

Compliance plan for Flick Energy Limited 2022

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Nov-21</p> <p>To: 21-Sep-22</p>	<p>Some registry data is incorrect.</p> <p>Switch estimate reads provided by losing trader not used by Flick for two ICPs resulting in incorrect submission of 16 kWh.</p> <p>HHR actual data replaced by inaccurate estimate where RR file rejected, and interval data is estimated and scaled to align with CS read estimate.</p> <p>Backdated switch for ICP 0002401989EN1D8 (8 June 2019) resulted in 13,316 kWh not being included in the submission process.</p> <p>Actual HHR interval data automatically replaced with estimates where check sum validation identifies a difference of more than ± 1 kWh where the accuracy of the received midnight reads is not investigated prior to the data correction.</p> <p>One ICP (0002401989EN1D8) which was assigned HHY profile has not met the terms of the profile, particularly the requirement to be upgraded to HHR profile within 16 weeks.</p> <p>Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly.</p> <p>The impact is assessed to be medium due to the volume missing from the submission process for which will not be updated as the revision process has already occurred for the affected periods.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>Safety Net process will be enhanced to ensure that it picks up all the registry discrepancies including IECD (Initial Electrically connected) dates.</p> <p>Retraining has been provided to the switch team on the RR process. An attempt will be made to correct the RR read.</p> <p>An escalation process has been implemented in the switching team for requests for all withdrawals exceeding the 14-month mark to be escalated to the Operations Manager. Withdrawals over the 14 months will not be initiated or accepted.</p> <p>The unvalidated HHR data is not replaced but marked as an estimated in the system. An attempt will be made to implement changes to the system, so it enables the unvalidated date to be marked as “unvalidated” rather than an estimate.</p> <p>We could not meet the HHY profile term for ICP 0002401989EN1D8 due to the switch being backdated. The backdated term had already passed the 16 weeks’ timeframe.</p>	<p>24/12/2022</p>	<p>Investigating</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Monthly Operations QA has been implemented to assess and monitor all the processes above.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits</p>	<p>Ongoing</p>	

Data transmission		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 20 Schedule 15.2 From: 01-Nov-21 To: 21-Sep-22	Consumption volume for ICP 1920003000CHB8E differs between HHRAGGS and the received values from the AMI MEP. 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, because Flick systems have audit trails in place to track changes to consumption information. The audit risk rating is low as the volume impact on reconciliation is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
This issue has been raised with our Tech team who are investigating the reason for this discrepancy between HHRAGGS and the received values from the AMI MEP for ICP 1920003000CHB8E.	20/12/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly Operations QA has been implemented which will include the above process to be assessed.	Ongoing	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 01-Nov-21 To: 21-Sep-22	15 ICPs did not have their meters certified on reconnection. 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, because Flick identifies uncertified meters as part of their safety net checks and follows up uncertified meters with the MEP. The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
The above mentioned ICPs had meters which were owned by ARC. Flick received an email confirmation from AMS which stated that EA had provided ARC with an exemption on the certification of ARC meters. Our safety net check spits out all the ICP's requiring re-certification within a month, and these are escalated to the MEP's.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We can only identify and escalate all uncertified ICPs to the MEP's. We are dependent on the MEP's on re-certifying the sites.	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Nov-21</p> <p>To: 21-Sep-22</p>	<p>29 late status updates to active status.</p> <p>13 late status updates to inactive status.</p> <p>36 late trader updates.</p> <p>One late ANZSIC code update for a switched in ICP.</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 because they are adequate to ensure that the registry is updated on time most of the time, but there is room for improvement.</p> <p>The risk is low as most updates were completed on time or soon after they were due, unless they were backdated corrections.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Some of the late trader updates and status updates were due to the inability to update registry while an ICP is in switch. This issue needs to be resolved through the Switch process review process by the authority.</p> <p>An "Inactive ICP has Active Energy Throughput" report has been created which runs daily and reports on all inactive ICPs that show consumption. This report is investigated and dealt by our operations team on a daily basis. This will eliminate most of the status update non-compliance which occurs due to manual error.</p> <p>Late ANZSIC codes update cannot be fully resolved as this is dependent on customers advising us of correct ANZSIC when signing up. The non-compliance is due to the backdated date used to correct registry records. If current date was used to update the ANZSIC code, then incorrect records will be reflected in the registry.</p> <p>The correction of ANZSIC codes is dependent on customers advising us their end use during sign up. We do run a report each month to identify ANZSIC discrepancy through the price category codes but this has its limitations as we are only able to identify business or residential end use and not the type of business on site.</p>	Ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We cannot fully eliminate this non-compliance, but this process will be monitored through our monthly Operations QA.	Ongoing	

Provision of information to the registry manager			
Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 01-Nov-21</p> <p>To: 21-Sep-22</p>	<p>13 late status updates for new connections.</p> <p>Six ICPs had incorrect active status events dates that required correction.</p> <p>Potential impact: Low</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 the late updates decreased as the audit period progressed and one data discrepancy was identified.</p> <p>The impact is assessed to be low, based on the ICPs affected and number of days late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>An additional check will be included in the safety net to monitor the new connection status update process.</p> <p>Training has been provided to the team on the timeliness and accuracy of the new connection and active status updates.</p>		24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Monthly Operations QA has been implemented to assess and monitor all the processes above.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.</p>		Ongoing	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k) of Schedule 11.1</p> <p>From: 01-Nov-21</p> <p>To: 21-Sep-22</p>	<p>The ANZSIC code for 13 ICPs were confirmed as being incorrect. The code was corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are moderate as ANZSIC code are not being confirmed with the customer during the sign-up process for all business customers.</p> <p>There is no impact on other participants or settlement, but there is a minor impact on the Authority because this information is used for reporting.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The accuracy of ANZSIC codes is dependent on customers advising us of their correct end use. We do run a report each month to identify ANZSIC discrepancy through the price category codes but this has its limitations as we are only able to identify business or residential end use and not the type of business on site.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We cannot fully eliminate this non-compliance, but this process will be monitored through our monthly Operations QA	Ongoing	

Management of "active" status			
Non-compliance	Description		
<p>Audit Ref: 3.8</p> <p>With: Clause 11.18</p> <p>From: 01-Nov-21</p> <p>To: 21-Sep-22</p>	<p>Six ICPs initially had incorrect active status event dates which were subsequently corrected.</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, because the process to update the registry is manual, increasing the likelihood of data processing errors. There are some monitoring controls in place to check that details are recorded correctly at the time the update is processed.</p> <p>The impact is low because there was a small difference between the correct and applied dates, and the errors were corrected during the audit.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Re-training has been provided to the team on the timeliness and accuracy of the active status updates.</p> <p>The incorrect active status event dates has now been corrected.</p>		24/11/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Monthly Operations QA has been implemented to assess and monitor the above process.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.</p>		Ongoing	

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: 01-Nov-21 To: 21-Sep-22	Four ICPs where the OC (Occupied) response code was incorrectly applied for transfer switches. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as the switching process is only partially automated and where users are required to manually intervene and complete the process, they are required to assign the appropriate response code. The manual nature of this process can lead to errors being made. The audit risk rating is low overall as all switches were successfully completed.	
Actions taken to resolve the issue	Completion date	Remedial action status
Re-training has been provided to the operations team on the use of the AN code. This was a manual input error.	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly Operations QA has been implemented to assess and monitor the above process. The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.	Ongoing	

Losing trader must provide final information - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.3 With: Clause 5 Schedule 11.3</p> <p>From: 01-Nov-21 To: 21-Sep-22</p>	<p>At least three transfer CS files contained average daily kWh inconsistent with the requirements of the registry functional specification.</p> <p>Seven CS files had an incorrect last actual read date.</p> <p>One CS file (ICP 0138831025LC74E) had an incorrect read type.</p> <p>Four CS files had an incorrect CS event read.</p> <p>One transfer switch (ICP 0045147391PC9C6) had a last actual read date after the switch event date.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times</p> <p>Controls: Moderate Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are rated as moderate overall. Where files were manually created there were some errors in:</p> <ul style="list-style-type: none"> last actual read dates, where they contained typos or the last day of supply was selected instead of the last actual reading, some read types were incorreced keyed, and some readings were incorrect because the wrong read was entered for the meter, the reading for the wrong date was selected or a typo was made when entering the reading. <p>The audit risk rating is low overall:</p> <ul style="list-style-type: none"> most Flick ICPs have communicating AMI meters and the gaining retailer is likely to receive actual readings soon after the ICP switches in, reducing the likelihood of forward estimate being calculated from the average daily kWh value (in most cases the average daily kWh provided was a reasonable estimate of the ICP's consumption), the last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on submission, all switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact, and the incorrect switch event date was corrected through the withdrawal process and the impact is low.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>We calculate average consumption over the last month rather than the last read to read period. We believe this provides a more accurate figure. We are waiting for the amendments to the switching process proposed by the Switch Technical Group to be finalised before making changes to their processes.</p> <p>Re-training has been provided to the operations team on the accuracy and timeliness of the CS file contents. All the issues above were due to manual error. We are looking at automating the remaining 25% of the switch process which will eliminate this non-compliance</p>	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly Operations QA has been implemented to assess and monitor the processes above.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.</p>	Ongoing	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-Nov-21 To: 21-Sep-22</p>	<p>For four ICPs the actual received read and interval data from the AMI MEP was used for submission purposes and the CS file estimate read was not used.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate, because the process to update Telemetry where an RR is rejected normally ensures that the correct read is applied where an actual AMI read is not already present.</p> <p>The impact is low because the read differences have small impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We believe that the authority should further promote the use of actual data where available. Currently when an RR is rejected with an estimate CS read, Flick uses actual reads for submission and billing purposes. This ensures that customers are billed for their correct consumption.</p> <p>We will continue with the above process and ensure that all CS estimate reads are rejected in a timely manner to eliminate this non-compliance.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Any RR rejected with an estimate CS read will now be monitored through Operations QA and reported to the Compliance Manager who will escalate this to respective retailers.</p> <p>We will also explore options with our Tech team of a possibility of overriding actual data in rare instances</p>	Ongoing	

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 01-Nov-21 To: 21-Sep-22	Seven ET breaches for switch moves. One E2 breach for switch moves. One AN did not have the correct AN response code applied. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. A small number of errors occurred, mainly for manually generated files. The impact is assessed to be low because the switches were completed as expected, and the E2 breaches were close to the expected dates.	
Actions taken to resolve the issue	Completion date	Remedial action status
Re-training has been provided to the operations team on the accuracy and timeliness of the above switch processes. All the issues raised above were due to manual error. We are looking at automating the remaining 25% of the switch process which will eliminate this non-compliance.	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly Operations QA has been implemented to assess and monitor the processes listed above. The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.	Ongoing	

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>From: 01-Nov-21</p> <p>To: 21-Sep-22</p>	<p>At least two CS files contained average daily kWh inconsistent with the requirements of the registry functional specification.</p> <p>16 CS files had incorrect last actual read dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>The controls are rated as moderate overall. At least 75% of switches are created automatically by the provisioning system. No discrepancies between read types and last actual read dates were identified for automatically generated files, and the sample of files checked were accurate apart from average daily kWh, which was calculated based on the previous month, rather than previous actual read to read period. Where files were manually created there were some errors in:</p> <ul style="list-style-type: none"> • last actual read dates, where they contained typos or the last day of supply was selected instead of the last actual reading, • some read types were incorreced keyed, and • some readings were incorrect because the reading for the wrong date was selected, or a typo was made when entering the reading. <p>The audit risk rating is low overall:</p> <ul style="list-style-type: none"> • most Flick ICPs have communicating AMI meters and the gaining retailer is likely to receive actual readings soon after the ICP switches in, reducing the likelihood of forward estimate being calculated from the average daily kWh value (in most cases the average daily kWh provided was a reasonable estimate of the ICP's consumption), • the last actual read date field is used to help assess the accuracy of any estimates provided and has no impact on submission, • all switch event readings should be treated as actual or permanent estimate, so the incorrect read types are expected to have a low impact, and • the impact of the discrepancies between the correct and applied event readings is minor.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>We calculate average consumption over the last month rather than the last read to read period. We believe this provides a more accurate figure. We are waiting for the amendments to the switching process proposed by the Switch Technical Group to be finalised before making changes to their processes. The CS file read date was a manual error and the Operations team has been re-trained on this process.</p>	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly Operations QA has been implemented to assess and monitor the above process.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.</p>	Ongoing	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11 With: Clause 12 of Schedule 11.3</p> <p>From: 01-Nov-21 To: 21-Sep-22</p>	<p>Switch estimate reads provided by losing trader not used by Flick for two ICPs resulting in incorrect submission of 16 kWh.</p> <p>For four ICPs the actual received read and interval data from the AMI MEP was used for submission purposes and the CS file estimate read was not used.</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 rated as moderate, because the process to update Telemetry where an RR is rejected normally ensures that the correct read is applied where an actual AMI read is not already present.</p> <p>The impact is low because the read differences have small impact on submission</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We believe that the authority should promote the use of actual data where available. Currently when an RR is rejected with an estimate CS read, Flick uses actual reads for submission and billing purposes. This ensures that customers are billed for their correct consumption.</p> <p>We will continue with the above process and ensure that all CS estimate reads are rejected in a timely manner.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Any RR rejected with an estimate CS read will now be monitored through Operations QA and reported to the Compliance Manager who will escalate this to respective retailers.</p> <p>We will also explore options with our Tech team of a possibility of overriding actual data in rare instances</p>	Ongoing	

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 01-Nov-21 To: 21-Sep-22	Seven NA breaches. Four NWs were issued in error by Flick and rejected by the other trader. 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	Controls are moderate because the files are processed manually. The incorrect withdrawals were manually created, and the late files were delayed while Flick confirmed that the NWs were required. The audit risk rating is low because a small number of files were affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
We believe the 2-month timeframe allowed for the switch withdrawals is not reasonable and does not meet customer requirements in some instances. We action withdrawal requests as soon as we are made aware of an incorrect sign up or a need for a switch withdrawal. We have raised this with the EA and are awaiting changes through the Switch Technical group. Four NWs were issued in error and retailers were advised to reject this NWs.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
NW process is going to be monitored through the monthly Operations QA and Monthly Compliance reports.	Ongoing	

Metering information		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 01-Nov-21 To: 21-Sep-22	For four CS files issued by Flick, the switch event readings did not reflect the actual reading or estimated reading on the last day of supply. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, all the incorrect readings were in manually created CS files and most CS files are generated automatically by the provisioning system. The audit risk rating is low, based on the kWh difference and that the largest difference was resolved through the RR process.	
Actions taken to resolve the issue	Completion date	Remedial action status
Re-training has been provided to the operations team on the accuracy and timeliness of the CS file contents. All the issues raised above were due to manual error. We are looking at automating the remaining 25% of the switch process which will eliminate this non-compliance	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly Operations QA has been implemented to assess and monitor the processes above. The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.	Ongoing	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13 and clause 15.2 From: 01-Nov-21 To: 21-Sep-22	Four bridged meters were identified during the audit period. Energy was not quantified in accordance with the code during the bridged periods. 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 are sufficient to mitigate risk most of the time. Bridging only occurs where a soft reconnection cannot be performed after hours, and the customer urgently requires their energy supply for health and safety reasons. Corrections are processed to estimate consumption during bridged periods.	
Actions taken to resolve the issue		Completion date
We instruct contractors to bridge meters in exceptional cases to provide customers with power after hour. Bridging only occurs where a soft reconnection cannot be performed after hours, and the customer urgently requires their energy supply for health and safety reasons. Corrections are processed to estimate consumption during bridged periods		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We will not be able to eliminate this non-compliance as in some instances it is essential to bridge the meters to provide power to customers due to health and safety reasons.		Ongoing
Remedial action status		
Identified		

Collection of information by certified reconciliation participant		
Non-compliance	Description	
<p>Audit Ref: 6.5 With: Clause 2 Schedule 15.2</p> <p>From: 01-Nov-21 To: 21-Sep-22</p>	<p>100 (NGCM AMI MEP) ICPs where the time correction exceeded the maximum permitted error, and no review of the raw meter data was conducted to determine if any corrections were required.</p> <p>152 (ARC AMI MEP) ICPs where the time correction exceeded 1,500 seconds and this time correction was then reverted at the next interrogation.</p> <p>19 ICPs not interrogated within the maximum interrogation cycle.</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	
Low	<p>The controls are moderate as while the time difference reports published by the AMI MEPs are not reviewed by Flick to enable an assessment of the impacts of any time corrections on the raw meter data, The AMI MEPs are providing emails regarding specific ICP time difference issues for Flick to review.</p> <p>The audit risk rating is low as the number of affected meters is small and the affected ICPs are metering installation capacity 1 so the affected volumes are quite small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Re-training has been provided to the operations team. The time difference reports received from all retailers through all channels (emails/SFTP server) are going to be reviewed. There was a training issue which led to this non-compliance	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The above process is going to be assessed through the monthly operations QA.	Ongoing	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 Schedule 15.2 From: 01-Nov-21 To: 21-Sep-22	For four CS files issued by Flick, the switch event readings did not reflect the actual reading or estimated reading on the event date. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, all the incorrect readings were in manually created CS files and most CS files are generated automatically by the provisioning system. The audit risk rating is low, based on the kWh difference and that the largest difference was resolved through the RR process.	
Actions taken to resolve the issue	Completion date	Remedial action status
Re-training has been provided to the operations team on the accuracy of switch event readings in the CS file. All the issues above were due to manual error. We are looking at automating the remaining 25% of the switch process which will eliminate this non-compliance	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly Operations QA has been implemented to assess and monitor the above process. The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.	Ongoing	

Half hour estimates		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 15 Schedule 15.2 From: 01-Nov-21 To: 21-Sep-22	<p>Reasonable endeavours not met for ten active long term vacant and non-communicating AMI metered ICPs where zero value estimations are provided for more than 12 months.</p> <p>Flick did not provide their best estimate for at least ten ICPs which did not have estimates generated because there was insufficient history for Telemetry to create an estimate at the time.</p> <p>One ICP (0005003083RNFC5) had a difference of 9.4 kWh between the interval data consumption and the meter reads for the month of the meter change.</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 moderate, estimates are created by telemetry however by applying a default zero value to these vacant ICP estimations for an extended period of time without either addressing the communication issue or arranging for a disconnection means there is risk of consumption relating to these ICPs not being accounted for in the reconciliation process.</p> <p>The impact is assessed to be low due to the small number of affected ICPs.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We are investigating options to provide solutions for the above non-compliance. The reasons why vacant non-communicating meters were not resolved were due to access issues.	Ongoing	Investigating
reventative actions taken to ensure no further issues will occur	Completion date	
It would be difficult to eliminate the above issue but we will investigate options to put controls in place and provide best estimate where possible.	Ongoing	

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Nov-21 To: 21-Sep-22	Meter event logs not consistently reviewed, and no formal process is in place to ensure complete reviews are conducted. 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	Controls are rated as moderate as MEPs provide emails to Flick where action is required. The impact is assessed to be low, as most critical events are alerted by the MEPs via agreed SLAs between parties.	
Actions taken to resolve the issue	Completion date	Remedial action status
The above non-compliance occurred due to training issue. The operation agent has now been retrained and advised to ensure complete meter event log reviews are conducted.	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The above process is going to be assessed through monthly operations QA.	Ongoing	

Calculation of ICP days		
Non-compliance	Description	
Audit Ref: 11.2 With: Clause 15.6 From: 01-Nov-21 To: 21-Sep-22	ICP days are not provided for trading periods which do not have estimated or actual data, or where there was a ICP to NSP mapping issue. 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 are sufficient to ensure that most data is correctly reported unless actual or estimated data is unavailable. Estimates are created except where there is insufficient history for Telemetry to produce estimates. The impact is assessed to be low, as updated data will be provided through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
This non-compliance applies to the period between the last audit and when the new estimation process was implemented. Telemetry has now been enhanced to estimate data without a read history which enables ICP days to be included in reconciliation reports.	24/11/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
This non-compliance is now going to be eliminated with the enhancement of Telemetry which can now estimate data without a read history.	24/11/2022	

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: 01-Nov-21 To: 21-Sep-22	HHR estimates are not generated where there is insufficient history for Telemetry to generate an estimate. At least five ICPs did not have estimates generated because there was insufficient history for Telemetry to create an estimate. 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 Strong, estimates are now created after five days even if AMI data has not been received using either customer-initiated averages or a default daily average consumption, except where there is insufficient history for Telemetry to produce estimates. The impact is assessed to be low, as updated data will be provided through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
This non-compliance applies to the period between the last audit and when the new estimation process was implemented. Telemetry has now been enhanced to estimate data without a read history.	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This non-compliance is now going to be eliminated with the enhancement of Telemetry which can now estimate data without a read history.	24/11/2022	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 01-Nov-21 To: 21-Sep-22</p>	<p>Switch estimate reads provided by losing trader not used by Flick for two ICPs resulting in incorrect submission of 16 kWh.</p> <p>Backdated switch for ICP 0002401989EN1D8 (8 June 2019) resulted in 13,316 kWh not being included in the submission process.</p> <p>Actual HHR interval data automatically replaced with estimates where check sum validation identifies a difference of more than ± 1 kWh where the accuracy of the received midnight reads is not investigated prior to the data correction.</p> <p>Same reading not used by Flick for two ICPs resulting in 10 kWh under submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly.</p> <p>The impact is assessed to be medium, as actual interval data is being replaced with an estimate where inaccurate midnight reads are being used to estimate and replace actual interval values.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Retraining has been provided to the switch team on the RR process. An attempt will be made to correct the RR read.</p> <p>An escalation process has been implemented in the switching team for requests for all withdrawals exceeding the 14-month mark to be escalated to the Operations Manager.</p> <p>Withdrawals over the 14 months will not be initiated or accepted.</p>	24/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly Operations QA has been implemented to assess and monitor all the processes above.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.</p>	Ongoing	

Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7 With: Clause 15.12</p> <p>From: 01-Nov-21 To: 21-Sep-22</p>	<p>Switch estimate reads provided by losing trader not used by Flick for two ICPs resulting in incorrect submission of 16 kWh.</p> <p>HHR actual data replaced by inaccurate estimate where RR file rejected, and interval data is estimated and scaled to align with CS read estimate.</p> <p>Reasonable endeavours not met for ten active long term vacant and non-communicating AMI metered ICPs where zero value estimations are provided for more than 12 months.</p> <p>Backdated switch for ICP 0002401989EN1D8 (8 June 2019) resulted in 13,316 kWh not being included in the submission process.</p> <p>Actual HHR interval data automatically replaced with estimates where check sum validation identifies a difference of more than ± 1 kWh where the accuracy of the received midnight reads is not investigated prior to the data correction.</p> <p>Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>Controls are rated as moderate because they are sufficient to ensure that most information is recorded correctly.</p> <p>The impact is assessed to be medium due to the volume missing from the submission process and as some actual interval data is being replaced with an estimate where inaccurate midnight reads are being used to estimate and replace actual interval values.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Retraining has been provided to the switch team on the RR process. An attempt will be made to correct the RR read. The unvalidated HHR data is not replaced but marked as an estimated in the system. An attempt will be made to implement changes to the system, so it enables the unvalidated date to be marked as "unvalidated" rather than an estimate.</p> <p>We could not meet the HHY profile term for ICP 0002401989EN1D8 due to the switch being backdated. The backdated term had already passed the 16 weeks' timeframe. The ICP day non-compliance applies to the period between the last audit and when the new estimation process was implemented. Telemetry has now been enhanced to estimate data without a read history.</p> <p>ARC meters are currently in the process of being displaced so the issue of interval data being received to one decimal place will ultimately be eliminated. In the meantime, we will engage with AMS and explore any temporary solution to this.</p>	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monthly Operations QA has been implemented to assess and monitor the processes above.</p> <p>The Operations QA will be backed up by monthly compliance reporting and quarterly Operations internal audits.</p>	Ongoing	