

Compliance plan for Nova Energy Limited 2024

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 10.6, 11.2, 15.2</p> <p>From: 01-Apr-23 To: 31-May-24</p>	<p>TODD Some inaccurate data was not corrected as soon as practicable.</p> <p>HNET Some inaccurate data was not corrected as soon as practicable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is some room for improvement.</p> <p>The audit risk rating is low as the overall volume of ICPs affected is low. Where statuses are incorrect, the reconciliation process ensures that all consumption is reported. Status inaccuracies can have a minor impact on ICP days submissions.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted.</p> <p>TODD acknowledges some updates were not made within the required timeframes. Data integrity reporting is now being actively worked but this historically been an issue due to resource constraints internally.</p> <ul style="list-style-type: none"> • Profile discrepancies on day of meter change – see section 6.1 • Volume corrections for ICPs with defective or bridged meters – see section 2.17 • Two unmetered load corrections applied without virtual boundary reads – see section 3.3 • TODD is unable to gain more accurate information for ARC Meter consumption, but this will be resolved by the removal of ARC Metering. <p>HNET:</p>	Ongoing	Identified

<p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> • 0000546124NR68F – MEP originally recorded incorrectly, now corrected. • 0414128044LC7CD – updated event date did not match the CS event date. Customer confirmed late that solar system is not being used. • 1000549774PC17C - See section 12.13 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>As above this continues to be an area of focus for TODD.</p> <p>HNET:</p> <p>HNET will improve the steps for handling profile changes in the automation process. The automation will notify both the customer service team and the switching team about potential profile changes to verify whether the customer is using a solar panel. Profile changes will be carried out manually.</p>	<p>Ongoing</p> <p>Q1 2024</p>	

Electrical Connection of Point of Connection	
Non-compliance	Description
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 14-Mar-23</p> <p>To: 08-Mar-24</p>	<p>TODD</p> <p>55 ICPs did not have full certification within five business days of reconnection.</p> <p>WISE</p> <p>Three ICPs did not have full certification within five business days of reconnection.</p> <p>HNET</p> <p>Six ICPs did not have full certification within five business days of reconnection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are strong, reporting is in place to identify meters which have been initially electrically connected or reconnected without full meter certification and advise the MEP.</p> <p>The audit risk rating is low as a small proportion of ICPs were affected. Uncertified meters may have unidentified accuracy issues, but other validation processes will help to identify these.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted. 0234172045LCFD4 has now been corrected on the registry.</p> <p>55 ICPs late or no current certification</p> <ul style="list-style-type: none"> TODD continues to work with MEPs on deployment program(s), BAU field jobs, turn downs due to additional electrical work required and consumer contact challenges. Current development work to identify uncertified ICPs at time of sign up, particularly when a reconnection is requested, is in progress to improve immediate identification of sites and raise work to be corrected. <p>WISE: Non-Compliance accepted.</p> <ul style="list-style-type: none"> Three ICPs have since been recertified. <p>HNET: Non-Compliance accepted.</p> <ul style="list-style-type: none"> Three ICPs have since been recertified. Three ICPs still have work being undertaken to resolve. HNET continues to work with customers and external partners to resolve as quickly as possible. 	<p>Ongoing</p> <p>June 2024</p> <p>Ongoing</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD: As above.</p> <p>WISE: WISE will strengthen controls by extending the monitoring of meter certification expiration from the existing 7 days prior to 30 days prior to prevent reconnections from occurring after meter certifications have expired.</p> <p>HNET: HNET will continue to work with MEPs to meet the code timeframes.</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-Mar-23</p> <p>To: 31-May-24</p>	<p>TODD</p> <p>Two ICPs have had their meters unbridged but corrections are still to be peer reviewed before being added in Orion. The meters were unbridged between 26 June 2023 and 27 July 2024.</p> <p>Four ICPs switched out before bridged meter corrections were processed.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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. TODD has improved their processes to identify bridged meters and intends to develop a process to estimate consumption for ICPs which switch out while bridged, or before a correction is able to be processed.</p> <p>The audit impact is low based on the kWh impact. Corrections are in progress for two ICPs and revised submission data will be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>Two ICPs have now had the corrections processed and consumption will be washed up.</p>	June 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>TODD has improved processes and therefore compliance outcomes in this area over the last 12 months, with further improvements in development.</p>	Q4 2024	

Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 3.3</p> <p>With: 10 Schedule 11.1</p>	<p>TODD</p> <p>208 late updates to “active” status for reconnections.</p> <p>94 late status updates to “inactive” status.</p> <p>495 late trader updates.</p>

<p>From: 16-Aug-23 To: 14-Mar-24</p>	<p>314 ANZSIC code updates were made more than 20 business days after the ICP start date.</p> <p>WISE</p> <p>16 late updates to “active” status for reconnections.</p> <p>Ten late status updates to “inactive” status.</p> <p>Eight late trader updates.</p> <p>Three ANZSIC code updates were made more than 20 business days after the ICP start date.</p> <p>HNET</p> <p>Eight late updates to “active” status for reconnections.</p> <p>12 late status updates to “inactive” status.</p> <p>44 late trader updates.</p> <p>Six ANZSIC code updates were made more than 20 business days after the ICP start date.</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 for the timeliness and accuracy of status and trader updates are moderate. The majority of updates were on time but there is some room for improvement, particularly when selecting event dates for trader updates.</p> <p>The audit risk rating is low this as the impact on submission accuracy is minor, and the late updates had no impact on submission or were made in time for revised submission information to be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>314 late ANZSIC updates were made up of backdated switch, late corrections due to customer contact and some updates made late due to human error. TODD has halved the non-compliances in this area from last audit period and continues to make this a focus.</p> <p>See sections 3.5 and 3.8. In all instances exception reporting identified the errors.</p> <p>WISE:</p> <p>Non-Compliance accepted.</p>	<p>Ongoing</p>	<p>Identified</p>

<ul style="list-style-type: none"> • 16 late "active" statuses were due to incorrect information from the MEP, customer meter tampering, or backdated switching. • 10 late "inactive" statuses occurred during the process of correcting the Registry's status or were reported late due to meter damage from fire. • All of the late updates were MEP nominations processed 7 - 15 business days after the event date because notification of the MEP change and/or correct MEP was received late. • All ANZSIC Code updates were a result of backdated switch ins and therefore updated as soon as practicable. <p>HNET:</p> <p>Non-Compliance accepted.</p> <p>Some registry information was not updated on correct date of the event.</p> <ul style="list-style-type: none"> • Incorrect event date update regarding ANZSIC code were caused by human error. • Correction has been done after switching in for late reconnection status. 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>TODD is currently developing improvements to the sign-up process to capture more accurate ANZSIC codes from the sign-up process.</p> <p>TODD has redistributed internal workflows to improve resource availability to this area.</p> <p>WISE:</p> <p>WISE has a high level of automation for updating the Registry, and most delayed updates were result of rare events that require further investigation. Focus continues to be providing full and accurate information of event dates.</p> <p>HNET:</p> <p>HNET will continue with on-going refresher training, review processes and where possible identify improvement on accuracy of event dates and complete accurate information. However, realistically, late status updates are impossible to be not found due to current HNET business logic.</p>	<p>Q4 2024</p> <p>Ongoing</p> <p>Ongoing</p>	

Provision of information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.5 With: 9 of schedule 11.1 From: 14-Apr-23 To: 06-Mar-24	TODD 163 late updates to “active” status for new connections. Seven late updates to “inactive - new connection in progress” status and late MEP nominations for new connections. Two of a sample of 25 new connections with date discrepancies had an incorrect “active” date and were corrected during the audit. 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 moderate because around 2/3 of updates were on time, and improvements to validation processes are likely to improve submission accuracy. The impact is low because the late updates were processed in time for revised submission information to be provided through the revision process, and all errors were corrected during the audit.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD: Non-Compliance accepted. <ul style="list-style-type: none"> As reflected in last year’s audit, TODD completing compliant registry updates is impacted by MEPs providing accurate paperwork outside of retailer timeframes. This is compounded by EA rules requiring retailers to update ICP within 5 days, while allowing MEPs 10 days. TODD has developed an improved method to track paperwork delays and reasons, to support closer management of MEP and contractor delivery. Dedicated resource to the processing of new connection paperwork was implemented in February 2023. 	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: TODD will continue to identify, develop, and implement processes to improve timely and accurate registry updates, and	Ongoing	

to work with our industry stakeholders to reduce the instances of late paperwork		
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ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: 9 (1(k) Schedule 11.1 From: 09-Nov-20 To: 13-May-24	TODD One of a sample of 100 ICPs had an incorrect ANZSIC code applied and was corrected during the audit. HNET One of a sample of 50 ICPs had an incorrect ANZSIC code applied and was corrected during the audit. Potential impact: None Actual impact: None Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are strong. There is good validation and a very small number of exceptions were identified. Incorrect ANZSIC codes have no direct impact on reconciliation therefore the audit risk rating is low. There is an impact on reporting by the Electricity Authority.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD: Non-Compliance accepted. One ICP was identified and corrected in the audit period. The ICP was under the companies ANZSIC code rather than reflecting what the site is used for. HNET: Non-Compliance accepted. One incorrect ICP identified and corrected within the audit period	May 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: TODD has several exception reports to ensure the correct ANZSIC codes are assigned upon switch in and captures existing sites where new customers take over. TODD has seen	Ongoing	

<p>continuous improvement in compliance in this area and are working on further improvements in the sign-up process to gain the correct ANZSIC code for the site, rather than the consumer.</p> <p>HNET:</p> <p>HNET will implement an additional check when updating ANZSIC codes by validating the business name using the company register and monitoring if the registered address and business address is identical.</p>		
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Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: 9(1)(f) of Schedule 11.1</p> <p>From: 21-Jul-21</p> <p>To: 25-Mar-24</p>	<p>TODD</p> <p>Four of the 228 ICPs with unmetered load had incorrect daily unmetered kWh recorded and were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice 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. For three of the four errors confusion had arisen because of the way the network had recorded the shared unmetered load against the child ICPs.</p> <p>The impact is low because the differences were small and the data has been corrected so that revised submission information can be provided.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>All incorrect ICPs were corrected during the audit session.</p>	June 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>During staff transition the daily monitoring of the exception reporting identifying inconsistencies was not reassigned. This has now had resource allocated and is being managed daily.</p>	June 2024	

Management of "active" status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: 17 Schedule 11.1</p> <p>From: 26-Oct-23</p> <p>To: 09-Feb-24</p>	<p>TODD</p> <p>ICP 1001155450CK45C is believed to have been reconnected by the gaining trader, but its status was not updated to "active" prior to switch out.</p> <p>Two of a sample of 25 new connections with date discrepancies had an incorrect "active" date and were corrected during the audit.</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 strong because a very small number of "active" status date discrepancies were identified, and good validation processes are in place for all codes. TODD is planning to improve and refine its validation processes.</p> <p>The audit risk rating is low. There were all small number of discrepancies and the ICPs have been corrected or switched out.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>ICP 1001155450CK45C was not reconnected by TODD, reads were being obtained in late September but not processed in time to have the status corrected ahead of the site switching out on 1 October.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>TODD has seen improved compliance in this area in the last 12 months. This is a continued area of focus and additional resourcing has been assigned to the exception reports that identify discrepancies.</p>	Ongoing	
Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
Audit Ref: 4.2	TODD	

<p>With: 3 and 4 Schedule 11.3</p> <p>From: 31-Aug-23</p> <p>To: 02-Nov-23</p>	<p>Four ANs had the AA response code applied because they were vacant, but the AD code should have applied because they had AMI metering. A bug in the report logic resulted in the incorrect code being applied.</p> <p>ICP 0273157280LC292 AN-8232575 28 February 2024 had the PD code applied when it was not disconnected due to a discrepancy between the Orion and registry status.</p> <p>WISE</p> <p>One AN file had an incorrect response code manually selected.</p> <p>HNET</p> <p>One AN file had an incorrect response code applied.</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	
<p>Low</p>	<p>The controls are moderate overall. Most files have the correct codes applied but under some circumstances incorrect codes are selected manually or by the systems due to a bug or ICPs having their attributes changed around the time of AN generation.</p> <p>The impact is assessed as low as because the late files were issued in time for revised submission data to be provided through the revision process. The incorrect response codes may have a minor impact on the other party.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>TODD has hierarchy logic built into our Billing platform to support generate the AN code.</p> <ul style="list-style-type: none"> • Current logic uses the site reader route code to determine if AA or AD should be used which has resulted in some inaccurate AN codes. • One instance of a PD being sent due to a timing issue following the reconnection of a site being processed on the Registry but not in the Billing platform at time of AN creation. <p>WISE:</p> <p>Non-Compliance accepted.</p> <p>One AA response code was incorrectly sent during new staff training sessions.</p> <p>HNET:</p>	<p>Ongoing</p>	<p>Identified</p>

<p>Non-Compliance accepted.</p> <p>One AA response code sent incorrectly due to a system issue. All AN response codes are applied by hierarchy logic which failed in this isolated incident.</p>		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD:</p> <p>TODD is investigating enhancement of the AN logic to ensure the AA or AD decision is as accurate as possible.</p> <p>WISE:</p> <p>Refresher training will be provided to all staff on the conditions under which each AN code should be applied.</p> <p>HNET:</p> <p>The AN response code hierarchy logic has been reviewed and confirmed to be correct, no further instances of errors have been identified.</p>	<p>Ongoing</p>	

Losing trader must provide final information - standard switch	
Non-compliance	Description
<p>Audit Ref: 4.3</p> <p>With: 5 Schedule 11.3</p> <p>From: 22-Jun-23</p> <p>To: 08-Mar-24</p>	<p>TODD</p> <p>0007180217RNFF4 CS-4835341 26 June 2023 had an incorrect average daily consumption recorded.</p> <p>WISE</p> <p>15 CS breaches.</p> <p>ICP 0497540274LCB49 CS-4834715 22 June 2023 had an incorrect last actual read date.</p> <p>HNET</p> <p>Average daily consumption was incorrect for 1000616455PC5CF CS-5364430 17 December 2023.</p> <p>ICP 0006110590WM304 CS-5354112 7 December 2023 had an incorrect last actual read 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	The controls are strong overall. A relatively small proportion of files contained incorrect content. The audit risk rating is assessed to be low overall based on the proportion of files with incorrect information, and that no reading information was incorrect.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted. ICP 0007180217RNFF4 had incorrect consumption recorded in the CS file due to an isolated system issue. This is currently being investigated.</p> <p>WISE: Non-Compliance accepted.</p> <ul style="list-style-type: none"> • 15 ICPs had late CS files due to human error in taking the AN date instead of NT date. This has been addressed through refresher training. • ICP 0497540274LCB49 had an incorrect read manually entered. <p>HNET: Non-Compliance accepted.</p> <ul style="list-style-type: none"> • 1000616455PC5CF is a new ICP and switched out within a month so gaining two actual reads was not possible. • 0006110590WM304 recorded an incorrect last actual read date. 	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD: As above</p> <p>WISE: WISE is providing ongoing refresher training to staff to reduce risk of recurrence.</p> <p>HNET: Following the auditor's recommendation, HNET is investigating solutions for in creating estimated consumption for sites where two actual reads are not able to be gained</p>	Ongoing	

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>From: 03-Apr-23</p> <p>To: 01-Dec-232</p>	<p>TODD</p> <p>13 ANs had the AA response code applied because they were vacant, but the AD code should have applied because they had AMI metering.</p> <p>Four ANs had the AA response code applied but should have had PD because they were disconnected.</p> <p>Ten ANs had the AD response code applied when the AMI flag was set to no.</p> <p>One E2 breach.</p> <p>WISE</p> <p>Two E2 breaches.</p> <p>One WR breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are moderate overall. Most files have the correct codes applied but under some circumstances incorrect codes are selected by Orion due to a bug or a discrepancy between Orion and the registry.</p> <p>The impact is assessed as low as because the late files were issued in time for revised submission data to be provided through the revision process. The incorrect response codes may have a minor impact on the other party.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> • 13 ANs had the AA response code applied – see section 4.2 • Four ANs had the AA response code applied but should have had PD – see section 4.2 same timing issue. • Ten ANs had the AD response code applied when the AMI flag was set to no. – see section 4.2 same logic issue in the AN hierarchy. • One E2 breach – Human error. NWDF should have been triggered instead of changing the effective date in the AN. <p>WISE:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> • Two E2 breaches due to human error when training new staff. 	<p>Ongoing</p>	<p>Identified</p>

<ul style="list-style-type: none"> One WR breach due to human error due to a high volume of switch requests. 		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>For the AA, AD and PD issues see section 4.2.</p> <p>E2 breach has not recurred since the completion of training of new staff. Refresher training will continue to be provided to all staff responsible for this process.</p> <p>WISE:</p> <p>Refresher training will continue to be provided to all staff responsible for the processes.</p>	Ongoing	

Losing trader must provide final information - switch move	
Non-compliance	Description
<p>Audit Ref: 4.10</p> <p>With: 11 Schedule 11.3</p>	<p>TODD</p> <p>0000103127TRB29 CS-4939305 2 June 2023 had an incorrect average daily kWh applied.</p> <p>44 CS files had an event date before the last actual read date, because reads after the event date were not made misreads.</p> <p>ICP 0000000443CP811 CS-5455330 12 February 2024 should have had an actual read type but the reading was mislabeled when it was moved to an occupier account.</p> <p>ICP 0000001515UNDA1 CS-4813830 6 June 2023 should have switched out on 42214/27150 A which are the reads for 5 June 2023 but switched out on 42215/27152 A which are the reads for 6 June 2023.</p> <p>ICP 0000037455CP67F CS-5161256 16 October 2023 should have switched out with an estimated read type but actual was applied, and the last actual read date was incorrect.</p> <p>ICP 0000500900CAE05 CS-5441096 12 February 2024 should have switched out with an estimated read type but actual was applied, and the last actual read date was incorrect.</p> <p>ICP 0900086046PCFFD CS-4908312 7 August 2023 had an actual read type applied but should have been estimated, and the average daily kWh was incorrect.</p> <p>ICPs 0000538407NR066 CS-5368107 7 December 2023 and 0000007850UN283 CS-5454042 1 March 2024 had incorrect last actual read dates applied. For ICP 0000538407NR066 the average daily kWh was also incorrect.</p> <p>WISE</p> <p>Four CS files contained incorrect average daily kWh and readings, because the closing readings were entered incorrectly for some meter registers. The readings were corrected through the RR process, or the switches were withdrawn.</p>

<p>From: 02-Apr-23 To: 12-Feb-24</p>	<p>HNET</p> <p>ICP 0000543613TU8C0 CS-4732186 5 April 2023 had an incorrect last actual read date and average daily kWh because reads after disconnection were not loaded against the 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	
<p>Low</p>	<p>The controls are moderate overall. A relatively small proportion of files contained incorrect content. Most of the errors for TODD related to ICPs which were moved to occupier accounts on the day that the switch was completed, causing data discrepancies.</p> <p>The audit risk rating is assessed to be low overall based on the proportion of files with incorrect information, and the kWh differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> 44 ICPs had inaccurate last read dates applied due to timing issues where the import of meter reads was the same day as the CS creation file, therefore the reads were not updated. ICP 0000001515UNDA1 - see section 4.16. Five other ICPs were sent without correct read information due to sites being moved accounts mid switch process. TODD is currently reviewing options to address this issue <p>WISE:</p> <p>Non-Compliance accepted.</p> <p>WISE daily average consumption is calculated by the system based on the two most recent actual reads; the four instances of incorrect daily average consumption occurred due to an error when updating the final reading values for disconnected meters. These have all been corrected through RR and NW.</p> <p>HNET:</p> <p>Non-Compliance accepted.</p> <p>Current system logic for CS generation uses disconnection reads as estimates instead of the last actual read.</p>		<p>Investigating</p>

Preventative actions taken to ensure no further issues will occur	Completion date
<p>TODD: TODD is investigating solutions to address the inaccuracy of read information provided in the CS files due to timing issues of account changes and read importation.</p> <p>WISE: WISE will automate the process of entering final reading values for disconnected meters to minimise errors.</p> <p>HNET: HNET will improve the system logic for the creation of CS files so the last actual read is used instead of the disconnection read.</p>	<p>Ongoing</p> <p>July 2024</p> <p>Q1 2025</p>

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.11 With: 12 Schedule 11.3</p> <p>From: 22-Sep-23 To: 20-Feb-24</p>	<p>TODD 11 RR breaches.</p> <p>HNET One RR breach. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls over the read renegotiation process are strong. A small number of RR breaches occurred because of delays in obtaining the two actual reads required to issue an RR.</p> <p>The audit risk rating is low. The late RR files are expected to improve data accuracy, and revised reconciliation data is washed up once the RR process is completed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted.</p> <p>TODD maintains following best practices and only sends files outside of timeframe when required to correct invoicing for customers.</p>	Ongoing	Identified

<p>HNET:</p> <p>Non-Compliance accepted.</p> <p>The one late RR was a result of a communication error with the meter, meaning the two validated reads required for the RR process could only be attained outside of the required timeframe.</p>		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD:</p> <p>TODD only sends RRs outside of timeframes when in the best interest of the customer. TODD continues with refresher training, process reviews and improvement implementation where possible</p> <p>HNET:</p> <p>HNET will continue with ongoing monthly review for potential RR cases and identify possible improvement opportunities. HNET endeavours to obtain actual readings by using all available methods within the required timeframes.</p>	<p>Ongoing</p>	

Gaining trader to advise the registry manager - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.14</p> <p>With: 16 Schedule 11.3</p> <p>From: 21-Sep-23</p> <p>To: 21-Sep-23</p>	<p>HNET</p> <p>One HH CS breach.</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	
<p>Low</p>	<p>The controls are strong because the process has now been confirmed and future files are expected to be issued on time. The impact is low because the file was 11 days overdue.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

HNET: Non-Compliance accepted. One CS File was sent late as this scenario is not common for HNET. This non-compliance has increased awareness of requirements for the relevant staff members.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
HNET: Refresher training is being provided to staff responsible for the HH switching process.	Ongoing	

Withdrawal of switch requests	
Non-compliance	Description
Audit Ref: 4.15 With: 17 and 18 Schedule 11.3 From: 17-Apr-23 To: 19-Feb-24	TODD Three NW files had the date failed code applied where the proposed event date was not more than ten business days in the future. 11 SR breaches. 55 NA breaches. WISE Three NW files had the date failed code applied where the proposed event date was not more than ten business days in the future. Three NW files were created in error and rejected by the other trader at WISE's request. One NA breach. One SR breach. HNET Three NW files had the date failed code applied where the proposed event date was not more than ten business days in the future. Six NA breaches. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

<p>Low</p>	<p>The controls are moderate. All DF coded withdrawals checked had incorrect advisory codes applied and processes need to be updated to ensure this code is used correctly. Most NW files were issued on time and most delays were due to circumstances not fully within Nova’s full control such as late notification from the customer, and negotiation with the other trader.</p> <p>The audit risk rating is low. Withdrawals were completed in time for revised data to be provided through the revision process. The impact of incorrect NW codes is reduced by supporting correspondence being provided to the other trader to explain the reasons for the withdrawal request.</p>		
<p>Actions taken to resolve the issue</p>		<p>Completion date</p>	<p>Remedial action status</p>
<p>TODD:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> • Three ICPs had an incorrect withdrawal code of DF applied. As the NW was valid, just the incorrect code and all were historic switches, no action has been taken to correct. • SR breaches were a result of delays while unauthorised switches and wrong property issues were investigated. • NA breaches were caused by late advice from the customer, investigation to determine the correct property, and delays while metering issues were resolved. <p>WISE & HNET:</p> <p>Non-Compliance accepted.</p> <p>During the audit it was identified that WISE had an incorrect interpretation of when to apply the DF code. Training on this correction has been provided to staff.</p>		<p>Ongoing</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>		<p>Completion date</p>	
<p>TODD:</p> <ul style="list-style-type: none"> • The NW code issue was a result of onboarding new staff members. All occurred within a short time period and have not reoccurred since the completion of training. • TODD considers it is in the best interest of the customer to correct data to invoice accurately and that we comply with Clause 11.2 of part 11 “to provide complete and accurate information”. TODD recognises this may cause some low impact non-compliances. <p>WISE & HNET:</p> <p>WISE & HNET will provide ongoing staff training.</p>		<p>Ongoing</p>	

Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: 21 Schedule 11.3</p> <p>From: 02-Apr-23</p> <p>To: 07-Nov-23</p>	<p>TODD</p> <p>ICP 0000001515UNDA1 CS-4813830 6 June 2023 should have switched out on actual reads 42214/27150 which are the reads for 5 June 2023 but switched out on actual reads 42215/27152 which are the reads for 6 June 2023. The impact is 3 kWh.</p> <p>WISE</p> <p>Four CS files contained incorrect readings, because the closing readings were entered incorrectly for some meter registers. The readings were corrected through the RR process, or the switches were withdrawn.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong, these were isolated errors. The impact is low because the WISE reads were corrected through the RR process or the switches were withdrawn, and the TODD ICP had a 3 kWh difference.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>TODD has not corrected the reads due to the length of time that has passed since the ICP switch event, and the gaining retailer did not initiate the RR Process.</p> <p>WISE:</p> <p>Non-Compliance accepted.</p> <p>The four instances of incorrect readings occurred due to an error when updating the final reading values for disconnected meters. All have been corrected through RR and NW.</p>	June 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>TODD:</p> <p>TODD will provide refresher training to staff as the reads were not managed correctly. This is addressed in the recommendation in 4.10.</p> <p>WISE:</p> <p>WISE will automate the process of entering final reading values for disconnected meters to minimize errors.</p>	<p>July 2024</p>	
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Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: 11.14</p> <p>From: 21-Jul-21</p> <p>To: 25-Mar-24</p>	<p>TODD</p> <p>Three of the 68 ICPs with shared unmetered load had incorrect daily unmetered kWh recorded and were corrected during the audit.</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	
<p>Low</p>	<p>The controls are strong. Confusion had arisen because of the way the network had recorded the shared unmetered load against the child ICPs.</p> <p>The impact is low because the differences were small and the data has been corrected so that revised submission information can be provided.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>The three impacted ICPs were corrected during the audit sessions.</p>	<p>June 2024</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>Due to staff turnover, the allocation of the data integrity management had not been allocated to a new staff member. This has now been rectified and will be managed daily.</p>	<p>June 2024</p>	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: 10.13 From: 27-Nov-23 To: 31-May-24	<p>TODD ICPs 0000931804TU29B, 0000542172TU5D7 and 1001266765UN6ED remain on RPS only but should have RPS PV1 profile. Ten ICPs had jobs for I flow meter installation turned down and are under investigation to determine whether generation should be gifted or are being queried with the network. While meters were bridged, energy was not metered and quantified according to the code for 25 ICPs.</p> <p>WISE While meters were bridged, energy was not metered and quantified according to the code for nine ICPs.</p> <p>HNET ICP 1002063645LCC9B was confirmed to have solar generation in use, but no I flow metering has been requested and no notification of gifting has been provided to the reconciliation manager. While meters were bridged, energy was not metered and quantified according to the code for two ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. There are good processes in place to ensure that energy is quantified, but there are sometimes delays in investigating and metering distributed generation consumption. A small amount of under submission of I flow volumes will be occurring. There are processes in place to estimate consumption for bridged meters.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted.</p> <ul style="list-style-type: none"> ICPs 0000931804TU29B, 0000542172TU5D7 and 1001266765UN6ED have had their profiles corrected on the Registry. Ten ICPs are still under investigation as per the recommendation TODD has accepted. The process for correcting the consumption for bridged meters once fixed has been strengthened. <p>WISE:</p>	Ongoing	Identified

<p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> The existence of bridged meters where energy was not metered or quantified during bridge period is acknowledged. <p>HNET:</p> <p>Non-Compliance accepted.</p> <ul style="list-style-type: none"> ICP 1002063645LCC9B HNET informed NZX reconciliation manager. NZX Reconciliation Manager confirmed the ICP has been added to the gifted generation register. 		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD:</p> <ul style="list-style-type: none"> Additional training will be provided to the staff who manage the data integrity reports with more resource allocated to action these areas. A process will be established for staff to follow for adding sites to the gifting register where required. <p>WISE:</p> <p>WISE continues to work with MEPs through service level agreements and on-going regular operational meetings to ensure bridging of meters continues to be an undesirable outcome.</p> <p>HNET:</p> <p>HNET has accepted both of the auditors' recommendations and will utilise the gifted generation register if there a future instances where the conditions are met.</p> <p>HNET will continue to make best endeavours to resolve issues in a timely and accurate manner working with our industry stakeholders.</p>	<p>Ongoing</p>	

<p>Derivation of meter readings</p>	
<p>Non-compliance</p>	<p>Description</p>

Audit Ref: 6.6 With: 5 Schedule 15.2 From: 1-Apr-23 To: 31-May-24	TODD Wells meter condition events are not currently reviewed. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are weak, because Wells meter condition events are not reviewed by TODD. There are other processes in place to identify meter condition issues and MRS events are reviewed. TODD is investigating how to best obtain and review Wells meter condition information. The impact is low, because Wells advised there were no recent meter condition events for TODD ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD: Non-Compliance accepted. TODD is engaging with Wells to reestablish the delivery of the meter condition reports so appropriate actions can be taken to resolve issues.		Q3 2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD: As above		Q3 2024	

Derivation of meter readings	
Non-compliance	Description
Audit Ref: 6.7 With: 6 Schedule 15.2	TODD ICP 0000001515UNDA1 CS-4813830 6 June 2023 should have switched out on actual reads 42214/27150 which are the reads for 5 June 2023 but switched out on actual reads 42215/27152 which are the reads for 6 June 2023. The impact is 3 kWh. Profile changes for ICPs 0000052655HB79C and 0000831042HBD34 were processed incorrectly resulting in HHR consumption on the day of the meter change being omitted from submission. WISE Four CS files contained incorrect readings, because the same final readings were entered into PEBS against two channels. The readings were corrected through the RR process, or the switches were withdrawn.

From: 20-Apr-23 To: 7-Nov-23	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 moderate. A relatively small proportion of switching files contained incorrect content, and the reconciliation team is now responsible for profile changes to ensure that they are processed accurately. The audit risk rating is assessed to be low overall based on the proportion of files with incorrect information, and the kWh differences identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD: Non-Compliance accepted. <ul style="list-style-type: none"> ICP 0000001515UNDA1 see section 4.16 Profile changes see section 6.1 WISE: Non-Compliance accepted. See section 4.10		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD & WISE: As above		Ongoing	

Trading period duration	
Non-compliance	Description
Audit Ref: 7.1 With: 13 Schedule 15.2 From: 01-Sep-23 To: 31-Dec-23	TODD EDMI recorded a time difference of 61-62 seconds for category 2 ICP 1000600536PC2DA from September 2023 which was resolved by January 2024. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	There are strong controls because the issue was identified and resolved. The impact is low because trading period duration had a of 51-52 seconds more than the allowable difference.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD: Non-Compliance accepted. Issue was identified and actioned accordingly.		June 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TODD: TODD will continue to monitor issues to ensure submissions are accurate.		June 2024	

Identification of readings			
Non-compliance	Description		
Audit Ref: 9.1 With: 3(3) Schedule 15.2 From: 07-Aug-23 To: 12-Feb-24	TODD Four switch move CS files had incorrectly recorded switch event read types. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are strong because most reads types are correctly recorded. The issues only affected the CS file content, and occurred where an occupier account was created on the day of the switch or reads after the switch event date were not made misreads. The impact on settlement and participants is low, because the read values were correct. All switch event reads are treated as validated and permanent by the reconciliation process and are used to calculate historic estimate.		
Actions taken to resolve the issue		Completion date	Remedial action status
TODD: Non-Compliance accepted. See section 4.10		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

TODD: As above	Ongoing	
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Meter data used to derive volume information		
Non-compliance	Description	
Audit Ref: 9.3 With: 3(5) Schedule 15.2 From: 1-Jun-20 To: 31-May-24	<p>TODD AMI data AMI readings with decimal places are rounded to zero decimal places on import into Orion, and the rounded readings are used to calculate submission data.</p> <p>HNET AMI data AMI readings with decimal places are rounded to two decimal places on import into IPBMS, and the rounded readings are used to calculate submission data.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate because they are not sufficient to ensure that submission information is consistently calculated from unrounded data. WISE data is not rounded.</p> <p>The impact is assessed to be low because the ICP level differences are expected to be very small, and the overall differences are expected to be small because there will be under and overs due to the rounding technique.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance disputed. Issue still exists since last audit. Compliance with this interpretation of this clause would cause non-compliance with Schedule 11.3 clause 5 & 11 and clause 6 (Traders must use same reading) and lead to overall volume inaccuracy in customer bills and submission, whereas using Odp rounded reads does not introduce this overall volume inaccuracy into the switching process. The registry switching process would need to also accept switch reads containing decimal places in order to not over/under bill customers and over/under report volumes on each switch.</p> <p>HNET: Non-Compliance accepted.</p>	Ongoing	<p>TODD: disputed The auditor agrees that this is a technical non-compliance, and resolving it could create discrepancies and inaccuracies for switching and billing. The impact is very low.</p> <p>HNET: identified</p>

HNET will implement system changes by Q1 2025 to rectify the cause of the non-compliance.		
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: As above HNET: HNET acknowledges the problem of AMI readings rounded up to calculate submission data. The system will be updated to ensure all decimal places are included in the calculation of AMI readings.	Q1 2025	

Half hour estimates	
Non-compliance	Description
Audit Ref: 9.4 With: 15 Schedule 15.2 From: 01-Jul-22 To: 01-Dec-22	TODD Zero HHR estimates were applied for “active” ICPs with less than one week of history before the process was changed to estimate based on the ANZSIC code during the audit. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	Controls are strong because the process was changed to estimate based on ANZSIC code where there is insufficient meter data history to create an estimate. The impact is low because TODD estimates are replaced with actual data and washed up and a small number of ICPs are expected to be affected.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>TODD has updated our process to include using ANSZIC codes for providing HHR estimates on HHR ICPs with active ICPs with no historical data.</p>	June 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>ANSZIC Codes are now included to help provide HHR estimates.</p>	June 2024	

Electronic meter readings and estimated readings	
Non-compliance	Description
<p>Audit Ref: 9.6</p> <p>With: 17 Schedule 15.2</p> <p>From: 01-Jun-23</p> <p>To: 31-May-24</p>	<p>TODD</p> <p>During EDMl's agent audit, ICP 1099576180CN5A1 meter 212615969 had a Voltage Tolerance Failure/Error in March 2023. This was not sent to TODD and no action has been taken.</p> <p>WISE</p> <p>AMI Meter event logs are not reviewed for all event types.</p> <p>HNET</p> <p>AMI Meter event logs are not consistently reviewed.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p>Low</p>	<p>Controls are moderate overall. Most ICPs are supplied by TODD who now have processes to ensure that meter events requiring action are identified, investigated and resolved, but WISE and HNET require improvement to ensure that all events requiring action are consistently identified.</p> <p>The impact is low, as any events identified by the MEP or agent are consistently investigated and resolved according to the MEP or agent's instructions.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance disputed.</p> <p>TODD's understanding is ICP 1099576180CN5A1 is only able to have reads provided through the MEP back office. As a result, Clause 8 Schedule 10.6 rules apply, and the responsibility is the MEPs rather than the retailers.</p> <p>WISE:</p> <p>Non-Compliance accepted.</p> <p>WISE has accepted the recommendation of the auditor and will be widening the review process to include all metering events.</p> <p>HNET:</p> <p>Non-Compliance accepted.</p> <p>HNET accepts the auditor's recommendation. AMI Meter event logs and time synchronisation reports process will be established to review reporting provided from MEPs and where issues exist immediately raise jobs to replace meters impacted.</p>	<p>Ongoing</p> <p>Q3 2024</p> <p>Q3 2024</p>	<p>TODD: disputed</p> <p>TODD believes that investigating this issue should be the responsibility of the MEP only.</p> <p>WISE: identified</p> <p>HNET: identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>TODD:</p> <p>TODD is engaging with the MEP for the ICP impacted to confirm read attainment and therefore metering event notification process requirements.</p> <p>WISE & HNET:</p> <p>As above</p>	<p>Q3 2024</p>	

Calculation of ICP days	
Non-compliance	Description
<p>Audit Ref: 11.2</p> <p>With: 15.6</p>	<p>TODD</p> <p>ICP 0000604730MP151 had accidentally been closed one day early resulting in under submission of one ICP day at CUL0661 for July 2023. The error was corrected on discovery during the audit and revised submission data will be washed up.</p> <p>WISE</p>

<p>From: 1-Jun-23 To: 30-Apr-24</p>	<p>Between June 2023 and April 2024 ICP days and volumes for ICP 0009951282CNBD7 were recorded against BOB0331 but should have been recorded against BOB1101. The NSP has been corrected and revised submission information will be washed up.</p> <p>HNET ICP 0326516743LC9D7 had an incorrect submission type recorded on the registry from 1 July 2023 until 23 April 2024 which prevented TODD from providing HHR volumes and ICP days. The submission type error was corrected as soon as it was identified and revised submission data will be washed up.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1</p>		
<p>Audit risk rating</p>	<p>Rationale for audit risk rating</p>		
<p>Low</p>	<p>The controls are strong, and sufficient to ensure that ICP days are normally reported correctly. The issues causing inaccurate ICP days submission were isolated. Corrections have been made and revised submission data washed up.</p>		
<p>Actions taken to resolve the issue</p>		<p>Completion date</p>	<p>Remedial action status</p>
<p>TODD: Non-Compliance accepted. 0000604730MP151 issue has been corrected during the audit and will be washed up.</p> <p>WISE: Non-Compliance accepted. WISE did not receive the network EDA file for the change of ICP 0009951282CNBD7 from BOB0331 to BOB1101. WISE manually corrected to reflect the change to BOB1101 on April 3 2024.</p> <p>HNET: Non-Compliance accepted. ICP 0326516743LC9D7 was initially gained as NHH and later changed to HHR. HNET was unaware that the trader's submission type needed to be changed in the Registry. This was rectified upon this being raised.</p>		<p>June 2024 April 2024 July 2023</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date
<p>TODD:</p> <p>TODD will continue focusing on optimising its standard and continue to uphold checks to ensure discrepancies are looked into in a timely manner.</p> <p>WISE:</p> <p>WISE will implement a monitoring process to track mismatches between the WISE system and EA's Registry data to prevent misalignment.</p> <p>HNET:</p> <p>HNET is now aware of the requirement to update the trader submission type and has incorporated this into their standard processes.</p>	<p>Ongoing</p> <p>Q3 2024</p> <p>July 2023</p>

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.3</p> <p>With: 15.7</p> <p>From: 01-Sep-22</p> <p>To: 31-Aug-23</p>	<p>WISE</p> <p>Billed data was double counted in the AV120 submission in September 2022 and August 2023. The process has been corrected to prevent recurrence of this issue.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong, because the process has been adjusted to ensure that billed data is not double counted. The audit risk rating is low because the submission data is correct, and the billed data is only used to check the reasonableness of the submission data.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>WISE:</p> <p>Non-Compliance accepted.</p> <p>During the generation of wash-up data for September 2023, a duplication issue occurred. This was corrected in the subsequent wash-up process</p>	October 2023	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
WISE: WISE has revised the process for generating wash-up data to prevent data duplication.	October 2023

HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: 15.8 From 01-Apr 23 To: 23-Apr-24	<p>TODD</p> <p>Two submissions for April 2023 (before TODD included validation of aggregates against volumes as part of their pre submission checks) had X flow differences of around ± 700 kWh between the volumes and aggregates, which are believed to be caused by a small number of ICPs which had duplicated volumes in the aggregates report before this issue was corrected. The differences were washed out by Revision 3.</p> <p>HNET</p> <p>ICP 0326516743LC9D7 had an incorrect submission type recorded on the registry from 1 July 2023 until 23 April 2024 which prevented TODD from providing HHR volumes and ICP days. The submission type error was corrected as soon as it was identified and revised submission data will be washed up.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong, and sufficient to ensure that HHR volumes and aggregates are normally reported correctly. The issues causing inaccurate submission were isolated. Corrections have been made and revised submission data washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>Issue was identified where comparison checks between and has since not occurred. As per previous audit, checks were made to confirm there was no discrepancies between HHR aggregate submissions since.</p> <p>HNET:</p>	June 2024	Identified

Non-Compliance accepted. See section 11.2		
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD: Underlying discrepancy was fixed in the previous audit. HNET: As above	June 2024	

Creation of submission information		
Non-compliance	Description	
Audit Ref: 12.2 With: 15.4 From: 01-Apr-23 To: 31-May-24	<p>TODD ICPs 0000052655HB79C and ICP 0000831042HBD34 underwent meter upgrades and had HHR volumes on the day of the meter change omitted. ICP 0000541521TUFFE had no unmetered load reported because an opening meter read was not recorded on the dummy meter register and has been corrected. Zero HHR estimates were applied for” active” ICPs with less than one week of history before the process was changed to estimate based on the ANZSIC code during the audit.</p> <p>HNET ICP 0326516743LC9D7 had an incorrect submission type recorded on the registry from 1 July 2023 until 23 April 2024 which prevented TODD from providing HHR volumes and ICP days. The submission type error was corrected as soon as it was identified and revised submission data will be washed up.</p> <p>Potential impact: None Actual impact: None Audit history: Three times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls over submission completeness are strong overall, and sufficient to ensure that most submission data is accurate. The errors identified were isolated.</p> <p>The impact is low overall based on the volume differences identified, and because revised submission information has been or will be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>0000052655HB79C and 0000831042HBD34 Where meter upgrades are undertaken with HHR ICPs, updates and dates will align so all volumes are accounted for.</p> <p>0000541521TUFFE Unmetered load register was created and has been corrected.</p> <p>Zero estimates As per section 9.4, previous process was not passed down to include using ANSZIC codes for providing HHR estimates on HHR ICPs with active ICPs with no historical data. Process has been identified again and included back into the process.</p> <p>HNET:</p> <p>Non-Compliance accepted.</p> <p>See section 11.2</p>	<p>July 2024</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD:</p> <p>As per section 9.4 - ANAZIC Codes are now included again to help provide HHR estimate.</p> <p>0000541521TUFFE will have unreported load accounted for in all washup submissions going forward.</p> <p>0000052655HB79C and 0000831042HBD34 will have all unaccounted for volumes accounted for in washup submission.</p> <p>HNET:</p> <p>As above</p>	<p>July 2024</p>	

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7 With: 15.12</p> <p>From: 01-Apr-23 To: 31-May-24</p>	<p>TODD ICPs 0000052655HB79C and ICP 0000831042HBD34 underwent meter upgrades and had HHR volumes on the day of the meter change omitted. ICP 0000541521TUFFE had no unmetered load reported because an opening meter read was not recorded on the dummy meter register and has been corrected. Zero HHR estimates were applied for “active” ICPs with less than one week of history before the process was changed to estimate based on the ANZSIC code during the audit.</p> <p>WISE ICP days and volumes for ICP 0009951282CNBD7 were recorded against BOB0331 but should have been recorded against BOB1101. The NSP has been corrected and revised submission information will be washed up.</p> <p>HNET ICP 0326516743LC9D7 had an incorrect submission type recorded on the registry from 1 July 2023 until 23 April 2024 which prevented TODD from providing HHR volumes and ICP days. The submission type error was corrected as soon as it was identified and revised submission data will be washed up.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls over submission accuracy are strong overall, and sufficient to ensure that most submission data is accurate. The errors identified were isolated.</p> <p>The impact is low overall based on the volume differences identified, and because revised submission information has been or will be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted. As per section 12.2</p> <p>WISE: Non-Compliance accepted.</p>	July 2024	Identified

As per section 11.2		
HNET:		
Non-Compliance accepted.		
As per section 11.2		
Preventative actions taken to ensure no further issues will occur	Completion date	
TODD, WISE & HNET:	July 2024	
As above		

Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: 4 Schedule 15.2 From: 01-Jan-22 To: 31-May-24	TODD TODD does not enter permanent estimate readings before Revision 14 is created, and some forward estimate remains at Revision 14. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are moderate. Read attainment processes are robust but for a small proportion of ICPs where actual readings are not obtained within 14 months a permanent estimate reading is not entered. The audit is risk rating is low because there are sound estimation processes.	
Actions taken to resolve the issue	Completion date	Remedial action status
TODD: Non-Compliance accepted. TODD will create documentation and provide training to current staff on the permanent estimate process along with an investigation of each ICP to evaluate its eligibility for a permanent estimate	November 2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>TODD:</p> <p>Subject to confirmation, permanent estimate readings will be inserted with no reasonable endeavors eligibility investigation to simplify and/or automate the process.</p>	<p>November 2024</p>	
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Forward estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.12</p> <p>With: 6 Schedule 15.3</p> <p>From: 01-Apr-22</p> <p>To: 31-Dec-23</p>	<p>TODD, HNET and WISE</p> <p>Some balancing area differences where the variation between revisions was more than $\pm 15\%$ were caused by forward estimates which were higher or lower than the actual data.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>Controls are strong, as they are sufficient to ensure most data is accurate. The audit risk rating is low because good estimation processes are in place, and initial data is replaced with revised data and washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD:</p> <p>Non-Compliance accepted.</p> <p>Following our previous audit non-compliance under this clause, TODD have continued to use end of month reads for ICPs where AMI data is available. This has resulted in TODD's initial submissions becoming more accurate as the proportion of Historic estimates increase and Forward estimates decrease.</p> <p>Additionally, increased consumption based on starting and ending end of month reads reduces the effect of profiling, further reducing the variance between the initial submission and subsequent revisions. TODD incorporated this change for submission months starting February 2019 onwards.</p> <p>WISE:</p>	<p>Ongoing</p>	<p>Identified</p>

<p>Non-Compliance accepted.</p> <p>Forward estimation in WISE is calculated based on the usage entered by the customer upon registration, while estimate reads are based on actual usage data from past reading history. Occasionally, significant discrepancies can occur due to backdated bills from previous retailers, in these instances WISE utilises the RR process to adjust the reading values to minimise discrepancies.</p> <p>HNET:</p> <p>Non-Compliance accepted.</p> <p>There was a significant discrepancy of over due to incorrectly entered profile information for ICP 0326516743LC9D7. Refer to section 11.2</p>		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD:</p> <p>TODD will continue entering end of month reads for ICPs where AMI data is available. This will ensure a high degree of accuracy in the initial submission and smaller variances between the initial and subsequent revisions.</p> <p>TODD recognises it will be an on-going challenge to achieve full compliance with this clause due to factors such as legacy meters, mid-month reads and the effects of aggressive profiling.</p> <p>WISE & HNET:</p> <p>As above</p>	<p>Ongoing</p>	

Compulsory meter reading after profile change	
Non-compliance	Description
<p>Audit Ref: 12.13 With: 7 Schedule 15.3</p> <p>From: 02-May-23 To: 02-May-23</p>	<p>HNET</p> <p>ICP 1000549774PC17C's profile change was not made on an actual or permanent estimate reading. The ICP switched in on 28 April 2023 and no actual or permanent estimate readings were available until 23 May 2023.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p>

	Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are weak because they do not ensure that profile changes are made on the correct date or on an actual or permanent estimate reading. The impact is low because a small number of profile changes occur.		
Actions taken to resolve the issue		Completion date	Remedial action status
HNET: Non-Compliance accepted		Q1 2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
HNET: HNET will provide internal training focused on the accuracy of event dates and will also ensure the addition of actual or permanent estimated readings for the events.		Q1 2025	

Reporting resolution			
Non-compliance		Description	
Audit Ref: 13.2 With: 9 Schedule 15.3 From: 01-Oct-22 To: 31-Mar-24		WISE Up to April 2024, AV080 submission data was produced to four decimal places and rounded to three decimal places. Rounding was updated in April 2024 and submissions are now rounded to two decimal places. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are strong because the files are now rounded to two decimal places. The impact is low because the submission information was accurate and the reconciliation manager's system accepted the files with the extra decimal places.	
Actions taken to resolve the issue		Completion date	Remedial action status
WISE: Non-Compliance accepted.		April 2024	Cleared

WISE implemented changes to the submission rounding in April 2024 and are now two decimal places. There was no resolution required as the original submissions prior to April 2024 with additional decimal places were accepted by the reconciliation manager.		
Preventative actions taken to ensure no further issues will occur	Completion date	
WISE: As above	April 2024	

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: 10 of Schedule 15.3 From: 01-Jan-22 To: 31-May-23	<p>TODD Historic estimate targets were not met for some revision 3, 7 and 14 submissions.</p> <p>HNET Historic estimate targets were not met for some revision 3 and 7 submissions.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Overall, the controls are assessed to be moderate because compliance is achieved in most instances, but some improvements can be made.</p> <p>The impact is assessed to be low as good estimation processes are in place where historic estimate cannot be obtained.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TODD: Non-Compliance accepted.</p> <p>TODD continues to actively work on gaining an actual read at the earliest timeframe as possible.</p> <p>Forward Estimates at R14 continue to be checked. TODD will again review the process of creating permanent estimate readings to ensure that we have historical estimates for all ICPs that have not obtained an 'Actual read' by R14 and are eligible for a permanent estimate.</p>	Ongoing	Identified

<p>HNET:</p> <p>Non-Compliance accepted.</p> <p>HNET endeavours to obtain actual reads for NHH meters. There were significant challenges faced by our external partner in maintaining sufficient workforce to conduct readings over 2023</p>		
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>TODD:</p> <p>TODD will continue focusing on optimising its standard by identifying and monitoring its performance and opportunities for improvement.</p> <p>HNET:</p> <p>HNET will continue to work with our external partners and contractors to make best efforts in gaining actual readings. There will a focus on migration of legacy meters to smart meters for the remainder of 2024 to mitigate the resource constraints faced by our external partners.</p>	<p>Ongoing</p>	