

Compliance plan for energyclubnz

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 2.1 With: 11.2 From: 19-Jun-17 To: 06-Oct-17 | Incorrect reading in RR file sent to a losing trader 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. There was no impact on settlement outcome. It was only one ICP and the losing trader accepted the reading. The audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Losing retailer accepted the reading; changes to process and systems have been implemented to ensure the risk of reoccurrence is minimised. | | October 2017 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| The previous process of submitting RR readings was based on manually putting together the file based on looking up reads from meter read files and was very prone to human error. The new process is completed within the Engage billing system, and uses the index read data shown in the billing system and is therefore much less prone to human error. The system solution was adopted in October 2017. | | October 2017 | |

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| Audit Ref: 2.2 With: 15.35 From: 19-Jun-17 To: 06-Oct-17 | 2 files were uploaded to the RM portal late in Sep'17 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. There was no impact on settlement because files were submitted on the 4 th day but after 1600 hour. The audit risk rating is recorded as low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Files were submitted as soon as checks were completed. | | September 2017 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| The previous process for producing, checking and submitting RM files commenced roughly an hour before they were due – which meant that if there were any issues with the files (as they were for this submission); the entire process would be delayed. The new process has the team running the files at the start of Day 4 or Day 13 (8am) with a view to check and submit the files by midday. This process allows sufficient time to manage all checks and balances. | | October 2017 | |

| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| <p>Audit Ref: 4.7</p> <p>With: 9 of Schedule 11.3</p> <p>From: 21-Oct-17</p> <p>To: 30-Nov-17</p> | <p>Registry was informed late of switch request of ICP 0262610035LC9A4. The delay was 29 BD</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 there are some improvements that can be made to them. There are still early days of trading for energyclubnz. It is a common occurrence during switching that NT is sent for incorrect. There was no impact on settlement. The audit risk rating is recorded as low.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| A self-breach was submitted as soon as the actual breach was found; other retailer notified, and actions agreed. | | November 2017 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| <p>On this occasion the SFTP link to the registry had stopped working and no one noticed. The breach report was only being run once a week and therefore when the issue was discovered, the ICP in question was already in breach. The breach was self-reported and resolved, the breach report is now run at least twice a week at regular intervals, and Agility has a process in place to check and report on the status of the Registry SFTP link on a bi-weekly basis.</p> | | December 2017 | |

| Non-compliance | Description | | |
|--|---|-----------------|------------------------|
| <p>Audit Ref: 12.10</p> <p>With: 3 of Schedule 15.3</p> <p>From: 19-Jun-17</p> <p>To: 31-Dec-17</p> | <p>Number of small issues related to calculation of submission volumes which needs fixing by AgilityCIS</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 there are some improvements that can be made to them. There was no impact on settlement outcome as issued was identified and volumes re-submitted as revisions. The audit risk rating is recorded as low.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| All issues raised with the system provider (Agility) as they were found and had been rectified as highest priority. | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| <p>Agility have resolved all issues raised with them previously and are in the process of resolving the latest issue identified. All RM submission files will be subjected to spot checking of one or more random ICPs to ensure compliance with the Code.</p> | | March 2018 | |