

Compliance plan for Electric Kiwi - 2024

Non-compliance	Description		
Audit Ref: 2.1 With: clause 11.2 From: 01-Mar-23 To: 31-Mar-24	ELKI – Some inaccurate information are recorded in the registry 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 recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

Non-compliance	Description		
Audit Ref: 2.11 With: clause 10.33A From: 01-Mar-23 To: 31-Mar-24	ELKI - 14 reconnections were not certified within 5 business days. 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 recorded as moderate. There are processes in place that could be improved. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have an automated FlightPath report to check for expired meters and send automated messages to MEPs when found, to request they recertify. This was previously a manual process.		31 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Designing a FlightPath report to identify incoming customers with expired meters. This will be added into the automation process to communicate with MEPs.		2024	

Non-compliance	Description		
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 271 late updates to “Active” status • 102 late updates to “Inactive” status • 156 late trader updates Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as the process is partly manual therefore open to human error and mostly is done when automation for some reason does not work The audit risk rating is recorded as low as overall the level of compliance is high.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

Non-compliance	Description		
Audit Ref: 3.5 With: : 9 of Schedule 11.1 From: 01-Mar-23 To: 31-Mar-24	ELKI - 34 late updates to ANZIC code 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 recorded as strong. The updates were as follow up after the last audit to comply with clause 11.2. The audit risk rating is recorded as low as no impact on settlement outcome		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner. We note that some changes were identified in the prior audit and therefore changed within this audit period, a duplication not indicative of weakened controls.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.2</p> <p>With: clause 3 of Schedule 11.3</p> <p>From: 01-Mar-23</p> <p>To: 31-Mar-24</p>	<p>ELKI</p> <ul style="list-style-type: none"> • 33.9% of AN files contained incorrect reason code • 3 late AN files <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>Controls are recorded as moderate. The change to the AN codes expected to be made post the last audit has not progressed and the incorrect AA code has continued to be sent for 33.9 % switches with advanced metering present.</p> <p>The audit risk rating is assessed to be low as the registry details indicate to a gaining trader whether an ICP has an advanced meter or not. In most cases this information is not used by other traders because majority of installed meters are smart meters.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Training staff on manual processes to ensure we reduce lateness.</p>		<p>Ongoing</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Continued improvement and monitoring of controls including consistent training on manual processes.</p> <p>We do not believe the 'reason code' is a material test. The registry details indicate to a gaining trader the relevant information and as per the Auditor's comment, in most cases this information is not used by other traders.</p>		<p>Ongoing</p>	

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: clause 5 of Schedule 11.3</p> <p>From: 01-Mar-23</p> <p>To: 31-Mar-24</p>	<p>ELKI</p> <ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38. • 2 late CS files • 2 ICPs had incorrect Switch Event Meter Reading <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are recorded as moderate as the process is partly manual therefore open to human error</p> <p>The audit risk rating is recorded as low as overall the level of compliance is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Continued improvement and monitoring of controls including consistent training on manual processes.</p> <p>We note that the memo to auditors providing clarification on the calculation for average kWh/day states that the “Code requires participants to take all practicable steps to ensure that information they provide is accurate, which includes the average daily consumption”, which we are confident ELKI does. We would consider the calculation prescribed be taken as a minimum standard and where participants provide accurate information, a breach provides no effective value.</p>		Ongoing	

Non-compliance	Description		
Audit Ref: 4.4 With: clause 6(1) of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI - 1 late RR file Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. The system implemented by the company is automated. There is a small number (5) of RR files entered manually to the registry. Audit risk rating is recorded as low as no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: clause 10(1)of Schedule 11.3</p> <p>From: 01-Mar-23</p> <p>To: 31-Mar-24</p>	<p>ELKI</p> <ul style="list-style-type: none"> • 19.6% of AN files contained incorrect reason code • 4 AN files submitted late • 6 CS files submitted late • 3 E2 breaches • 5 T2 breaches • 2 ET breaches <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>The controls are rated as weak. The change to the AN codes expected to be made post the last audit has not progressed and the incorrect AA code has continued to be sent for 19.6% switches with advanced metering present. The audit risk rating is assessed to be low as the registry details indicate to a gaining trader whether an ICP has an advanced meter or not. In most cases this information is not used by other traders because majority of installed meters are smart meters.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As per 4.2</p> <p>Continued improvement and monitoring of controls including consistent training on manual processes.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: clause 11 of Schedule 11.3</p> <p>From: 01-Mar-23</p> <p>To: 31-Mar-24</p>	<p>ELKI</p> <ul style="list-style-type: none"> • Calculation of average kWh per day does not comply with Registry Functional Specification v22.38. • 3 ICPs had incorrect Switch Event Meter Reading or incorrect flag <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>Controls are recorded as moderate. There are processes in place that could be improved.</p> <p>The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Controls implemented since last audit have improved control risk rating.</p>			<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As per 4.3, we disagree with the calculation breach given that ELKI provides accurate information as is the Code requirement.</p> <p>Continued improvement and monitoring of controls including consistent training on manual processes.</p>		<p>Ongoing</p>	

Non-compliance	Description		
Audit Ref: 4.11 With: clause 12 of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI - 5 late RR files Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, process is well controlled, automated. Audit risk rating noted as low as no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

Non-compliance	Description		
Audit Ref: 4.15 With: clause 17&18 of Schedule 11.3 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 45 NA breaches • 10 SR 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 these are managed individually by an operator. The audit risk rating is assessed to be low as minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

Non-compliance	Description		
Audit Ref: 6.7 With: 6 of Schedule 15.2 From: 01-Mar-23 To: 31-Mar-24	ELKI – 4 CS files were sent with the Switch Event Meter Reading incorrectly labelled as E instead A Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong, process is well controlled. Audit risk rating noted as low as no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls implemented since last audit have improved control risk rating.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Mar-23 To: 31-Mar-24	ELKI <ul style="list-style-type: none"> • 13 ICPs submitted against incorrect NSP • Volumes not submitted for 9 ICPs Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as they are not working as expected and this is affecting submission accuracy. The audit risk rating has been assessed to be low as the issues identified were either corrected at the next revision or related to the incorrect NSP, but it is likely these were in the same balancing area, so this has no direct impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
ELKI will receive a daily EDA file from the registry and review any changes or updates from the previous version. All ICPs with changes will undergo an ICP sync process within Bikkie. However, if an ICP is altered in the registry before becoming an active ICP in Bikkie, the ICP sync will not occur. This issue affects ICPs in Bikkie that are not yet active, which can happen during the switching process. When an ICP is updated in the registry but not yet active in Bikkie, the automated sync does not take place. To address this, Bikkie is programmed to perform an ICP sync on the day EK receives the Switch CS file from the losing retailer. Occasionally, the automation may miss some active ICPs. These missed ICPs are identified when the switching team reviews GR-090 alongside LIS files.		Jan 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continued improvement and monitoring of controls including consistent training on manual processes.		Ongoing	

Non-compliance	Description		
Audit Ref: 12.2 With: 15.4 From: 01-May-23 To: 05-May-23	ELKI Self-breach 2305ELKI1- submission files late by 1 hour Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. It was self-reported, it was caused by problem with IT system. The audit risk rating has been assessed to be low as the issues identified had no impact on settlement outcomes		
Actions taken to resolve the issue		Completion date	Remedial action status
Issue with system resolved and we create reports earlier to ensure resolution within timeframes.		May 2023	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Controls implemented since last audit have improved control risk rating. We will continue to ensure our current strong processes and controls are executed in an accurate and timely manner.		Ongoing	

Non-compliance	Description		
Audit Ref: 12.3 With: 15.5 From: 01-Mar-23 To: 31-Mar-24	ELKI 13 ICPs submitted against incorrect NSP Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as they are not working as expected and this is affecting submission accuracy. It has been identified in previous audits. The audit risk rating has been assessed to be low as the issues identified were either corrected at the next revision or related to the incorrect NSP, but it is likely these were in the same balancing area, so this has no direct impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per 11.4			

Non-compliance	Description		
<p>Audit Ref: 12.7</p> <p>With: clause 15.12</p> <p>From: 01-Mar-23</p> <p>To: 31-Mar-24</p>	<p>ELKI</p> <ul style="list-style-type: none"> Alleged breach 2403ELKI1– inaccurate data 13 ICPs volumes allocated to incorrect NSP <p>EKCI</p> <ul style="list-style-type: none"> Alleged breach 2311ELKI1– inaccurate data <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls are recorded as weak. Twice inaccurate data was provided to RM. The current process to monitor NSP changes does not mitigate risk effectively.</p> <p>Audit risk rating was assign as low because RM submission were promptly corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>EKCI – compare high level month to month data to check anomalies.</p>		<p>Nov 23</p>	<p>Identified</p>
<p>ELKI – automated sync process in place and monthly check between NSPs for regular monitoring.</p>		<p>March 24</p>	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Continued improvement and monitoring of controls including consistent training on manual processes.</p> <p>We note the technical breach due to ARC meters and highlight the Auditor’s comment that “ELKI does not have any influence on timing when these meters are replaced”. This is an ineffective audit test.</p> <p>Incorrect NSP’s are as per 11.4.</p>		<p>Ongoing</p>	

Non-compliance	Description		
Audit Ref: 13.1 With: 8 of Schedule 15.3 From: 01-Mar-23 To: 31-Mar-24	ELKI - 13 ICPs submitted against incorrect NSP Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak. The current process to monitor NSP changes does not mitigate risk effectively. The audit risk rating has been assessed to be low as the issues identified were either corrected at the next revision or related to the incorrect NSP, but it is likely these were in the same balancing area, so this has no direct impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As per 11.4			