

Compliance plan for Octopus Energy Reconciliation Participant Audit– 2024

Relevant information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11.2 & 15.2</p> <p>From: 01-May-23</p> <p>To: 15-Apr-24</p>	<p>Some inaccurate data is recorded and was not updated as soon as practicable.</p> <p>Some submission data was inaccurate and was not corrected at the next available opportunity.</p> <p>Potential impact: Medium</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 rated as moderate at the time of the audit because the validation reporting is not sufficiently robust to identify all common types of exceptions. Some submission issues identified are not resolved in a timely manner.</p> <p>The impact is assessed to be low based on the minor impact on submission accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>ARC Meters</p> <p>ARC meters are currently in the process of being displaced. On 17 July there were only two remaining OCTO held ICPs with these meters. As per instructions from Bluecurrent we nominated NGCM as the new MEP in June 2024 so they will be replaced in the near future.</p> <p>UML</p> <p>Strong monitoring in place. Submissions up-to-date for all but two months. See sections 3.7 Changes to unmetered load and 5.4 Maintaining shared unmetered load for full details.</p> <p>CS Reads</p> <p>HHR volume corrections have been applied for 0044241000PC6AA. Switch in read in details were adjusted according to the RR accepted. Data has already begun to be included in revisions.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As detailed above		Ongoing	

Meter bridging		
Non-compliance	Description	
Audit Ref: 2.17 With: Clause 2A of Schedule 15.2 From: 15-May-23 To: 10-May-24	ICP 0000929796TU717 was bridged by Octopus Energy's field service agent and the MEP was not notified within one business day. 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 as while there was reporting in place to monitor zero consuming ICPs, this was not being consistently reviewed. The audit risk rating is low as only one ICP is identified and the affected ICP is metering installation category 1, so the affected volumes are quite small	
Actions taken to resolve the issue	Completion date	Remedial action status
HHR volume corrections have been applied. Estimates were created using the actual data received once the meters were unbridged. Submission data is already being included for 0001541100PC4DB and data for 0000929796TU717 will be included in the next revisions.	19 July 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption. The documentation around these processes has been further developed and the team now has a more frequent schedule for working on these.	18 July 2024	

Changes to registry information			
Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-May-23</p> <p>To: 15-Apr-24</p>	<p>22 late status updates.</p> <p>Six late trader updates relating to backdated MEP nominations.</p> <p>54 late ANZSIC code updates</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 recorded as moderate. The manual nature of the current process to update status events can lead to delays where resourcing is low and there is a risk some updates are missed.</p> <p>The impact on settlement and participants is minor. While the 22 late status updates were for HHR submitted ICPs, the late updates have impacted the Reconciliation Managers calculation of seasonal shapes for all NHH retailers, the overall number of updates exceeding one consumption period is small, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The query that generates the “TRM” update file for both ANZSIC and MEP nominations has been changed to utilise the date we identify the need to update the code or nominate the MEP – previously we were incorrectly backdating the update date to the date we gained the ICP. We have also added a system hold for previously non-resi ANZSIC ICPs at the point of switch-in and trained our team on finding out and updating the current status.</p>		June 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As above: TRM update file corrected. System hold to stop non-resi ICPs slipping through. Additional staff training completed.</p>		June 2024	

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-May-23</p> <p>To: 15-Apr-24</p>	<p>Eight incorrect ANZSIC codes identified from a sample of 15.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong as there is a process to confirm ANZSIC with consumers as part of the onboarding process based on consumer name and also Where the ANZSIC code was non residential prior to switching to Octopus.</p> <p>The impact is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have also added a hold for previously non-resi ANZSIC ICPs at switch-in. There is then a process for our team to contact the customer to find out the correct code.	June 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Staff training is ongoing and the new onboarding process (with an automated system-hold) is in place. Monthly database checks continue to look for non-residential price category codes, business names, and the ICP's ANZSIC history.	Ongoing	

Changes to unmetered load		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: 14-Dec-23</p> <p>To: 24-May-24</p>	<p>ICP (0007021534RN247) with shared unmetered load (0.05 kWh / day) missing a daily kWh value populated in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because there was no process to monitor potential new unmetered load or changes to UML during the full audit period. The new automated process has been tested and will clearly identify UML exceptions going forward.</p> <p>The impact on settlement and participants is low; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Our system prevents ICPs with UML from signing up. In light of the situation outlined above by the auditor, strong automated monitoring and alerting of UML has been put in place and our team is fully-versed in how to handle these situations in the future. The monitoring includes a UML indicator on our reporting dashboard and automated Slack alerts from this if any ICPs with UML are identified.</p> <p>We also run the Audit Compliance Report twice a month (as part of our Business Day 4 and 13 checking processes prior to the RM submissions).</p> <p>The ICP concerned has now switched out and with the controls in place we are confident that any future similar situations will be resolved very promptly.</p> <p>We have submitted data to the market for the UML that we missed between Dec 2023 and June 2024. To-date data has been provided in the washup files for all but two months (Jan and Feb 2024). These will be done with the appropriate BD13 washup files over the next couple of months.</p>	June to August 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above, strong monitoring is in place.	17 July 2024	

Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 18-Jan-24</p> <p>To: 20-Jan-24</p>	<p>Six ICPs with consumption recorded during inactive periods resulting in under submission of 7,635 kWh.</p> <p>One ICP (0000500615CEEC5) with incorrect inactive status reason code.</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 rated as moderate overall. Most disconnection information checked was processed accurately, but there is room for improvement.</p> <p>The impact on settlement and participants is low; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We are currently working through the cleanup of the affected ICPs. There were some status date misalignments identified and we have updated these. There is still work to do and we will continue to progress this.</p> <p>The newly documented process for changing status to inactive requires the team to set the status date for the following day rather than part way through the day to avoid further misalignment.</p>	In progress	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption. The documentation around these processes has been further developed and the team now has a more frequent schedule for working on these.</p> <p>The reason codes that should apply to Disconnections and for Decommissions have been updated in our process documentation.</p> <p>There is a new documented process for changing status to inactive which requires the team to set the status date for the following day rather than part way through the day to avoid further misalignment and submission consumption impact.</p>	In progress	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 01-May-23 To: 15-Apr-24	<p>The CS file for two ICPs was sent more than five business days after the proposed switch date.</p> <p>The method to calculate average daily consumption is not consistent with the average consumption for the last read to read period as described by the code.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because the average daily consumption is a reasonable reflection of an ICPs consumption pattern, however it does not meet the definition of how this is to be calculated.</p> <p>The impact of the average daily consumption calculation is low therefore the risk is low.</p>	
Actions taken to resolve the issue		Completion date
As we are only supplying smart meters. We believe the data we're providing in CS files is more accurate than what is specified in the code.		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We think the code should be changed to better utilise smart meter data and in May 2024 we wrote to the EA proposing a code change for this issue. The code in its current form is designed for non-ami.</p> <p>The response back from the EA confirmed that this issue is actively being looked at and is a part of the Code Review Programme.</p>		n/a
		Investigating

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 01-May-23</p> <p>To: 15-Apr-24</p>	<p>HHR estimated volumes not rescaled for ICP 0044241000PC6AA on receipt of an accepted amended read from an incoming RR file resulting in an over submission of 3,436 kWh.</p> <p>Three RR breaches were recorded during the audit period.</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 recorded as moderate because Octopus needs to ensure no volume is lost during the switch process either as gaining or losing trader.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have undertaken further training for our Energy Specialists recently and have updated our documentation with a step-by-step guide.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Along with the extra training and documentation the team are peer reviewing one another's RRs to ensure the learning is cemented and to minimise the chance of errors. Introduction of automated jobs to generate RR files in Robotron for ICPs with discrepancies between CS and Initial reads.	Ongoing	

Losing trader provides information - switch move			
Non-compliance		Description	
Audit Ref: 4.8 With: Clauses 10(1) Schedule 11.3 From: 12-May-23 To: 30-Oct-23		11 T2 breaches. One AN Breach 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 recorded as moderate as the processes to ensure AN and CS files are sent on time do not have a reliable monitoring step to ensure that where the automated process fails that these exceptions are identified prior to the deadline for a response passes. The impact was low due to only 11 affected CS files were identified.	
Actions taken to resolve the issue			Completion date
Last year we made system changes to ensure that the CS is sent within 5 business days of the NT. There is still the possibility of human error where something stops the system automatically stepping through the process and manual intervention is required. We'll continue to keep focus on this and educate the team on how to meet these requirements.			Ongoing
Preventative actions taken to ensure no further issues will occur			Completion date
As per the auditor's recommendation we are making the Breach Current Detail report part of our regular processes.			July 2024
Remedial action status			
Identified			

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 01-May-22 To: 15-Apr-24	The method to calculate average daily consumption is not consistent with the average consumption for the last read to read period. 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 recorded as strong because the average daily consumption is a reasonable reflection of an ICPs consumption pattern, however, it does not meet the definition of how this is to be calculated. The impact of the average daily consumption calculation is low therefore the risk is low.	
Actions taken to resolve the issue		Completion date
n/a - see comments below		n/a
Preventative actions taken to ensure no further issues will occur		Completion date
We think the code should be changed to better utilise smart meter data and in May 2024 we wrote to the EA proposing a code change for this issue. The code in its current form is designed for non-ami. The response back from the EA confirmed that this issue is actively being looked at and is a part of the Code Review Programme.		n/a
		Investigating

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 01-Apr-23 To: 15-Apr-24	Three SR breaches. One AW Breach 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 recorded as strong because they mitigate risk to an acceptable level. 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
Octopus has and will always look to correct errors in switching regardless of time period. Particularly, if we switched a wrong property for a customer, will always work with the alt retailer to fix the switch problem.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have developed a switching matrix document. This provides our team with explanations of the reason codes to minimise errors.	July 2024	

Maintaining shared unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 11.14</p> <p>From: 14-Dec-23</p> <p>To: 12-Jun-24</p>	<p>ICP (0007021534RN247) with shared unmetered load (0.05 kWh / day) was not correctly recorded in the registry with a daily kWh value, UML flag set to Y, NHH submission type set to Y or a NHH profile being recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: none</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because there was no process to monitor potential new unmetered load during the full audit period. The new automated process has been tested and will clearly identify UML exceptions going forward.</p> <p>The impact on settlement and participants is low; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Our system prevents ICPs with UML from signing up. In light of the situation outlined above by the auditor, strong automated monitoring and alerting of UML has been put in place and our team is fully-versed in how to handle these situations in the future. The monitoring includes a UML indicator on our reporting dashboard and automated Slack alerts from this if any ICPs with UML are identified.</p> <p>We also run the Audit Compliance Report twice a month (as part of our Business Day 4 and 13 checking processes prior to the RM submissions).</p> <p>The ICP concerned has now switched out and with the controls in place we are confident that any future similar situations will be resolved very promptly.</p> <p>We have submitted data to the market for the UML that we missed between Dec 2023 and June 2024. To-date data has been provided in the washup files for all but two months (Jan and Feb 2024). These will be done with the appropriate BD13 washup files over the next couple of months.</p>	June 2024 to Aug 2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As above, we have put strong controls in place and we are confident that if UML is added to any OCTO held ICPs we will act on that promptly.	17 July 2024	

Electricity conveyed & notification by embedded generators			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13, Clause 10.24 and 15.13</p> <p>From: 15-May-23</p> <p>To: 10-May-24</p>	<p>Submission had not occurred for three HHR ICPs with distributed generation and the RM was not notified of gifting.</p> <p>For one ICP (0000929796TU717) the meter was bridged during the audit period meaning volumes were not quantified in accordance with the code.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because although reporting is in place, the report was not consistently reviewed during the audit period.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>HHR volume corrections have been applied for 0000929796TU717. Estimates were created using the actual data received once the meters were unbridged. Submission data will be included in the next revisions.</p> <p>Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption. The documentation around these processes has been further developed and the team now has a more frequent schedule for working on these.</p> <p>We also have a query that will pick up DG with no export meter. This will be added to the dashboard mentioned above and any discrepancies acted upon.</p> <p>We will establish a process around gifting in the next couple of months.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Actions as detailed above		Ongoing	

Reporting of defective metering installations			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clauses 10.43(2) and (3)</p> <p>From: 03-Jan-24</p> <p>To: 19-Apr-24</p>	<p>ICP 0000929796TU717 was bridged by an Octopus field service agent on 17 May 2023 and the MEP was not notified that the meter was defective until 19 April 2024.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are moderate as while there was reporting in place to monitor zero consuming ICPs, this was not being consistently reviewed.</p> <p>The audit risk rating is low as only one ICP is identified and the affected ICP is metering installation category 1, so the affected volumes are quite small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
HHR volume corrections have been applied for 0000929796TU717. Estimates were created using the actual data received once the meters were unbridged. Submission data will be included in the next revisions.		June thru August 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption. The documentation around these processes has been further developed and the team now has a more frequent schedule for working on these.		July 2024	

Collection of information by certified reconciliation participant		
Non-compliance	Description	
<p>Audit Ref: 6.5</p> <p>With: Clause 2 Schedule 15.2</p> <p>From: 03-Jan-24</p> <p>To: 31-May-24</p>	<p>ICP 0087050055WE1E3 not interrogated within the maximum interrogation cycle.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are moderate as while the system can perform reasonable estimations using historical consumption data as a reference, however due to a fire occurring at the ICP there is no ability to ensure the volume estimated relates to actual consumption consumed at the ICP during this affected period.</p> <p>The audit risk rating is low as only one ICP is identified and the affected ICP is metering installation category 1, so the affected volumes are quite small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A work order was raised for this non communicating ICP 0087050055WE1E3 on 30/01/24. Currently the property is off limits due to fire damage, safety fences and asbestos. The building is to be demolished with the meter to be decommissioned. There are still a number of communicating meters on different ICPs and the facilities manager is also looking to get an electrician involved.</p> <p>We are continuing to work with the MEP, the facilities manager and the network to try and resolve. Currently consumption is being estimated until we are able to get a meter removal read.</p>	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Largely a one off circumstance in the case of this ICP. We will be defining and documenting our process for Time Sync reports over the coming months.	Ongoing	

Correction of HHR metering information		
Non-compliance	Description	
<p>Audit Ref: 8.2 With: Clause 19(2) Schedule 15.2</p> <p>From: 01-May-23 To: 15-Apr-24</p>	<p>Corrections for four sampled meter changes did not ensure all consumption recorded by the removed meter was included in the volume correction.</p> <p>Correction not applied for ICP 0044241000PC6AA where a switch event read amendment was accepted but the estimated HHR data was not corrected to align with this revised switch event reading.</p> <p>Initial estimation of missing HHR volumes is not corrected when a partial replacement of missing HHR volumes with actual HHR volumes occurs to ensure overall HHR volumes still aligns with the difference between register reads either side of the estimated period.</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 recorded as moderate because while estimates are created, they are not always reviewed or revised where some updated information is provided from either the switching process or from the AMI MEP.</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
<p>HHR volume corrections have been applied. Estimates were created using the actual data received once the meters were unbridged. Submission data for 0000929796TU717 will be included in the next revisions.</p> <p>HHR volume corrections have been applied for 0044241000PC6AA. Switch in read in details were adjusted according to the RR accepted. Data has already started to be included in revisions.</p> <p>Due to limitations in the registry where only full days can have a particular status some consumption data is missed after meter changes. The EA could also look at introducing timestamps within registry event dates.</p> <p>We have had one session with Robotron for this and will consult with them as part of improving our process and documentation for missing volumes and ensuring re-scaling occurs.</p>	June thru August 2024	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption.</p> <p>The documentation around this and dealing with RRs and correcting HHR has been further developed.</p>	Ongoing	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15 Schedule 15.2</p> <p>From: 01-Apr-23</p> <p>To: 15-May-24</p>	<p>Corrections for four sampled meter changes did not ensure all consumption recorded by the removed meter was included in the volume corrections (148 kWh).</p> <p>Correction not applied for the bridged period for ICP 0000929796TU717.</p> <p>Correction not applied for ICP 0044241000PC6AA where a switch event read amendment was accepted but the estimated HHR data was not corrected to align with this revised switch event reading.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because while estimates are created, they are not always timely and are not always reviewed or revised where some updated information is provided from either the switching process or from the AMI MEP.</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
<p>HHR volume corrections have been applied. Estimates were created using the actual data received once the meters were unbridged. Submission data for 0000929796TU717 will be included in the next revisions.</p> <p>HHR volume corrections have been applied for 0044241000PC6AA. Switch in read in details were adjusted according to the RR accepted. Data has already started to be included in revisions.</p> <p>Due to limitations in the registry where only full days can have a particular status some consumption data is missed after meter changes. The EA could also look at introducing timestamps within registry event dates.</p> <p>We have had one session with Robotron for this and will consult with them as part of improving our process and documentation for missing volumes and ensuring re-scaling occurs.</p>	June thru Aug 2024	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption.</p> <p>The documentation around this and dealing with RRs and correcting HHR has been further developed.</p>	Ongoing	

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Apr-23 To: 15-Apr-24	Event logs not routinely reviewed across all AMI providers. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because most validations occur. The impact on settlement and participants is minor; therefore, the audit risk rating is low. Meter critical events are individually emailed by MEPs for Octopus to action.	
Actions taken to resolve the issue		Completion date
MEPs have been contacted to ask for help in how to interpret and what to do with these files. In the meantime we rely on the Robotron validation - as noted by the auditor this covers most of the required validations.		ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
None yet, however we will continue to engage with the MEP and will put processes and documentation in place over time.		ongoing
Investigating		

Calculation of ICP days			
Non-compliance	Description		
<p>Audit Ref: 11.2 With: Clause 15.6</p> <p>From: 01-Apr-23 To: 31-Dec-23</p>	<p>ICP days values were not provided for ICPs three ICPs (0000009610CPA7E – Oct 2022 R14 & May 2023 R7, 0000111580WEFC5 – Jan 2023 R7 & May 2023 R3, 0000057086TR7EF – Oct 2022 R3) where volumes were present in AV-090 and AV-140.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong as they are sufficient to ensure that most ICPs are correctly reported. The issue was system related and required the vendor to implement a code fix.</p> <p>The impact is assessed to be low, as updated data will be provided through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The issues were caused by how the *esales system handled rejected AW withdrawals. Robotron have put in a solution to stop future instances of this.		10 June 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		10 June 2024	

Creation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 01-Apr-23 To: 15-Apr-24</p>	<p>HHR estimated volumes not rescaled for ICP 0044241000PC6AA on receipt of an accepted amended read from an incoming RR file resulting in an over submission of 3,436 kWh.</p> <p>Six ICPs with consumption recorded during inactive periods resulting in under submission of 7,635 kWh HHR volumes for day of disconnection not included in submission.</p> <p>HHR generation kWh not submitted at the earliest opportunity for three ICPs.</p> <p>Corrections for four sampled meter changes did not ensure all consumption recorded by the removed meter was included in the volume correction.</p> <p>NHH unmetered load submissions not performed from December 2023 for ICP 0007021534RN247.</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
<p>Low</p>	<p>The controls are rated as moderate because while most submission information was accurate, there is room for improvement around the management of:</p> <ul style="list-style-type: none"> • HHR estimates where switch read amendments are received and accepted • inactive consumption is identified and resolved at the earliest opportunity • ensuring all HHR volumes are included for the day of disconnection. <p>The impact is low because as only a small number of ICPs are impacted.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>We are currently working through the clean up. The data for a number of these is now in the market.</p> <p>HHR volume corrections have been applied for 0000929796TU717. Estimates were created using the actual data received once the meters were unbridged. Submission data will be included in the next revisions.</p> <p>HHR volume corrections have been applied for 0044241000PC6AA. Switch in read in details were adjusted according to the RR accepted. Data has already begun to be included in revisions.</p> <p>We have submitted data for 0007021534RN247 to the market for the UML that we missed between Dec 2023 and June 2024. To-date data has been provided in the washup files for all but two months (Jan and Feb 2024). These will be done with the appropriate BD13 washup files over the next couple of months.</p> <p>There is ongoing training and discussion of these issues within the operations team and we are using the identified ICPs as examples.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Lots of monitoring is in place, as discussed multiple times in this report. This will mean we will be better able to highlight inactive ICPs (consuming and not) and possible bridged meters.</p>	Ongoing	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 01-Apr-23 To: 15-Apr-24	Some submission data was inaccurate and was not corrected at the next available opportunity. Arc provides interval data to one decimal place, which is not considered to be sufficiently accurate. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as the monitoring and correction process have been improved during the audit period but there is still room for improvement. The impact is assessed to be low as the impact on submission accuracy is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
<u>ARC Meters</u> ARC meters are currently in the process of being displaced. On 17 July there were only two remaining OCTO held ICPs with these meters. As per instructions from Bluecurrent we nominated NGCM as the new MEP in June 2024 so they will be replaced in the near future. <u>UML</u> Strong monitoring in place. Submissions up-to-date for all but two months. See sections 3.7 Changes to unmetered load and 5.4 Maintaining shared unmetered load for full details. <u>Bridged and Inactive Meters</u> Monitoring via dashboards has been put in place to identify ICPs where there is a potential bridged meter or where inactive meters are recording consumption. The documentation around these processes has been further developed and the team now has a more frequent schedule for working on these. <u>CS Readings</u> HHR volume corrections have been applied for 0044241000PC6AA. Switch in read in details were adjusted according to the RR accepted. Data has already begun to be included in revisions.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As detailed above...	n/a	

Reconciliation participants to prepare information		
Non-compliance	Description	
<p>Audit Ref: 12.9</p> <p>With: Clause 2 Schedule 15.3</p> <p>From: 14-Dec-23</p> <p>To: 12-Jun-24</p>	<p>ICP (0007021534RN247) with shared unmetered load (0.05 kWh / day) is not included in the submission process</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	
<p>Low</p>	<p>The controls are recorded as moderate because there was no process to monitor potential new unmetered load or changes to UML during the full audit period. The new automated process has been tested and will clearly identify UML exceptions going forward and this will ensure this volume is included in the submission process.</p> <p>The impact on settlement and participants is low; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Our system prevents ICPs with UML from signing up. In light of the situation outlined above by the auditor, strong automated monitoring and alerting of UML has been put in place and our team is fully-versed in how to handle these situations in the future. The monitoring includes a UML indicator on our reporting dashboard and automated Slack alerts from this if any ICPs with UML are identified.</p> <p>We also run the Audit Compliance Report twice a month (as part of our Business Day 4 and 13 checking processes prior to the RM submissions).</p> <p>The ICP concerned has now switched out and with the controls in place we are confident that any future similar situations will be resolved very promptly.</p> <p>We have submitted data to the market for the UML that we missed between Dec 2023 and June 2024. To-date data has been provided in the washup files for all but two months (Jan and Feb 2024). These will be done with the appropriate BD13 washup files over the next couple of months.</p>	<p>June thru Aug 2024</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>As above, strong monitoring is in place and submissions are mostly up to date.</p> <p>Previously emails from the networks regarding UML were being sent to an individual's email address - that person is not involved in day-to-day processes and did not know they were the only recipient. This has been changed to a shared group email so will be seen by several people.</p>	17 July 2024	

Provision of submission information to the RM			
Non-compliance	Description		
<p>Audit Ref: 13.1</p> <p>With: Clause 8. Schedule 15.3</p> <p>From: 14-Dec-23</p> <p>To: 12-Jun-24</p>	<p>Some NHH submission files not submitted between December 2023 and June 2024 relating to one ICP with shared unmetered load</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong as there are strong controls around HHR submissions. The processes around identifying NHH UML loads and the processing of NHHVOLS submission wash up files as soon as practicable once the exception was identified enables the controls to be rated as strong as at the end of the audit period</p> <p>The impact is assessed to be low as the impact on submission accuracy is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Submissions have been made with the Business Day 13 washup files for all but two months (Jan & Feb 2024) between Dec 2023 and Jun 2024. The missing two months will be caught up over the coming couple of months.		Jun-Aug 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Strong controls and alerting are in place. Refer to sections 3.7 Changes to unmetered load and 5.4 Maintaining shared unmetered load for full details.		17 July 2024	