

Compliance plan for Prime Energy Limited Reconciliation Participant – 2022

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 15.2 From: 01-Sep-21 To: 21-Jul-22	PRME An incorrect profile was not corrected as soon as practicable for ICP 0002279031MLE9F. There was evidence that the profile was incorrect from 1 September 2021, but a correction was not processed until 21 July 2022. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as processes in place identify discrepancies and correct these most of the time, and I only found once instance where data was not corrected as soon as practicable. The impact is low, because the registry has been corrected and revised submission information will be provided through the revision process.	
Actions taken to resolve the issue	Completion date	Remedial action status
The profile has been updated in the registry	21/7/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Errors are inevitable so we are pleased that our validation process this year, trialled & released into production mid of the year identified this. We also identified where things went wrong & are continuously training staff to avoid these errors happening again.	N/A	

Electrical Connection of Point of Connection		
Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 09-Apr-21 To: 28-Jan-22	PRME Two reconnections were not recertified within five business days. One new connection did not have full certification within five business days. Potential impact: Low Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. While there is currently no process to identify uncertified reconnections most uncertified meters are replaced on switch in. The audit risk rating is low as a small proportion of ICPs were affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Although the meters weren't certified within 5 days of the reconnection, they have been certified.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We try to replace all our legacy meters to AMI as part of the switch process. We understand a certain load is required to certify the meter so sometimes it's not easy to certify sites during reconnection if they are vacant. Having a certification process (as recommended by the auditor) will allow us to keep track of any uncertified reconnected meters.	12/2022	

Provision of information on dispute resolution scheme	
Non-compliance	Description
Audit Ref: 2.19 With: Clause 11.30 From: 01-Apr-21 To: 28-Jul-22	PRME and PRMH Information on Utilities Disputes is not always provided when responding to inbound voice calls from customers. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong overall, as information on Utilities Disputes is provided as required under most circumstances.</p> <p>The impact is assessed to be low as information on Utilities Disputes is provided where the customer indicates that they are unhappy or wish to make a complaint. Most phone calls are followed up with an email which includes information on Utilities Disputes in the footer.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We believe we are doing everything right & are keeping our customers well informed about the dispute process.		N/A	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	Prime has interpreted that some inbound telephone calls are not “queries” and therefore information Utilities Disputes does not need to be provided.
We are a small retailer with a handful customers. We don't see a need to inform al our callers about Utilities Disputes (UDL). For example a customer calls who calls every month to make a payment. An electrician calling for a new connection. UDL info is provided to customers who raise concerns or indicate any sort of dissatisfaction. All conversations are confirmed by an email which has UDL info in the footer.		N/A	

Provision of information on electricity plan comparison site	
Non-compliance	Description
<p>Audit Ref: 2.20</p> <p>With: Clause 11.30B</p> <p>From: 01-Apr-21</p> <p>To: 28-Jul-22</p>	<p>PRME</p> <p>Information on Powerswitch is not provided to customers with residential ANZSIC codes:</p> <ul style="list-style-type: none"> • in outbound communications to residential consumers about price and service changes, • to residential consumers on an annual basis, or • in directed outbound communications about the consumer's bill. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	Controls are rated as weak overall, as information on Powerswitch is only available to residential customers on Prime's website and the other requirements of clause 11.30B have not been met.

	The impact is assessed to be low, based on the number of ICPs with residential ANZSIC codes supplied and that information on Powerswitch is available on Prime's website and through Powerswitch advertising campaigns.	
Actions taken to resolve the issue	Completion date	Remedial action status
We rarely sign up residential customers, and our commercials come through consultants who have already explored the market.	N/A	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will ensure any individual residential customer that approaches PRME are always informed about PowerSwitch. PRMH doesn't do new sign-ups	08/2022	

Changes to registry information		
Non-compliance	Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 16-Jun-21 To: 14-Mar-22	PRME Six late status updates. Seven late trader updates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, at least 84% of updates of each type were made on time. Delays were generally caused by late receipt of information to confirm the correct event attributes, and updates contained correct information. The risk is low as most updates were completed on time or soon after they were due.	
Actions taken to resolve the issue	Completion date	Remedial action status
Late paperwork in outside our control. Technically we only had 1 late update from the day we received paperwork.		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
We continuously try to improve our performance but since we have a small number of ICPs, a couple of non-compliances makes a significant impact on the percentage rating.		

Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 10-Dec-21</p> <p>To: 10-Mar-22</p>	<p>PRME</p> <p>ICP status was not updated within five business days of commencement of trading for 21 ICPs.</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>Controls are rated as strong as there are good processes in place to manage the new connection process.</p> <p>The risk rating is low. 19 late updates were made within ten business days of initial electrical connection, and all late updates were made within 34 business days. 20 of the 21 late updates were caused by late receipt of connection paperwork.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
All ICPs have been updated in the Registry. Delays were caused by late paperwork & short staff at the contractors end due to covid. Majority of the new connections were for the same building.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Covid had a huge impact on all the organisations but the small companies like us took a direct hit. The building industry has boomed during this time & late paperwork for 1 site from 1 inspector can make a huge difference on our performance. This noncompliance will probably never go away unless we stop doing new connections. The best we can do is ensure the paperwork is process promptly upon receipt.	08/2022	

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: Clause 9 (1)(k) of Schedule 11.1 From: 26-May-21 To: 30-Nov-20	PRME Five ANZSIC codes were incorrectly recorded, and were corrected during the audit. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. Processes for ANZSIC code validation are in place, but there is an error rate of 5/53 (9%) for the sample checked for PRME. The audit risk rating is low as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Registry has been updated	08/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
ANZSIC codes are corrected during the signup process the Registry is updated during switch ins. However; we discovered this process was missed during the move in process so we are training all our staff to ensure ANZSIC codes are confirmed with the customers during signups & the Registry is updated accordingly. We will also carry out random checks to see if the process is being followed.	10/2022	

Losing trader response to switch request and event dates - standard switch	
Non-compliance	Description
Audit Ref: 4.2 With: Clause 3 Schedule 11.3 From: 05-Jul-21 To: 06-Jul-21	PRME One AN file sent one day late. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	The ccontrols are strong, because ANs due are monitored daily. The impact is low because one file was sent one business day late.		
Actions taken to resolve the issue		Completion date	Remedial action status
I believe we have done really well having just 1 late AN given that we try & confirm switchouts to avoid unauthorised switch outs resulting in customer complaints.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We had just 1 late AN which was caused by staff shortage so I can't really dwell on it too much. We are aiming for 0 non-compliance in this area for our next audit.			

Withdrawal of switch requests			
Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 09-Nov-21 To: 12-May-22	PRME 0003727035WFB63 NW-1053363 had the DF (date failed) code applied where the requested transfer date was not greater than ten business days in the future. One late switch withdrawal. Potential impact: None Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	PRME has robust controls in place for withdrawals. The impact is low because one NW advisory code was found to be incorrect, and one NW was late. Only one NW was issued with the DF code.		
Actions taken to resolve the issue		Completion date	Remedial action status
There isn't any correct response code for incorrect date. No matter what code we had used, it would be a technical non-compliance.			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
DF should be used for incorrect date & not to measure how many switches had transfer date greater than ten business			

<p>days. The NW response code should provide the actual reason for the withdrawal, not just the number of days. There is no correct code for incorrect date. Reasons why we couldn't use other codes:</p> <p>CX: customer is not requesting to cancel the switch</p> <p>CE: customer didn't make the error</p> <p>WP: its not wrong property</p> <p>MI: no metering issues</p> <p>UA: its not an unauthorised switch</p> <p>So doesn't matter which code we use for incorrect date, it would have been a non-compliance.</p>		
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Distributed unmetered load		
Non-compliance	Description	
<p>Audit Ref: 5.4</p> <p>With: Clause 11 of schedule 15.3</p> <p>From: 01-Jun-21</p> <p>To: 30-Jun-22</p>	<p>PRME AKLBBD database</p> <p>One additional item of load identified in the field, resulting in a potential under submission of 1,357.8 kWh per annum.</p> <p>The database audit trails do not specify the user who made the change.</p> <p>The audit report was submitted late.</p> <p>PRME CKHK WLGBBD database</p> <p>A very minor estimated variance of 862 kWh over submission per annum between the kWh submitted and those calculated from the database.</p> <p>The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 1,951 kWh per annum.</p> <p>The database audit trails do not specify the user who made the change.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the change management process requires review. The impact is assessed to be low, based on the kWh values.	
Actions taken to resolve the issue	Completion date	Remedial action status
The database has been updated to include the additional sign & the Registry was updated accordingly. Customer has confirmed	08/2022	Identified

<p>the new sign was added this year as part of the airport revamp project, so the impact is even lower than stated above.</p> <p>Audit trail of the person making the change & it has been noted in the DUML audit as well.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The audit has been submitted & we did request extra time from EA due to covid. We promised the DUML audit would be submitted with this audit & it has been submitted. The DUML has a full explanation about our plans to ensure we capture the changes quickly.</p>	ongoing	

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) Schedule 15.2</p> <p>From: 01-Apr-21</p> <p>To: 31-Mar-22</p>	<p>PRME</p> <p>The meter reading frequency reports provided to the Authority contained some inaccurate information.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 rated as moderate as a small number of exceptions were identified. The report is relied on to determine compliance with the meter reading requirements, and the impact is assessed to be low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We cannot change the report that's submitted already. However, we are looking into the cause & trying to resolve this.</p>		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Its very likely that the report is not referring to the correct date field, may be because the RESP end date field was added later on. In the meantime, we will try to manually validate the data before submitting the report to EA.</p>	09/2022	

NHH meters 90% read rate			
Non-compliance		Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Dec-21 To: 31-Mar-22		PRME Evidence that the best endeavours requirements were met was not provided for ICP 0000039029NTEE6. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as strong because good processes are in place and only one exception was identified. The impact is low because the access issues were resolved by June 2022 and readings are being received.	
Actions taken to resolve the issue		Completion date	Remedial action status
0000039029NTEE6 Actual Read was obtained in Dec 21 & then regular actuals since Jun 22		06/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We always call, email, carry out site visits to resolve AXS issues & obtain actual reads. But it has been tough during covid especially when Wells decided not to read any meters located inside buildings. This site being a residential care facility was high risk and the meter reader wasn't allowed access. This was a temporary access issue. MR notes: Access Blocked - covid red		06/2022	

Meter data used to derive volume information	
Non-compliance	Description
Audit Ref: 9.3 With: Clause 3(5) of schedule 15.2 From: 01-Dec-19 To: 28-Jul-22	PRME Raw AMI meter readings are rounded upon loading into Orion and not when volume information is created. Potential impact: Low Actual impact: Low Audit history: Once Controls: None Breach risk rating: 5

Audit risk rating	Rationale for audit risk rating		
Low	<p>There are no controls to prevent rounding of raw meter data, the system is designed to round as soon as the data arrives.</p> <p>There is very little impact because no metered consumption information is “missing”, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The reads are rounded in Orion but since we don't do profiled/HHR submissions, this has a very low impact.			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We have looked into the cost of increasing the decimals & with the increasing energy pricing at the moment, its not feasible. We are still exploring the possibilities of a new system all together.		12/2023 - 2024	

Calculation of ICP days			
Non-compliance	Description		
<p>Audit Ref: 11.2</p> <p>With: Clause 15.6</p> <p>From: Jan 21-Feb 21 r3, Nov 20 r14, and Jan 21-Mar 21 r14</p>	<p>PRME</p> <p>Zero lines were not inserted into the AV110 for TENC-TSS0011 for January 2021 r3 and February 2021 r3.</p> <p>Zero lines were not inserted into the AV110 for CIAL-CIAL0112 for November 2020 r14, January 2021 r14, February 2021 r14 and March 2021 r14.</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>Controls are now rated as strong because there is a process to identify rows present in previous submissions but not the current revision and add zero rows.</p> <p>The impact is assessed to be low, as zeroing has consistently occurred for the AV080 NHH volumes submissions and where possible revised ICP days will be washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Due to a role change, a different staff took over Recon processes in Dec2021-Jan 2022. The AV-110 zeroing was missed during handover. Zeroing process resumed couple of months ago		06/2022	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
All submissions files are compared with previous submissions files & an exceptions are cleared prior to submission.	06/2022

Accuracy of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: Jan 21-Feb 21 r3, Nov 20 r14, and Jan 21-Mar 21 r14</p>	<p>PRME</p> <p>Zero lines were not inserted into the AV110 for TENC-TSS0011 for January 2021 r3 and February 2021 r3.</p> <p>Zero lines were not inserted into the AV110 for CIAL-CIAL0112 for November 2020 r14, January 2021 r14, February 2021 r14 and March 2021 r14.</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>Controls are now rated as strong because there is a process to identify rows present in previous submissions but not the current revision and add zero rows.</p> <p>The impact is assessed to be low, as zeroing has consistently occurred for the AV080 NHH volumes submissions and where possible revised ICP days will be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Due to a role change, a different staff took over Recon processes in Dec2021-Jan 2022. The AV-110 zeroing was missed during handover. Zeroing process resumed couple of months ago	06/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All submissions files are compared with previous submissions files & an exceptions are cleared prior to submission.	06/2022	

Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: Clause 4 Schedule 15.2</p> <p>From/to: 20-Nov-22</p>	<p>PRME</p> <p>Not all estimated reads were replaced by permanent estimates for the November 2020 r14.</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 strong, this was an isolated issue which occurred due to an issue when handing over the process which was promptly resolved.</p> <p>The impact is low because the forward estimate was 1,245.19 kWh across three ICPs, and the issue has been resolved.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have resumed historic estimates in the system.	12/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This was a 1 off instance where staff missed the permanent but realised it & resumed the task for other upcoming r14 revisions.	12/2021	

Reporting resolution		
Non-compliance	Description	
<p>Audit Ref: 13.2</p> <p>With: Clause 9 Schedule 15.3</p> <p>From: 01-Sep-21</p> <p>To: 30-Apr-22</p>	<p>PRME</p> <p>Some AV080 total and historic estimates were rounded to more than two decimal places.</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 rated as moderate because five of the ten submissions checked contained some rows rounded to more than two decimal places. The impact is low because the files were accepted by the reconciliation manager's system.</p>	

Actions taken to resolve the issue	Completion date	Remedial action status
We are checking the final submission files for rounding & manually updating this to 2 decimal places (if required).	08/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are investigating to see where the rounding is failing & will propose a script change to include rounding to 2 decimal places	04/2023	

Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: Nov-20 (r14), Jul-Sep-21 (r7) and Oct-Dec-21 (r3)</p>	<p>PRME</p> <p>Historic estimate thresholds were not met for some revisions.</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	The controls are rated as strong, as read attainment processes are in place and permanent estimate reads are now consistently entered by revision 14. The impact is assessed to be low as effect on reconciliation is expected to be low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have resumed permanent estimates in the system.	12/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This was a 1 off instance where staff missed the permanent but realised it & resumed the task for other upcoming r14 revisions.	12/2021	