

Compliance plan for Supercharged Energy - 2019

Non-compliance	Description		
Audit Ref: 1.11 With: 15.37A From: 27-Feb-19 To: 29-Mar-19	Audit report completed late Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor		
Actions taken to resolve the issue		Completion date	Remedial action status
Creation of a shared business calendar with important due dates highlighted.		25/02/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Future Audit due dates will now be placed in the business calendar. Reminders will be set eight weeks beforehand to book an audit in good time.		-	

Non-compliance	Description	
Audit Ref: 1.12 With: 16A.11(1) From: 01-Nov-18 To: 28-Mar-19	Material change audit not conducted 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 audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor. The company uses the registry interface, which is reliable, and JC Consulting provides support services if any difficulties arise.	
Actions taken to resolve the issue	Completion date	Remedial action status
Transition and training of switching functionality has been a gradual process, and was discussed at the previous audit. It would not be possible to conduct a material change audit until after the transition and training had been completed, and by then those functions were being audited in the normal audit		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	

Non-compliance	Description		
Audit Ref: 2.2 With: 15.35 From: 01-Nov-18 To: 28-Mar-19	Submission files in October'18 and February'19 were submitted late 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 recorded as moderate because non-compliance identified in this section was caused by a disagreement between SUPE and their contractor. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication and planning between SUPE and contractor. Contractor controls for complying with file submission deadlines are strong.			

Non-compliance	Description		
Audit Ref: 2.13 With: 10.36 From: 01-Sep-18 To: 28-Mar-19	No arrangements for 71 ICPs with MEPs 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 audit risk rating is recorded as low because a number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
We dispute this as we do currently have an arrangement with all MEPs. The arrangement is that we will switch out their meters as soon as practical after we have taken over the ICP. In the meantime we pay their regular metering charges when they send us an invoice. Most of the remaining 44 ICPs are on the TASM network and are awaiting network approval before new meters can be installed.			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Network Tasman have slowed this process by incorrectly linking the meter change process to the solar approval process, which should be treated as two separate processes. This has been raised with Network Tasman. Had the Network allowed us to install our meters following the SR requests to the MEP we believe we would have avoided this breach.			

Non-compliance	Description	
Audit Ref: 3.3 With: 10 of Schedule 11.1 From: 01-Sep-18 To: 28-Mar-19	68.5% of trader updates are recorded later than 5BD Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating:2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate because there are some improvements that can be made to them. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Updates to the registry are made within 5 days of SUPE being notified (either by the registry or by paperwork) by the MEP. It is unfair and inappropriate to calculate the time delay from the actual meter work completion.		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	

Non-compliance	Description		
Audit Ref: 3.9 With: 19 of Schedule 11.1 From: 01-Sep-18 To: 28-Mar-19	Incorrect "inactive" status was assigned to one ICP for 87 days 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 rated as moderate because there are some improvements that can be made to them. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ICP in question was updated to active effective the retailer start date immediately consumption was detected, the delay was due to difficulties obtaining reads, but the read received was still within the four-month period. We believe our system acted appropriately given the information that was available			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 4.2 With: 3 of Schedule 11.3 From: 28-Dec-18 To: 31-Dec-18	One AN file late Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. SUPE monitors a switch breach report provided by the registry. As soon as they received a NT notification, AN response is sent. Lateness of one AN file happened over Christmas period. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor if any.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Clearer switching responsibilities have been set when switching manager is on leave.		15/01/2019	

Non-compliance	Description		
Audit Ref: 4.3 With: 5 of Schedule 11.3 From: 01-Sep-18 To: 24-Mar-19	15 CS files were sent late 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 recorded as moderate as they require some adjustment .A new process has been written, the next audit will assess how well it is followed. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff training, however, it must be noted that we were basing our actions on the switch breach report from the registry, which (we now know) does not accurately reflect the updated rules.			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We recommend that the EA correct the registry breach reporting. Until this is completed, we will process losing retailer switches within the correct business day windows. New process written 27/03/2019.		27/03/2019	

Non-compliance	Description		
Audit Ref: 4.8 With: 10(1) of Schedule 11.3 From: 01-Sep-18 To: 24-Mar-19	3 CS files were sent late 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 recorded as moderate as they require some adjustment. A new process has been written, the next audit will assess how well it is followed. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff training, however it must be noted that we were basing our actions on the switch breach report from the registry, which (we now know) does not accurately reflect the updated rules.			Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We recommend that the EA correct the registry breach reporting. Until this is completed, we will process losing retailer switches within the correct business day windows. New process written 27/03/2019.		27/03/2019	

Non-compliance	Description	
Audit Ref: 4.15 With: 17 of Schedule 11.3 From: 01-Sep-18 To: 24-Mar-19	Some NW files were sent late, and some NW had incorrect withdrawal code used Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as weak . SUPE does not have a good understanding of how the withdrawal process works. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Staff training carried out to educate about proper use of NW files.	26/03/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Withdrawal process documentation updated to include comprehensive cover of regulations 03/04/2019	03/04/2019	

Non-compliance	Description		
Audit Ref: 6.1 With: 15.13 From: 01-Dec-18 To: 28-Mar-19	Embedded generation for 0006152147RND57 is not being submitted or gifted 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 recorded as moderate as they require some improvement. The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Meter change now completed 28/03/2019.		28/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meter change processes are being moved back to NZ so there is more accountability and oversight in the meter change process. This will therefore speed up network approval and the meter change process.			

Non-compliance	Description		
Audit Ref: 6.10 With: 9 (1) of Schedule 15.2 From: 01-Oct-18 To: 31-Dec-18	The read attainment requirements were not met for 3 consecutive months 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 audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
WELLS has been contracted to read meters manually, and a procedure is in place to follow up on late reads.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
Audit Ref: 11.2 With: 15.6 From: 01-Nov-18 To: 07-Feb-19	Submission files in November'18 and February '19 were submitted one day late 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 recorded as moderate because the non-compliance identified in this section was caused by a disagreement between SUPE and their contractor. The audit risk rating is recorded as moderate. The number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication and planning between SUPE and contractor. Contractor controls for complying with file submission deadlines are strong.			

Non-compliance	Description		
Audit Ref: 11.3 With: 15.7 From: 01-Nov-18 To: 28-Mar-19	Submission files in October'18 and February'19 were submitted late 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 recorded as moderate because the non-compliance identified in this section was caused by a disagreement between SUPE and their contractor. The audit risk rating is recorded as moderate. The number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication and planning between SUPE and contractor. Contractor controls for complying with file submission deadlines are strong.			

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Feb-19 To: 07-Feb-19	Submission files were submitted late in February'19. HHRAGGR files do not contain electricity supplied information 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 recorded as moderate because the non-compliance identified in this section was caused by a disagreement between SUPE and their contractor. Supercharged Energy submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication and planning between SUPE and contractor. Contractor controls for complying with file submission deadlines are strong.			

v	Description		
Audit Ref: 12.2 With: 15.4 From: 01-Nov-18 To: 07-Feb-19	Submission files in November'18 and February '19 were submitted one day late 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 recorded as moderate because the non-compliance identified in this section was caused by a disagreement between SUPE and their contractor. The audit risk rating is recorded as moderate. The number of ICPs traded by Supercharged Energy is small therefore any impact to the market will be minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better communication and planning between SUPE and contractor. Contractor controls for complying with file submission deadlines are strong.			

Non-compliance	Description	
Audit Ref: 13.3 With: 10 of Schedule 15.3 From: 01-Feb-19 To: 07-Feb-19	The proportion of historical estimates in submission information for 4 months has not achieved the target of 80% 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 recorded as moderate as they require some adjustment . The audit risk rating is recorded as low because the number of ICPs traded by Supercharged Energy small therefore any impact to the market will be minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
These were due to a single ICP that was read within the four-month period.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No action is possible.		