

## COMPLIANCE PLAN FOR PIONEER ENERGY- 2019

Non-compliance	Description	
Audit Ref: 2.1 With: 11.2 & 15.2 From: 16-Mar-18 To: 15-Feb-19	Incorrect or missing information for a small number of ICPs Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. The amount of inaccurate information in the registry is low. The audit risk rating is low because the impact on the settlement outcome is minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
B or G installation type, but no corresponding injection meter: Pioneer Energy has liaised with the Customer and local networks to gain further information. The generation on site provides back-up supply in case of grid outage. Generation is not exported to the grid and therefore a regular meter is sufficient.	May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
New customer processes are in place and documented in Promapp to communicate with new customers to gain and confirm information relating to ANZSIC codes, onsite generation and UML details.	May 2019	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 2.2 With: 15.35 From: 16-Mar-18 To: 15-Feb-19	Two breaches recorded in relation to inaccurate submissions Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. The amount of inaccurate information in the registry is low. The audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
The first was inaccurate volume on one ICP, which was corrected within an hour of identification of the RM The second was deemed a no breach as Pioneer had relied on information in the registry.		July 2018 Feb 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Documented processes are in place for the checking of submission files prior to submission including assessing volume and number of ICP discrepancies and amending prior to submission. We are in the process of building system capability to enable automated checking and exception reporting to decrease the reliance on manual processes		May 2019 May 2020	

Non-compliance	Description	
Audit Ref: 3.3 With: 10 of Schedule 11.1  From: 16-May-17 To: 15-Mar-18	Delayed updates to ICPs “active” status (34.3%), late trader’s updates to registry (12.8%)  Potential impact: Low  Actual impact: Low  Audit history: Once previously  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. Backdating status changes have a minor impact on settlement outcomes because usually it happens within the same reconciliation month. Audit Risk Rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Electrically disconnected ready for decommissioning – back dating of entries comprised a number of unique instances; Meter reader discovery of BTS to permanent supply during switch process, Demolition of buildings and removal/changing of meters by customers without PION involvement.	May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Delays identified have been due to late notification by electricians and MEPs. Increased follow up and chasing of relevant parties	Ongoing	

Non-compliance	Description		
Audit Ref: 3.5 With: 9 of Schedule 11.1  From: 16-Mar-18 To: 15-Feb-19	Registry information not updates within 5 business days of the event for a small number of ICPs  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	The controls are rated as moderate because there are some improvements that can be made to them. The amount of inaccurate information in the registry is low. The audit risk rating is low because the impact on the settlement outcome is 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	
Delays identified have been due to late notification by electricians and MEPs. Increased follow up and chasing of relevant parties		Ongoing	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 3.6 With: 9(1)(k) of Schedule 11.1  From: 16-Mar-18 To: 15-Feb-19	Incorrect ANZSIC code for six ICPs Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. The amount of inaccurate information in the registry is low. The audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
ANZSIC codes updated for the six legacy ICP identified		May 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
ANZSIC codes are assessed as part of the customer onboarding process. A n assessment of ANZSIC codes for existing customers has been undertaken (see 3.3 audit commentary above)		May 2019	

Non-compliance	Description		
Audit Ref: 3.7 With: 9(1)(f) of Schedule 11.1  From: 01-Feb-19 To: 15-Feb-19	Incorrect information in "Daily Unmetered kWh" field for standard and distributed unmetered load  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. The amount of inaccurate information in the registry is low. The audit risk rating is low because the impact on the settlement outcome is minor.		
Actions taken to resolve the issue	Completion date	Remedial action status	
UML in the Registry has been corrected for the ICP detailed	May 2019	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
PION will look to amend the process for ICP 000950091WP5EB and 0000950092WP92B			

Non-compliance	Description				
<p>Audit Ref: 3.8 With: 17 of Schedule 11.1</p> <p>From: 16-Mar-18 To: 15-Feb-19</p>	<p>A number of ICPs have incorrectly assigned “inactive” status when they should be “active”</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate Breach risk rating: 2</p>				
Audit risk rating	Rationale for audit risk rating				
<b>Low</b>	<p>The controls are rated as moderate because there are some improvements that can be made to them to achieve compliance. The process needs to be refined. Audit risk ratings is low, minor impact on settlement outcomes.</p>				
Actions taken to resolve the issue	Completion date	Remedial action status			
Dates corrected as per paperwork provided form MEP	Ongoing	Identified			
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: 16-Mar-18 To: 15-Feb-19	The status "Inactive- Reconciled elsewhere"(1,5) incorrectly assigned to 158 ICPs  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Weak  Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as weak. It was overlooked when Pioneer Energy stopped trading all ICPs on the embedded networks. The audit risk rating is low because there is no impact on settlement outcomes, volumes are submitted correctly.	
Actions taken to resolve the issue	Completion date	Remedial action status
ICP will be changed to "active" as at 1 July 2018 when PION ceased to be sole trader of this embedded network	June 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Unique instance of an embedded network change from single retailer to multiple retailers		



Non-compliance	Description				
Audit Ref: 4.2 With: 4 of Schedule 11.3  From: 01-Nov-18 To: 16-Nov-17	The event date nominated by PION was up to 12 business days before the date of receipt of notification for 65 ICPs (ex PLEL)  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1				
Audit risk rating	Rationale for audit risk rating				
<b>Low</b>	The controls are rated as strong. It was exceptional situation to specify a date in the past to accommodate PLEL customers. Audit risk rating is low because the impact on the settlement outcome is minor.				
Actions taken to resolve the issue	Completion date	Remedial action status			
Delayed switch notifications for 65 (ex PLEL customers) was done in the best interests of customers who wished to use different retailer after their PLEL relationship ceased but had automatically been transferred to PION.	Oct 2018	Identified			
Preventative actions taken to ensure no further issues will occur	Completion date				
One off event resulting from PLEL default					

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 4.4 With: 6A of Schedule 11.3  From: 16-Mar-18 To: 15-Feb-19	One RR file late Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as strong. There was only one RR file late due to difficulty in getting a read. Audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This was a one-off incident. There was difficulty in establishing an actual read as the meter was programmed to display one value but actually had two channels. Once actual read was established PION found the difference in value to the CS read was significant enough to request a late RR.			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
No further actions taken as one-off event.			

<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 4.8</p> <p>With: 10(1) of Schedule 11.3</p> <p>From: 16-Mar-18</p> <p>To: 15-Feb-19</p>	<p>Final information for 33 ICPs was provided to the registry later than 5 BD</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>The controls are rated as moderate because there are some improvements that can be made to them. Switching process for move in needs to be updated. Audit risk rating is low because the impact on the settlement outcome is minor.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>Switch breach table was being used as a measure to monitor breaches, this report allocates 10 days to finalise switch. Use of this report has been discontinued for monitoring.</p>		May 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
<p>Automated PR040 – RSSWBRCURD daily report delivery set up. This is being monitored daily to prevent any late files</p>		Ongoing	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 4.14 With: 16 of Schedule 11.3  From: 16-Mar-18 To: 15-Feb-19	Switching for four ICPs was finalized late Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as moderate because there are some improvements that can be made to them. The amount of inaccurate information in the registry is low. The audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
System issue affecting the generation of the CS file causing some delay as it required manual completion. System operator has been notified off the problem and is currently working on a solution. Switch breach table was being used as a measure to monitor breaches, this report allocates 10 days to finalise switch. Use of this report has been discontinued for monitoring.		May 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Automated PRO40 – RSSWBRCURD daily report delivery set up. This is being monitored daily to prevent any late files		May 2019	

Non-compliance	Description		
<p>Audit Ref: 5.4</p> <p>With: 11(1)(2)(c)(d)(2A) of Schedule 15.3</p> <p>From: 01-Feb-19</p> <p>To: 31-Mar-19</p>	<p>The Grey District Council database does not meet all requirements</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><b>Low</b></p>	<p>The controls are rated as moderate. DUML database does not meet all requirements. It switched to PION quite recently. Audit risk ratings is low because impact on settlement outcomes is minor. A new audit will be conducted in May'19.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Database obtained from Grey District Council. It contains information of the load and location of the streetlights, load information sent to EMS to profile using DST and submit NHHVOLS to RM</p>		<p>April 2019</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Database to be re-audited for compliance in May 2019</p> <p>Electronet will provide PION with the Database monthly to capture updates to load during LED roll-out.</p>		<p>June 2019</p> <p>Ongoing</p>	

Non-compliance	Description	
Audit Ref: 6.1 With: 10.24 (c)  From: 30-Sep-18 To: 31-Mar-19	Subtraction is used to determine submission information for 1002050361LC60D  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong. Incorrect design of the metering installation for 11 kV supply Auckland Hospital resulted in double submission of volumes. Action of the MEP put Pioneer in a non-compliant situation. Audit risk rating is low because there is no impact on settlement outcomes.	
Actions taken to resolve the issue	Completion date	Remedial action status
As described above - Worked with AMS and onsite parties to correct technical set-up. Adjustment of reconciliation files to provide accurate information.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
One-off incident		

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 6.9 With: 8(1)of Schedule 15.2  From: 01-Aug-18 To: 15-Feb-19	The target of 100% was not achieved for a small number of NSPs Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are recorded as strong. PION has very good monitoring processes in place but for some ICPs Wells has a problem gaining access. Audit risk rating is low because of a small number of ICPs		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
Establishment of a dashboard for monitoring of sites which have not received a read in 2 months (yellow) and 3 months (red). Identified sites are contacted for information relevant to aid meter readers / identify issues and customers are requested to provide photo reads of the meter.	Ongoing	Identified	
BPD1101 was affected by biosecurity measure on farms limiting access.	Completed		
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>		
Proactive monitoring of meter reads	Ongoing		

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 6.10 With: 9(1)of Schedule 15.2  From: 01-Aug-18 To: 15-Feb-19	The target of 90% was not achieved for a small number of NSPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are recorded as strong. PION has very good monitoring processes in place but for some ICPs Wells has a problem gaining access. Audit risk rating is low because of the small number of ICPs		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
BSC0011 and MTM0331 relates to the refurbishment of Bayfair shopping, which commenced in March 2018. Power to the meters was turned off during the refurbishment and access was limited due to site safety requirements.		Aug 2019	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Proactive monitoring of meter reads		Ongoing	



Non-compliance	Description		
Audit Ref: 11.4 With: 15.8  From: 16-Mar-18 To: 15-Feb-19	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Pioneer Energy submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
To be discussed with our HHR data provider, EMS.			Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 12.7 With: 15.12 From: 10-Jan-18 To: 19-Mar-19	Incorrect submission for NSY0331 (Jan'18, rev14) Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are recorded as moderate because there are some improvements that can be made to them. The audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
This has been noted			Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Future submissions, Washup files will be analysed by GXP prior to submission, in addition to current checks.			

<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 12.8 With: 4 of Schedule 15.2  From: 16-Mar-18 To: 15-Feb-19	Permanence of meter reading for the period Apr'17 to Jan'18 not achieved  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are recorded as moderate because there are some improvements that can be made to them. The audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Analyst to identify Historical Estimate discrepancies in the files and manually amend where necessary.		Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Job raised with our software provider to treat UML and closing estimates as Actual reads for historical estimate calculations		Dec 2019	

Non-compliance	Description	
Audit Ref: 12.9 With: 2 of Schedule 15.3  From: 16-Mar-18 To: 15-Feb-19	Incorrect submissions for two UML ICPs and incorrect profile for one ICP.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong. Pioneer's process for the management of NHH reads is robust. Audit risk rating is low because there is no impact on settlement outcomes because of the small number of ICPs with low volumes.	
Actions taken to resolve the issue	Completion date	Remedial action status
Registry amended to RPS PV1 For ICP 0000001945CE5B1	May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ICP 0000606334WPB76 and 0000950800WP644 will be investigated and adjusted	June 2019	

Non-compliance	Description		
Audit Ref: 12.11 With: 4 of Schedule 15.3  From: 16-Mar-18 To: 15-Feb-19	Incorrect calculation of historical estimates for some scenarios conducted by ORION Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are recorded as moderate because there are some improvements that can be made to them. The audit risk rating is low because the impact on the settlement outcome is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Ongoing discussions with software provider			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 16-Mar-18</p> <p>To: 15-Feb-19</p>	<p>Historical estimates target not met for revision 3, and 7 for some NSPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	Controls are recorded as moderate because there are some improvements that can be made to them. The audit risk rating is low because the impact on the settlement outcome is minor.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Pioneer Energy has been working with Orion/Agility to improve the accuracy of the historical estimates, a new report released in July 2018 has significantly improved the calculations.		July 2018	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Further work will be undertaken with Agility/Orion to correct calculation errors		May 2020	
Non-compliant sites will be further investigated and corrected where possible.		Aug 2019	