

Compliance plan for Supercharged Energy – 2018

| Audit Requirement | | |
|--|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 1.11 With: 15.37A From: 21-Jun-18 To: 24-Aug-18 | Audit report completed late. 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 low as the number of ICPs traded by Supercharged is small therefore any impact to the market will be small. | |
| Actions taken to resolve the issue | | Completion date |
| We conducted our participant audit 23 rd & 24 th of August | | 23/8/18 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| We will conduct future audits well in advance of the due date | | 31/8/18 |
| | | Remedial action status |
| | | Identified |

| Non-compliance | Description | |
|--|---|------------------------|
| Audit Ref: 1.12 With: 2A of schedule 15.1 From: 21-Aug-18 To: present | Trading without certification. 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 low as the number of ICPs traded by Supercharged is small therefore any impact to the market will be small. | |
| Actions taken to resolve the issue | | Completion date |
| Paused customer acquisition and organised audit for certification | | 31/8/2018 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Book audit in advance | | 31/8/2018 |
| | | Remedial action status |
| | | Identified |

| Non-compliance | Description | | |
|---|---|-----------------|------------------------|
| Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 27-Jul-18 To: 17-Aug-18 | 12 ICPs with incorrect profiles are recorded on the registry for ICPs with distributed generation. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as moderate as these were missed due to human error but were identified through BAU processes and corrected by the time of the site audit. The audit risk rating is low as only a small number of ICPs were affected and reconciliation submissions are correct in relation to the affected ICPs. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| Procedures updated to update profiles when meter change happens | | 22/8/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As above | | 22/8/2018 | |

| Arrangements for line function services | | |
|---|--|-----------------|
| Non-compliance | Description | |
| Audit Ref: 2.12 With: 11.16 From: 23-Feb-18 To: 31-Jul-18 | Trading on networks prior to having an arrangement in place. Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating: 5 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as none as Supercharged were unaware that they were trading on networks where they had no arrangement and were not checking this prior to switching customers in. The audit risk rating is low as the number of ICPs traded by Supercharged is small therefore any impact to the market will be small. | |
| Actions taken to resolve the issue | | Completion date |
| Customers switched in prior to UoSA were bordering other networks that we had existing agreements with. We were not aware that these customers were not on those networks until after the switch. | | 28/8/2018 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| We have established UoSA with relevant networks. We have set up a procedure to always check the network code before a switch is initiated | | 28/8/2029 |

| Changes to registry information | | | |
|--|---|-----------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 23-May-18 To: 30-May-18 | Three late MEP nominations. 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 rated as moderate as this step is now captured as part of the documented process which staff are expected to follow. The nominations were between three and 36 days late and in all cases were accepted by the MEP. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We have set up a procedure to nominate the MEP when carrying out meter changes | | 28/8/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| We will follow the procedure detailed above | | 28/8/2018 | |

| ANZSIC codes | | |
|--|--|-------------------|
| Non-compliance | Description | |
| Audit Ref: 3.6 With: 9 (1(k) of Schedule 11.1 From: 13-Mar-18 To: 31-Jul-18 | Three incorrect ANZSIC codes. Potential impact: None Actual impact: None Audit history: None Controls: None Breach risk rating: 5 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as none as Supercharged Energy were unaware of ANZSIC codes on the registry. The audit risk rating is low as this has no impact on reconciliation. | |
| Actions taken to resolve the issue | | Completion date |
| We have added to ANZSIC code acquisition into our CRM and this will be obtained prior to a customer switch | | Date 28/8/2018 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| We will be following the procedure detailed above | | Date 28/8/2028 |
| | | Identified |

| Inform registry of switch request for ICPs - standard switch (Clause 2 Schedule 11.3) | | |
|---|--|-------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 4.1</p> <p>With: 2 Schedule 11.3</p> <p>From: 05-Jun-18</p> <p>To: 11-Jun-18</p> | <p>Switching initiated for 166 ICPs where an arrangement had not been entered into and not all preconditions met.</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 | <p>Controls are rated as weak as the customer onboarding process is still being refined to ensure that the correct ICPs are switched in.</p> <p>The audit risk rating is low as the affected ICPs were withdrawn as soon as the issue was discovered before reconciliation was affected.</p> | |
| Actions taken to resolve the issue | | Completion date |
| We now have a strict set of customer requirement validations prior to any switches being undertaken | | Date 28/8/2018 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| This requirements must be met prior to any switches taking place | | Date 28/8/2018 |

| Losing trader response to switch request and event dates - standard switch | | | |
|---|--|-------------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 4.2 With: Clauses 3 and 4 Schedule 11.3 From: 15-Jun-18 To: 15-Jun-18 | One incorrect AN response code was applied. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. The impact is low. One of the three AN codes was incorrect. The ICP should have had the AD (advanced metering) code applied, and information confirming the ICPs had advanced metering was available on the registry. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We are now aware of the requirement | | 28/8/2028 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| We will ensure that all staff are trained on correct switching codes. | | Date 28/8/2028 | |

| Gaining trader informs registry of switch request - switch move | | | |
|---|--|-------------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 4.7 With: 9 Schedule 11.3 From: 23-Jul-18 To: present | One ICP switched in with no arrangement in place with the customer. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as weak as it appears that this ICP has not followed the intended process and Supercharged Energy had no record of this ICP or address in their CRM. The audit risk rating is low as the volume of ICPs is small with only four move switches completed. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| The above customer had made a switch request however they had not met all criteria for a change to be initiated and so the change was reversed. | | 28/8/2028 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| We now have a very strict onboarding process to ensure no one is switched before all prerequisites are met | | Date 28/8/2028 | |

| Withdrawal of switch requests | | |
|--|---|-------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 4.15</p> <p>With: 17 and 18 Schedule 11.3</p> <p>From: 07-Jul-18</p> <p>To: 24-Aug-18</p> | <p>One switch withdrawal incorrectly rejected.</p> <p>Incorrect withdrawal code sent for one ICP.</p> <p>One late NW request issued.</p> <p>Four late AW responses sent.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating:</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>Controls are rated as weak as the slow responses times to advise JCC are causing delays and subsequent breaches.</p> <p>The audit risk rating is low as the volume of late files is small.</p> | |
| Actions taken to resolve the issue | | Completion date |
| This was due to an under staffing issue that will be resolved by increased staff capacity in our Fiji office | | Date 28/8/2018 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| All staff will be trained to respond immediately. Response time will be managed and monitored through our CRM, Zoho | | Date 28/8/2018 |
| | | Identified |

| Electricity conveyed & notification by embedded generators | | | |
|--|--|-------------------|------------------------|
| Non-compliance | Description | | |
| <p>Audit Ref: 6.1</p> <p>With: 15.13</p> <p>From: 18-Jul-18</p> <p>To: present</p> | <p>Distributed generation for ICP 0000289650TE1FB is not being submitted or gifted.</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>The controls are rated as moderate as solar generation is a core part of Supercharged Energy's offering and the controls in place for this process will mitigate risk most of the time.</p> <p>The audit risk rating is low as distributed generation for one ICP should have been gifted but was missed.</p> | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We now have a process to change in import/export meters prior to solar connection that will eliminate the risk of this occurring again | | Date 28/8/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| As above | | 28/8/2018 | |

| Electricity supplied information provision to the reconciliation manager | | |
|---|--|-------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 11.3</p> <p>With: 15.7</p> <p>From: 23-Feb-18</p> <p>To: present</p> | <p>Network billing information incorrectly being submitted as billed information when this should be from the financial system.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | <p>The controls are rated as none as the billing information not able to be used for this reporting producing a meaningless report.</p> <p>The audit risk rating is low as this has no direct impact on reconciliation.</p> | |
| Actions taken to resolve the issue | | Completion date |
| We are integrating our CRM with the registry and the CRM will then provide a data feed to the billing program to ensure a high level of accuracy. | | Date 28/8/2018 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Integration with the registry as above | | Date 28/8/2018 |
| | | Investigating |

| Historical estimate process | | | |
|--|--|---|------------------------|
| Non-compliance | | Description | |
| Audit Ref: 12.11 With: 4 and 5 Schedule 15.3 From: 13-Mar-18 To: 14-Mar-18 | | One HE scenario calculated incorrectly. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | | Rationale for audit risk rating | |
| Low | | The controls are rated as strong as all scenarios tested worked correctly except one which was a dating error. The audit risk rating is low as only the volume of ICPs being traded is small and the volume associated with the error found was less than one kWh. | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| This was corrected during the site audit | | Date 28/8/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Standard meter change procedure will be followed | | Date 28/8/2018 | |