

<p>Time variations were reviewed and Decision made due to flat profile and low load not to adjust each interval as variation between intervals was extremely small and rounding for Reconciliation made the adjustment irrelevant</p> <p>As with many of the Status related non-compliances these are due to other Participants reconnecting sites and then failing to Request the switch, and not restoring the connection to in-Active. Reporting continues to check for these and correct as soon as identified</p> <p>Unmetered Load of 17kwh over the period was identified once WAIK updated the Registry with the Shared unmetered values. This was reviewed and initiation of requesting those customers moved to another retailer was initiated. Volume was reviewed and modelled by creating a Interval dataset, but Reconciliation rounding meant each interval rounded to Zero</p> <p>IHUB Estimates are reviewed and catchup data requested (or re-estimated if no catchup data available at the time of calculation for each Market revision</p>	31/10/2024	Investigating
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>IHUB Estimates > 15 days are indentified with the HHR to Read Checks during Each Revision and Any that have not had catchup data are requested, if no catchup data is available from MEP, the previous MEP Estimation will be replaced with a FOGY Estimate between available reads</p> <p>Follow-up process to be established where ICP moves from a load only to both Load and Generation to ensure EG register is in place. MEP request will be implemented and ICP will be added to Register until it has appropriate metering</p>	31/10/2024	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 27-Feb-24 To: 26-Mar-24	One reconnection was not certified within five business days. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are strong, because there is a process to ensure that ICPs are certified on reconnection, as well as a quarterly process to check all ICPs are certified. The audit risk is low because one ICP was affected by the non-compliance, and it was recertified 51 business days after reconnection.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP have all had Service Requests raised with MEP to Recertify	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Check to ensure ICP is certified before reconnections has been implemented All Sites where bridging or other issues are identified will ensure certification is completed as part of Service Request to resolve	02/08/2024	

Provision of information on dispute resolution scheme			
Non-compliance	Description		
Audit Ref: 2.19 With: Clause 11.30A From: 01-Jan-23 To: 23-Jul-24	Some price change notifications did not contain information on Utilities Disputes. 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 processes have been updated ensure that Utilities Disputes information will be consistently provided for future price change notifications. The impact is low because Utilities Disputes information is provided to all customers on invoices and is also available on each brand's website.		
Actions taken to resolve the issue		Completion date	Remedial action status
FOGY has updated their processes for all brands to ensure that Utilities Disputes information is consistently provided for price change notifications		02/08/2024	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
FOGY has updated their processes for all brands to ensure that Utilities Disputes information is consistently provided for price change notifications		02/08/2024	

Provision of information on electricity plan comparison site		
Non-compliance	Description	
Audit Ref: 2.20 With: Clause 11.30B From: 01-Jan-23 To: 23-Jul-24	Some price change notifications did not contain information on Powerswitch. 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 processes have been updated ensure that Powerswitch information will be consistently provided for future price change notifications. The impact is low because Powerswitch information is provided to all customers with invoices at least annually and is also available on each brand's website.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY has updated their processes for all brands to ensure that Powerswitch information is consistently provided for price change notifications.	02/08/2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY has updated their processes for all brands to ensure that Powerswitch information is consistently provided for price change notifications.	02/08/2024	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 of schedule 11.1</p> <p>From: 31-Mar-23</p> <p>To: 17-May-24</p>	<p>70 late updates to “active” status for reconnections.</p> <p>18 late updates to “inactive” status for disconnections.</p> <p>18 late trader updates.</p> <p>Six ANZSIC code updates were made more than 20 business days after FOGY began trading at the ICP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because a small number and proportion of updates were late. In most cases the late updates were caused by late notice of the required change by another party.</p> <p>The audit risk rating is low because the impact on settlement and participants is minor, and updates were processed in time for revised submission information to be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
In most cases the late updates were caused by late notice of the required change by another party, and all were correct as soon as identified and validated	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to correct as information is made available and validated. Many of these do rely on third parties to provide information to enable FOGY to make appropriate changes	02/08/2024	

Management of “inactive” status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 of schedule 11.1</p> <p>From: 01-Jun-22</p> <p>To: 01-May-24</p>	<p>ICPs 0000042660UNFC5 and 0427243033LC200 have incorrect “inactive” status event dates.</p> <p>ICP 0000164722TR658 appears to have been reconnected by the gaining trader by 27 June 2023 and the ICP switched effective from 28 June 2023. The ICP incorrectly had “inactive” status recorded for at least 27 June 2023.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are moderate, because there are processes to identify and report “inactive” consumption and a small number of exceptions were identified.</p> <p>There is no impact on submission, because all consumption is reported regardless of status.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Issues with other retailer connecting is always challenging, FOGY endeavours to ensure correct statuses at all times. Any issues with dates are corrected ASAP</p>	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Retailers reconnecting sites prior to initiating a switch continue to create issues (and in a number of cases, reconnection occurs and no switch is initiated, leaving the site connected without FOGY’s Knowledge). FOGY continues to monitor Vacant and disconnected sites for Volume and will follow up if any volume is detected. If a meter remains non-communicating for a period after reconnection by a third party, it may be some time before it can be identified</p>	02/08/2024	

Losing trader must provide final information - standard switch		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 5 of schedule 11.3 From: 03-Aug-23 To: 28-Dec-23	Ten CS breaches for switch moves. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong. Most CS files were on time and the late files were mostly delayed due to issues outside of FOGY's direct control. The impact on other participants is low. The late files were up to 63 days overdue, and the switches were completed in time for revised submission information to be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY continues to address these as they arise, the nature of the switching process means these happen and will continue to do so. FOGY works to correct any identified as soon as practical.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY's existing process covers this and will continue to be monitored and improved.	02/08/2024	

Retailers must use same reading - standard switch		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 From: 15-Dec-23 To: 19-Apr-24	One RR breach. 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 one file was late, and the file was delayed while actual readings were obtained to support the RR. The impact is low, because the RR was completed 127 days late, and in time for revision submissions to be provided.	
Actions taken to resolve the issue	Completion date	Remedial action status
FOGY continues to work with other participants to ensure any RR is resolved. it should be noted that as FOGY is an HHR only retailer, RR files are requested for a large number of ICP's based on HHR data received where the Read provided by the Losing retailer is a non-Midnight read. Most that use Register Read for Billing and HHR data for reconciliation are very good about accepting the RR. There are still issues with some participants that Bill on Register Reads (sometimes Manual reads) but they reconcile on HHR data and refuse to accept the RR as the Actual is on the "Same Day" as the switch out date	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY continues to work with other participants to ensure any RR is resolved.	02/08/2024	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 of schedule 11.3 From: 06-Dec-23 To: 08-Apr-24	Three switch move NT files were issued more than three business days after pre conditions were cleared. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong because there are processes in place to ensure that NTs are normally issued as soon as pre-conditions are cleared. The delays were primarily caused by FOGY validating application data, which led to backdated move in dates being confirmed. The impact is low because the NT files were issued a maximum of 23 business days after pre-conditions were cleared.	
Actions taken to resolve the issue	Completion date	Remedial action status
Existing processes endeavour to meet all switching timeframes, but this is not always possible in certain scenarios. FOGY continues to strive to meet the timeframes	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Existing processes are adequate, and any outliers are addressed as quickly as possible within the bounds of ensuring the correct information is available to resolve any issues	02/08/2024	

Losing trader provides information - switch move			
Non-compliance	Description		
Audit Ref: 4.8 With: Clause 10(1) of schedule 11.3 From: 04-Mar-24 To: 05-Mar-24	ICP 0000605524HBBF4 AN-8072264 24 October 2023 had the AA (acknowledge and accept) code manually applied when an AMI meter was installed. One E2 breach where the CS event date was before the gaining trader's requested event date. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are strong, the non-compliances were caused by manual data entry errors. FOGY is aware of the CS event date and AN response code requirement. The audit risk rating is low because: <ul style="list-style-type: none"> the switch was completed one day before the requested date and the gaining trader did not dispute the date for the E2 breach, and AMI meter information was recorded on the registry by the MEP for the ICP with an incorrect response code. 		
Actions taken to resolve the issue		Completion date	Remedial action status
Additional Checks added to manual process to ensure validation of correct codes before submitting		02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional Checks added to manual process to ensure validation of correct codes before submitting		02/08/2024	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 of schedule 11.3 From: 08-Aug-23 To: 13-Dec-23	One RR breach. 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 one file was late, and the file was delayed while actual readings were obtained to support the RR. The impact is low, because the RR was completed 126 days late, and in time for revision submissions to be provided.	
Actions taken to resolve the issue	Completion date	Remedial action status
AS per Earlier non-compliance above. FOGY continues to work with other participants to ensure any RR is resolved. The identification of the RR is based on HHR reads arriving from the MEP and validating that against the Switch Read. This in itself can create delays if the ICP is flagged as Communicating on the Registry (as FOGY only takes on Communicating ICP's), and then no data is available for an extended period.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY continues to work with other participants to ensure any RR is resolved.	02/08/2024	

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 of schedule 11.3</p> <p>From: 03-Aug-23</p> <p>To: 18-Apr-24</p>	<p>Two outgoing NWs had incorrect NW withdrawal advisory codes applied.</p> <p>12 NA breaches.</p> <p>7 SR breaches.</p> <p>Two AW breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. Most files were issued on time, and the late files were caused by double withdrawals or investigation to confirm whether a NW was required and the correct switch details. A small number of manually issued NWs contained incorrect advisory codes.</p> <p>The impact on other participants is low:</p> <ul style="list-style-type: none"> the NWs with incorrect response codes were accepted by the other trader, who understood that an incorrect date was originally requested, and the late files were up to 126 days overdue, and the withdrawals were completed in time for revised submission information to be washed up. 	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Existing processes enable the correction of these, but often these can be complex with Double withdrawals and backdating to correct issues with multiple parties and are prone to errors due to the manual and complex process to resolve.</p> <p>The FOGY team continue to update documentation for any of these more complex issues and best practice approaches to resolve</p>	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>FOGY has and will continue to update documentation for any of these more complex issues and best practice approaches to resolve</p>	02/08/2024	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13 From: 18-Dec-23 To: 23-Jul-24	I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register. Energy is not metered and quantified according to the code where meters are bridged. 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 meters are bridged rarely, and most ICPs with generation have I flow metering installed. The volume of ICPs with bridged meters is small and there are processes in place to ensure that an estimate of consumption is submitted to minimise the impact. The impact is low because I flow meter installation is in progress for ICP 0030326030PCC5C, and corrections are processed to record consumption during bridged periods.	
Actions taken to resolve the issue	Completion date	Remedial action status
Issue was identified and in progress to resolve	31/10/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Existing controls identified this issue and FOGY will continue to monitor and correct as these arise	31/10/2024	

Collection of information by certified reconciliation participant		
Non-compliance	Description	
Audit Ref: 6.5 With: Clause 2 of schedule 15.2 From: 30-May-24 To: 04-Jun-24	Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are moderate, because there are processes to identify and resolve clock synchronisation errors and determine whether they are material. The impact is low because two clock adjustments may have resulted in small volumes being recorded in an incorrect period.	
Actions taken to resolve the issue	Completion date	Remedial action status
As highlighted in earlier Non compliance above – Clock Sync issues like this are evaluated and corrected where there is a measurable shift in volume between intervals as a result of the timesync issue. In both cases the volume shift would have resulted in < 1kwh variance per interval due to the flat load and extremely low volumes of these ICP.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will continue to monitor Meter Events for these timesync errors and request the MEP's to correct where required. And to Estimate where volume shift has an measurable difference	02/08/2024	

Trading period duration		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 13 of schedule 15.2</p> <p>From: 30-May-24</p> <p>To: 04-Jun-24</p>	<p>Two clock synchronisation events over 1800 seconds resulted in trading period durations which were outside the $\pm 0.1\%$ threshold.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are moderate, because there are processes to identify and resolve clock synchronisation errors and determine whether they are material, but no corrections were processed.</p> <p>The impact is low because two clock adjustments may have resulted in small volumes being recorded in an incorrect period.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Same ICP's and issue as above in 8.4</p> <p>Clock Sync issues like this are evaluated and corrected where there is a measurable shift in volume between intervals as a result of the timesync issue. In both cases the volume shift would have resulted in $< 1\text{kwh}$ variance per interval due to the flat load and extremely low volumes of these ICP.</p>	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
FOGY will continue to monitor Meter Events for these timesync errors and request the MEP's to correct where required. And to Estimate where volume shift has a measurable difference	02/08/2024	

Creation of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 18-Dec-23</p> <p>To: 23-Jul-24</p>	<p>I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register.</p> <p>17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023 for ICPs 0000241337WE97B and 0000242779WE6A4.</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 rated as strong because most submission information was accurate. The impact is low based on the number of ICPs affected, and volumes.		
Actions taken to resolve the issue		Completion date	Remedial action status
I flow volumes will be estimated until such time as the meter is reconfigured and included in revisions		30/09/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Process will be added to ensure any ICP flagged as B where no EG register is available yet will be Estimated and included in revisions until such time as the metering can be resolved. Expectations are still that Metering will be updated based on connection of Solar being approved by the Network and appropriate paperwork completed		30/09/2024	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 18-Dec-23 To: 23-Jul-24	<p>I flow volumes are not quantified according to the code for ICP 0030326030PCC5C since generation commenced in December 2023, and the ICP has not been added to the gifting register.</p> <p>17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023.</p> <p>Two clock synchronisation events over 1800 seconds did not have trading period data estimated to ensure that it was spread across the affected periods. IntelliHUB estimated data not replaced with actual data unless the actual data is obtained within the catch-up window of 15 days of the estimate.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because most submission information was accurate. The impact is low based on the number of ICPs affected, and volumes.	
Actions taken to resolve the issue		Completion date
See comments in per previous sections with these same ICP's and Issues		02/08/2024
Preventative actions taken to ensure no further issues will occur		Completion date
See comments in per previous sections with these same ICP's and Issues		02/08/2024
		Investigating

Reconciliation participants to prepare information		
Non-compliance	Description	
<p>Audit Ref: 12.9</p> <p>With: Clause 2 of schedule 15.3</p> <p>From: 18-Dec-23 To: 23-Jul-24</p>	<p>17.664 kWh of unmetered load was not reported for submission between 2 February 2023 and 4 April 2023.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong because most submission information was complete, accurate and correctly aggregated. The isolated exception occurred due to the network unexpectedly adding shared unmetered load to FOGY ICPs.</p> <p>The impact is low based on the number of ICPs affected, and the unreported volume.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
As mentioned in previous sections, volume for the 2 months it took to offboard the 2 ICP's would have been within the daily rounding for HHR settlement.	02/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>FOGY does not accept ICP's with Unmetered load, and the addition of this shared unmetered load after the ICP's were with FOGY triggered the need to have these customers switch out to a retailer that does NHH reconciliation.</p> <p>FOGY will continue to monitor for this type of rare event and account for volume where this is possible</p>	02/08/2024	