.3</p> <p>From: 01-Oct-21</p> <p>To: 01-Apr-22</p>	<p>CNIR</p> <p>Errors found in 14 databases, one database still to be audited and three audits are overdue.</p> <p>For those completed the specific findings are detailed in the DUML database audit reports.</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 effectiveness of the controls is recorded as moderate as Manawa actively works with its DUML customers to provide complete and accurate information.</p> <p>The impact on settlement is major because the incorrect submission figures are major when considered across all databases.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We continue to see most of our DUML issues occur on databases and processes with NZTA. The EA is aware of the ongoing issues that all retailers are having with NZTA. We continue to commit significant resource to try and resolve these issues and have recently taken a 'top down' approach – working more closely with the Wellington office of NZTA to try and standardise and improve processes across the group.</p> <p>As noted – we manage 17 DUML databases and despite challenges have made improvements in processes and data accuracy across the year – with the majority of our DUML databases being well managed.</p> <p>Speaking specifically to the audits that are overdue/incomplete.</p> <p>NZTA West Waikato and Taupo</p> <p>We have tried for some time to get support from the customer to provide information for the NZTA West Waikato DUML audits.</p> <p>The comments below are feedback from a recent follow up between Trustpower and Veritek to get these progressed:</p> <p><i>“The Waikato and Taupo NZTA audits have been unable to be progressed due to no database being provided. I have been liaising with NZTA to getting a database extract but nothing has been forthcoming as yet. They were undertaking a 100%</i></p>	Ongoing	Investigating

<p><i>field audit last time I contacted them in July 2021. We are happy to assist with getting data but I would expect Trustpower to also be working with the clients to progress these.”</i></p> <p>We can confirm that a full field audit has taken place (2021) and was provided to Trustpower in early 2022. We have carried out extensive reconciliation work to compare new and existing data and continue to work with the customer on this. Complicating the matter is a lack of resource within NZTA to respond to questions, and the fact that NZTA are currently in market looking for a new supply agreement - as their contract with Trustpower has expired.</p> <p>NZTA Otago - OtagoNet</p> <p>We have located a previous audit completed on this DUML by Veritek in 2015. The DUML covers 3 ICPS. As stated in our previous participant audit – a number of the lights (under at least 2 of the 3 ICPS in the OtagoNet DUML) were covered by other DUML audits. NZTA lights in the Clutha District Council (CDC) have been included in the CDC RAMM database as confirmed in their recent audit. These lights will now be managed under that DUML database.</p> <p>Similarly, Trustpower has identified that NZTA lights in the Waitaki District Council (WDC) jurisdiction exist in a DUML database managed by WDC.</p> <p>The remaining fitting details are few. We have discussed with PowerNet (Distributor for Otagonet), a plan to establish individual UML ICP’s for each of the remaining lights.</p>		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Overall, Trustpower believe we have good governance in place, we know what audits are required, when and what the issues are, and we monitor this via a monthly governance meeting.</p> <p>We successfully manage a number of council, contractor and other 3rd party relationships and there have been material corrections made in a number of areas.</p> <p>We have strong internal capability in terms of understanding requirements, and effective DUML management process. While we have ongoing challenges with NZTA in particular – these are well known to the EA. As outlined above, we continue to take practical steps to correct data and processes.</p>	<p>Ongoing</p>	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24</p> <p>From: 06-Jan-21</p> <p>To: 08-Dec-21</p>	<p>TRUS</p> <p>Some ICPs with distributed generation not quantified.</p> <p>While meters were bridged, energy was not metered and quantified according to the code for 40 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	
Low	<p>Controls are rated as moderate as they will mitigate risk most of the time but there is room for improvement in relation to distributed generation.</p> <p>Submission information is estimated for the bridged period in most cases, so the impact on submission accuracy is considered low and the volume of unaccounted for distributed generation is expected to be low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Location management: ICP# 0011002947PCD94 has been corrected by the Network since audit.</p> <p>Data will be pulled to identify sites that do not have IMP/EXP metering installed with no open meter change service order and these will be worked through with customers/Networks to have IMP/EXP metering installed.</p> <p>Revenue Assurance: Bridged meters</p> <p>0000414945TPD12 – site was bridged on reconnection 01/08/21 – bridged meter follow up logged 11/08/21 – paperwork confirming meter unbridged received 15/09/21. As the ICP had switched to an alt provider on 03/09/21 we were unable to ascertain any current or historic reads. No RA case was able to be completed.</p> <p>1000007390BPCBB – site was bridged on reconnection 11/08/21 – bridged meter follow up logged 16/08/21. This job was cancelled due to Covid Level 4 lockdown and then relogged 03/09/21. We received paperwork 27/09/21 confirming meter unbridged 08/09/21. The ICP had switched to an alt provider on 27/09/21 and as we were unable to ascertain any current or historical reads, no RA case was able to be completed.</p>	<p>Done</p> <p>April 2022 and ongoing</p> <p>Completed</p> <p>Completed</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Along with data being pulled to rectify historical sites without IMP/EXP metering our process will also change so that all sites with generation will have an IMP/EXP meter installed regardless of gifting etc.</p> <p>Revenue Assurance: Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p>	<p>April 2022 and ongoing</p> <p>Ongoing</p>	

Reporting of defective metering installations			
Non-compliance		Description	
Audit Ref: 6.4 With: Clause 10.43(2) and (3) From: 26-Jun-19 To: 21-Feb-22		TRUS MEP not notified for three ICPs where metering installations could be inaccurate, defective, or not fit for purpose Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue			Completion date
Defective meter detection 0000252550WT7EC – transposed reads investigation commenced – still in progress 0000460349WT61D – supply for house construction site - customer confirmed power not being used – meter since replaced – No RA issue 1000003149BP32F – meter reader alert first raised 09/09/20 – property disconnected 10/08/20 – and as we were unable to ascertain any current or historic reads, no RA case was able to be completed. However as a result of the audit we have opened a RA case to calculate and submit the consumption for this ICP.			Ongoing Completed Ongoing
Preventative actions taken to ensure no further issues will occur			Completion date
We acknowledge that our current reporting capability in this area doesn't allow us to identify stopped meters in a timely manner. We will continue to look at viable options to counter this inefficiency.			Ongoing

NHH meter reading application			
Non-compliance	Description		
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 01-Oct-21</p> <p>To: 03-Oct-21</p>	<p>TRUS</p> <p>Five ICPs with the incorrect last read type of "E".</p> <p>Disconnection reads applied to the day before the disconnection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong, as there are robust checks in place to mitigate risk.</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>Trustpower agrees with the findings.</p> <p>Five CS Files with incorrect read type of E – the invoices are showing as calculated which means that the E status is correct in the switch file however the AMI reads were available at the time of invoicing. This was done as a bulk upload process in preparation for the switch to CNIR. No further action required.</p>		Complete	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Five CS files with E status – no further action required. This was a unique process created for the switch of large commercial sites to CNIR and there should be no further instances of non-compliance.</p>		Complete	

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21</p> <p>To: 31-Jan-22</p> <p><u>TRUS</u></p> <p>From: 01-Mar-21</p> <p>To: 31-Dec-21</p>	<p><u>CNIR</u></p> <p>Exceptional circumstances not proven for nine ICPs not read during the period of supply due to the short period of supply.</p> <p><u>TRUS</u></p> <p>Exceptional circumstances not proven for two of a sample of five ICPs not read during the period of supply.</p> <p>Potential impact: Low</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	
Low	<p>The controls are recorded as weak, as this process is still being refined for CNIR and I have recommended the process is reviewed to improve the controls.</p> <p>The audit risk rating is low as the number of ICPs not read during the period of supply is very small.</p>	
Actions taken to resolve the issue		Completion date
<p><u>CNIR</u></p> <p>Manual checks are now being made as part of the switch loss process. The admin team will NOT allow a switch to progress without checking if a read has been obtained and ensuring best efforts are made to obtain one, including contact the Account Manager and placing clear memos notes in Gentrack.</p> <p><u>TRUS</u></p> <p>We agree this is non-compliant. However, this remains a rare occurrence and we do not currently have the current resource/ability to monitor these sites where a customer moves out prior to our meter readers accessing the site.</p>		<p>Ongoing</p> <p>Ongoing</p>
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u> Enhancement Ticket logged with Gentrack MEPPS-369 A Switch Loss Service Order Queue will open in Gentrack is there is no read during period of supply (looking over ONLY CNIR period).</p> <p>More emphasis in place to obtain reads across a smaller database of customers and to address historical inherited issues on hard to access sites.</p> <p><u>TRUS</u> Ticket logged to investigate the viability of sending automated SMS/Email messages when a customer's property is skipped by the meter reader.</p> <p>Ticket logged to review changes we could make to our bills, to better highlight when a customer has been estimated.</p>	<p>June 2022</p> <p>Ongoing</p> <p>September 2022</p> <p>September 2022</p>	

NHH meters 90% read rate			
Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Oct-21 To: 31-Jan-22	<p>CNIR</p> <p>Exceptional circumstances not met for six of the potential 685 ICPs on NSPs with a less than 90% read rate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as weak, as this process is still being refined and I have recommended the process is reviewed to improve the controls.</p> <p>The audit risk rating is assessed to be low but has a potential to be medium due to the flow on effect to submission accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Our C&I specialists are regularly reviewing reporting and contacting Meter Reading Services with meter information as well as our Account Managers to gain information from the customers.		01/10/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Process to be reviewed with Account Managers to gain more of a visual to wider teams of the attempts made to contact customers.		01/06/2022	

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3) Schedule 15.2</p> <p>From: 01-Oct-21</p> <p>To: 03-Oct-21</p>	<p>TRUS</p> <p>Five ICPs with the incorrect last read type of "E".</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong, as there are robust checks in place to mitigate risk.</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>Trustpower agrees with the findings.</p> <p>Five CS Files with incorrect read type of E – the invoices are showing as calculated which means that the E status is correct in the switch file however the AMI reads were available at the time of invoicing. This was done as a bulk upload process in preparation for the switch to CNIR. No further action required</p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Five CS files with E status – no further action required. This was a unique process created for the switch of large commercial sites to CNIR and there should be no further instances of non-compliance.</p>	Completed	

Meter data used to derive volume information		
Non-compliance	Description	
<p>Audit Ref: 9.3</p> <p>With: Clause 3(5) of schedule 15.2</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21</p> <p>To: 31-Jan-22</p> <p><u>TRUS</u></p> <p>From: 01-Apr-21</p> <p>To: 22-Feb-22</p>	<p><u>CNIR and TRUS</u></p> <p>Raw meter data is rounded upon receipt and not when volume information is created.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 for HHR data are strong but there are no controls to prevent rounding of NHH raw meter data, the system is designed to round as soon as the data arrives. Overall, the controls are rated as moderate.</p> <p>There is no impact because no metered consumption information is “missing”, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u></p> <p>Manawa accepts these finding and is investigating options to resolve the rounding issue.</p> <p>The system changes required will be reviewed in conjunction with the wider use of AMI data within Manawa (Including HHR data, Event files etc) and changes made once the solution is scoped.</p> <p><u>TRUS</u></p> <p>Trustpower accepts these finding.</p> <p>We have recently scaled our MDM solution to include all AMI networks.</p> <p>We agree that AMI decimal data is now available, but not yet integrated.</p>	<p>Ongoing</p> <p>18/03/2022</p> <p>Ongoing</p>	<p>Investigating</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u></p> <p>Manawa will be reviewing and scoping changes and the extended use of the AMI datasets, once the Mercury sale and all separation activities have been completed.</p>	<p>Dec 2022</p>	
<p><u>TRUS</u></p> <p>We are scoping the integration of MDM to GTV, this has been delayed from NOV 2022 due to the sale to Mercury being rescheduled by 6 months.</p>	<p>April 2023</p>	

Electronic meter readings and estimated readings		
Non-compliance	Description	
<p>Audit Ref: 9.6</p> <p>With: Clause 17 Schedule 15.2</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21</p> <p>To: 31-Jan-22</p> <p><u>TRUS</u></p> <p>From: 01-Apr-21</p> <p>To: 21-Feb-22</p>	<p><u>CNIR</u></p> <p>Event information is not analysed and acted upon.</p> <p><u>TRUS</u></p> <p>Event information is not analysed and acted upon for all MEPs.</p> <p>Voltage on the load side of the meter should be obtained and evaluated.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak as meter events reporting is not reviewed.</p> <p>The audit risk rating is low as the number of ICPs affected by not monitoring meter event reporting is expected to be low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u></p> <p>Manawa are working to get the management of the meter event reporting in place.</p> <p>Event data is downloaded from the MEP's and referred to as required on an ad-hoc basis, but the intention is to validate this data in a similar fashion to the C&I data, which will include the use of the event logs as part of that process</p> <p><u>TRUS</u></p> <p>Trustpower agrees with the findings.</p> <p>Our Analytics team have built a report in PowerBI to make this process a more manageable task, this has been handed to our Revenue Assurance team with recommendations to check that the report is fit for purpose on a regular basis.</p> <p>IHUB now monitor AMI events from their end, sending us service request orders to raise for all critical events and then following up with a monthly summary report, with all AMI events requiring a service request.</p>	<p>Ongoing</p> <p>March 2022</p> <p>Dec 2021</p>	<p>Investigating</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u> Manawa are working to get meter event reporting in place, this will continue to be improved as more use is made of the AMI dataset.</p> <p><u>TRUS</u> Revenue Assurance will be monitoring the Power BI report for its success and will be making any amendments identified over the coming months.</p>	<p>Ongoing</p> <p>Ongoing</p>	

ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2 With: Clause 15.6</p> <p><u>CNIR</u> From: 01-Oct-21 To: 31-Jan-22</p> <p><u>TRUS</u> From: 01-Jan-21 To: 31-Mar-21</p>	<p><u>CNIR</u> Incorrect ICP days for seven ICPs.</p> <p><u>TRUS</u> ICP days submitted for generation only ICPs.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong as controls have been improved to identify discrepancies going forward.</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><u>CNIR</u> The non-compliances related to the generation only HHR sites will be rectified as the revision cycles roll through.</p> <p>The non-compliances related to the incorrect submission flags has been rectified by updating the registry.</p> <p><u>TRUS</u> The existing revision cycle will replace with updated ICP days files. File creation code has been enhanced to eliminate the need for a load meter to be onsite in order for inclusion in the ICP days file</p>	<p>Complete</p> <p>Complete</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u></p> <p>The non-compliances related to the generation only HHR sites were identified prior to the audit and a fix was implemented before the on-site audit took place.</p> <p>Non-compliances related to incorrect submission flags will now be identified through reporting that is being attended to daily.</p>	Complete	
<p><u>TRUS</u></p> <p>A step in the submission file check process detects any consumption loaded against generation only profile in AV-080 file. This enables identifying affected Transmission point(s) and ICP(s). Investigation of the cause and correction will be carried out prior to the file submission.</p>	Complete	

Grid connected generation			
Non-compliance	Description		
Audit Ref: 12.6 With: Clause 15.11 From: 01-Oct-21 To: 07-Oct-21	Both TRUS and CNIR codes in the NSP vols file for the period October 1 st to 7 th . Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk to an acceptable level and were improved immediately after this issue. 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
Upon being advised of the error we investigated immediately. We identified where the issue had occurred, corrected the offending file, and resubmitted within 3 hours. This was done prior to the publication of October 2021 3-month reconciliation reports.		Done	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We identified that the zero-out portion of our market submission process omitted volumes included in our AV-130 submission. We have since included AV-130 volumes to our zero-out process. In addition, where possible we intend to make future NSP changes effective from the beginning of a month to avoid part-month submissions. Process notes have also been updated to note that where this cannot be achieved AV-130 files are to remain separate.		Ongoing	

Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 25-May-18</p> <p>To: 22-Nov-21</p>	<p><u>TRUS</u></p> <p>Corrections not conducted for two ICPs where meters were bridged.</p> <p>13 new ICPs had the incorrect active status dates of the samples checked:</p> <ul style="list-style-type: none"> • 11 ICPs temporarily electrically connected but not made active resulting in the volumes being reconciled for the incorrect period, • ICP 1002108871LC5B6 made active to replace an incorrectly decommissioned ICP for 25/5/19 on 4/05/21 resulting in an estimated 1,310 kWh under submission as the volumes from May 19-February 2020 have not been recoiled as they are beyond the 14-month revision cycle, and • ICP 1000599753PCDB2 made active to on 16/04/21 was found to have an existing electrically connected meter on site and is likely to have been consuming since mid-2018 resulting in under submission. <p>ICP 0151745161LC3F3 was incorrectly backdated to “inactive” on 15 April 2021 for 25 June 2020 due to human error and reversed to “active” during the audit resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted.</p> <p>Two ICPs not active for the correct date as the NT request date was after the reconnection date resulting in consumption being reconciled to the incorrect period.</p> <p>One example of a disconnection read not being entered resulting 10kWh of under submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 because they ensure risks are mitigated to an acceptable level.</p> <p>The potential impact is low based on the kWh impact</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Reconciliation:</p> <p>Reconciliation has no visibility over these ICP level of errors unless they result in significant discrepancy in consumption compared with previously submitted consumption. In that case, we investigate it and work with teams responsible to rectify prior to the submission.</p> <p>New Connections:</p> <p>A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections.</p> <p>Human error – provided as a training opp. Logged ticket. Refer: 3.9</p> <p>ICP 0151745161LC3F3 was incorrectly backdated to “inactive” on 15 April 2021 for 25 June 2020 due to human error and reversed to “active” during the audit resulting in the volumes for the R14 revisions for the months of July to November 2020 not being submitted.</p>	<p>Ongoing</p> <p>March 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>New Connections: A gap in knowledge was identified during the Audit around temporarily connected sites. Training will be done within the relevant teams, specifically New Connections to improve our process around temporary connections so that the correct CO date is added even if only CO for certification.</p> <p><u>Revenue Assurance:</u></p> <p>Bridged meters: Best efforts are used where possible for resolution controls. If data is not available, we can now use historical reads ascertained from the registry to estimate any unbilled consumption.</p>	<p>March 2022</p> <p>Ongoing</p>	

Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Apr-20 To: 31-May-21	<u>TRUS</u> Some FE thresholds not met in some instances. 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	Controls are rated as strong as they mitigate risk to an acceptable level. The audit risk rating is low as the Initial data is replaced with revised data and washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
Read attainment was impacted by COVID-19 restrictions and accuracy reduced. The implemented end-of-month read for the AMI sites we did have reliable data and easing back into normality will increase our read percentage & accuracy markedly."	Complete	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
AMI rollouts have increased, with more than 200k sites now possessing AMI meters. Combined with the ongoing use of the EOM read process has resulted in a more robust process should similar events happen in the future.	Ongoing	

Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p><u>CNIR</u></p> <p>From: 01-Oct-21 To: 31-Jan-22</p> <p><u>TRUS</u></p> <p>From: 01-Feb-21 To: 31-Aug-21</p>	<p><u>CNIR and TRUS</u></p> <p>Historic estimate thresholds were not met for the two R3 revisions submitted.</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 as there is room for improvement.</p> <p>The audit risk rating is low as percentage of HE overall is greater than the required 80%.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><u>CNIR</u></p> <p>As the uptake of AMI increases this will reduce the issue.</p> <p>We continue to monitor the FE volumes.</p> <p><u>TRUS</u></p> <p>Our R3 HE percentages have increased markedly largely because of the AMI rollout.</p> <p>The scenario that causes the non-compliance (embedded networks with a mix of high & low consumption sites and the high consumption site has restricted access) is still present. COVID-19 restrictions had notable impact on obtaining reads from these sites.</p> <p>We continue to monitor the FE volumes</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p><u>CNIR</u> As the access restrictions attributed Covid-19 begin to ease, our meter readers are now able to access meters previously unavailable. The AMI rollout will also continue to improve this metric.</p> <p><u>TRUS</u> Our metering services team continue to progress on unread / restricted access sites that flow through to rectifying these scenarios. Also, the AMI rollout is continuing to have a positive impact on these volumes. Monthly reports that contain list of ICPs which have high consumption but low HE will be provided to Bill Data team post each R3 and R7 submission from April 2022. This will help the team prioritise read attainment from the ICPs that would make meaningful impact on improving HE proportion in submission data.</p>	<p>Ongoing</p> <p>Ongoing</p>	