

Compliance plan for Pioneer Energy

Non-compliance	Description	
Audit Ref: 3.3 With: clause 10 of Schedule 11.1 From/to: 26/1/17 – 12/05/17	Update for 30 ICPs out of 35 were uploaded later than 5 business days (clause 10 of Schedule 11.1). The majority of these updates were late updates of profile for UNM reconciled ICPs Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Late correction of profile in the registry was caused by an issue with Orion. The error was noted and information corrected no later than 28 business days. No impact on market settlement because the error was corrected quickly and revised reconciliation files were sent.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The Orion system was initially hardcoding all NHH ICPs to RPS which was then subsequently updating the registry. This was issue identified by Pioneer and Pioneer subsequently manually adjusted the registry to reflect the correct profile code before month end to ensure the reconciliation files reflected the correct profiles. Agility has now corrected the coding in Orion so that the correct profile code is reflected in both the registry and Orion and manual intervention is no longer required.	31 May 2017]	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Pioneer will monitor any non RPS profiled NHH sites to ensure correct profile is reflected in registry upon switching process This is incorporated within the process documents and also within the monthly ICP Switches Google document which identifies all ICPs switching to PION during a given month.	Ongoing	

Non-compliance	Description	
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1 From/to: 15/01/17 – 29/05/17	ANZSIC code for 8 ICPs out of 1,283 was incorrect (clause 9(1)(k) of Schedule 11.1) Potential impact None Actual impact: None Audit history: none Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Incorrect ANZSIC code was entered for 8 ICPs. This has a minor, negligible impact on settlement outcomes	
Actions taken to resolve the issue	Completion date	Remedial action Status
All ANZSIC codes have been corrected in the Registry – incorrect ANZSIC codes were inherited from previous retailer but have subsequently been corrected by PION.	27 June 2017	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Process has been developed to ensure that on switching of new ICPs ANSIC codes are reviewed and corrected/updated where appropriate.	Completed 27 June 2017	

Non-compliance	Description	
Audit Ref: 4.1 With: 2 of Schedule 11.3 From/to:23/01/17 -24/4/17	29 ICPs TR switch were backdated – NT files Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Pioneer Energy just finalized the transfer of about 1,600 ICPs from another company. NT files for small number of standard switches were sent outside of 2 business days. Impact on settlement market and customers was minimal.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Process for switching in Orion is now automated and Pioneer's new process incorporates daily review of the switching exception report.	31 May 2017	Identified - Pioneer provided updated document – Set up a new customer, switching time frames are included
Preventative actions taken to ensure no further issues will occur	Completion date	
Daily review of switching exception report to ensure switching timeframes are adhered to	Ongoing	

Non-compliance	Description		
Audit Ref: 4.4 With: 5 of Schedule 11.3 From/to:31/3/17 – 31/3/17	For 1 ICP information contained in CS file was incorrect (the date of switch event read was the same as an event date); clause 5 of Schedule 11.3 Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit Risk Rating	Rationale for audit risk rating		
Low	No impact on settlement outcomes, it was just one CS file. Pioneer Energy will do more testing going forwards		
Actions taken to resolve the issue		Completion date	Remedial action Status
The root cause of this isolated case has not yet been established with Agility, however further checking of other CS files has not shown the issue to be replicated.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
SPOT check periodically of the CS files to ensure details are as expected		Ongoing	

Non-compliance	Description		
Audit Ref: 4.8 With: 9 of Schedule 11.3 From/to:24/4/17 – 15/5/17s	For 2 ICPs out of 24, incorrect type of switch was specified. It should have been TR not MI. Clause 9 of Schedule 11.3 Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit Risk Rating	Rationale for audit risk rating		
Low	Type of switch was identified incorrectly only for 2 ICPs of 24. It was in the early stages of Pioneer operation, when workload was high.		
Actions taken to resolve the issue		Completion date	Remedial action Status
Training has been provided to staff involved in switching operations emphasising the importance of ensuring the correct switch type is used. A check list has been established to be completed for each switch including the switch type		31 May 2017	Identified - - Pioneer provided updated document "Internal Supply Application, which includes requirement to assign correct switch type
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		31 May 2017	

Non-compliance	Description	
Audit Ref: 4.11 With: 11 of Schedule 11.3 From/to: 31/3/17 - 4/5/17	Final information for 4 ICPs was sent to the gaining traders later than 3 business days. The range of dates was between 4 and 8. Clause 11 of Schedule 11.3 Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	There was no impact on settlement market and customers. Information was only late by a few days.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The workload in the initial months of Pioneer becoming a tier 1 retailer and the transferring of a large number of ICPs from SELS to PION in such a short timeframe will not be repeated and these issues are not expected to occur again. Staff are aware of the timing requirements and process documents reflect these. Also the registry Switch Breach report is reviewed on a daily basis which will highlight actions required so breaches do not occur.	31 May 2017	Identified - Pioneer provided updated document – Set up a new customer, switching time frames are included
Preventative actions taken to ensure no further issues will occur	Completion date	
Process documents reflect the timings required and staff are fully trained in this area. Daily review of Switch Breach report will also highlight actions required so breaches do not occur.	31 May 2017	
Preventative actions taken to ensure no further issues will occur	Completion date	

Non-compliance	Description	
Audit Ref: 4.15 With: 16 of Schedule 11.3 From/to: :7/3/17 - 2/5/17	6 Switches (HH) out of 155 were finalised later than 3 business days by Pioneer, Clause 6 of Schedule 11.3. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit Risk Rating	Rationale for audit risk rating	
Low	Very small number of switches finalised outside of the Code requirement. No impact on settlement market and customers.	
Actions taken to resolve the issue	Completion date	Remedial action Status
The workload in the initial months of Pioneer becoming a tier 1 retailer and the transferring a large number of ICPs from SELS to PION in such a short timeframe will not be repeated and these issues are not expected to occur again. Staff are aware of the timing requirements and process documents reflect these.	31 May 2017	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Process documents reflect the timings required and staff are fully trained in this area.	31 May 2017	

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7 of Part 15 From/to: 1/217- 6/5/17	In AV120, Orion provided aggregated volumes per invoice month, but a reconciliation month within a file refers to month when volumes were supplied. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating:3		
Audit Risk Rating	Rationale for audit risk rating		
Low	There is no risk to the market created by Pioneer by assigning supplied volumes to the wrong month in files provided to the reconciliation manager. The calculations are correct but there is an issue how Orion's code is written. It should not be difficult to fix it.		
Actions taken to resolve the issue	Completion date	Remedial action Status	
Agility have corrected the coding for the AV-120 report so that the month presented is the month the actual invoice was generated. Previously the month presented was the consumption month. This is being tested and will be in production for the next reconciliation file submissions. Previously incorrect files will be adjusted through the standard revision wash-up process. There was initial miss-understanding around whether the volumes reported in the AV-120 should be consumption month or invoiced month, with Pioneer trusting the initial Orion set-up as being compliant, this has since been rectified	5 July 2017	Cleared	
Preventative actions taken to ensure no further issues will occur	Completion date		
Thorough testing of the corrected coding to Orion has been completed and results confirmed with Pioneers auditor (Ewa) as sign-off that the reports performing compliantly.	5 July 2017		
Preventative actions taken to ensure no further issues will occur	Completion date		

Non-compliance	Description	
Audit Ref: 12.3/12.9 With: 15.5 of Part 15 & 2 of Schedule 15.3 From/to 1/2/2017 – 6/5/2017	<p>NHH volumes created for UML ICPs are not correctly calculated by Orion because it applies a shape profile to calculated UML volumes. Correct process is to take the number of days for each ICP and multiply it by the "Daily kWh" recorded in the registry and record it as historic estimates."</p> <p>Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3</p>	
Audit Risk Rating	Rationale for audit risk rating	
Low	Audit risk is defined as low because small volumes of UML are affected, total daily kWh for all UML ICPs is 30.10 kWh. Shape file, in May, change volume by 1.52 kWh.	
Actions taken to resolve the issue	Completion date	Remedial action Status
Agility are in the process of correcting the software coding in Orion so that the AV-080 UML volumes are calculated correctly by not applying a shape profile. This will be in place for the next month reconciliation files and the very small volume differences will be corrected through the standard revision wash-up process	5 July 2017	Cleared, Pioneer provided examples of UML calculation
Preventative actions taken to ensure no further issues will occur	Completion date	
Thorough testing of the corrected coding to Orion will be completed and results confirmed with Pioneers auditor (Ewa) as sign-off that the reports performing compliantly.	5 July 2017	
Preventative actions taken to ensure no further issues will occur	Completion date	