

Compliance plan for Plus Energy 2022

Changes to registry information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 07-Sep-20 To: 16-Dec-20	Two registry data inaccuracies were not resolved as soon as practicable: <ul style="list-style-type: none"> ICP 0000572080NR132 was recorded as active from 08/09/20 but should have been active from 07/09/20. ICP 0240230479LCC08 was recorded as active on 16/12/20 but should have has inactive status. 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 because the exceptions appear isolated, and one reconnection was complicated by multiple requests and turn downs. The audit risk rating is low because there was a one day difference in both cases.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training has been provided	22/02/2022	

Arrangements for metering equipment provision	
Non-compliance	Description
Audit Ref: 2.13 With: Clause 10.36 From: 24-Nov-20 To: 09-Feb-22	Arrangements were not in place with the MEPs for three ICPs. Two of the ICPs have since undergone MEP switches. 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 strong and the risk is low. Arrangements are in place for most ICPs. A small number of ICPs are affected, and two of the ICPs have since undergone MEP changes.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We very really come across a TRUM meter as we cannot compete with Trustpower's cross subsidisation of consumers through their local trust dividend which is only payable to a consumer if they stay with Trustpower. When we do, we typically switch that consumers ICP to our supply provider and we trade the ICP through them (as a Tier 2 retailer) therefore the ICP is not being traded by us so we have no requirement for an MEP agreement with TRUM. This means we are typically the "Trader" of the ICP for just one day as we can't switch the ICP to our provider on the same day we acquire it, the registry does not allow this, so we have to switch it one day later. Alternatively, if we were to trade the ICP we would swap the meter out for one from our preferred MEP.</p> <p>For CTCT meters, we typically switch that consumers ICP to our supply provider and we trade the ICP through them (as a Tier 2 retailer) therefore the ICP is not being traded by us so we have no requirement for an MEP agreement with CTCT. This means we are typically the "Trader" of the ICP for just one day as we can't switch the ICP to our provider on the same day we acquire it, the registry does not allow this, so we must switch it one day later. Alternatively, if we were to trade the ICP we would swap the meter out for one from our preferred MEP.</p> <p>For ICP 0006560414HB35D we endeavored to have this legacy non communicating meter replaced with a smart meter from our preferred MEP. However, it has been discovered that this is a "check meter" located on a meter board with other "check meters" and that there is no room on the meter board to upgrade this to a smart, communicating meter. We are not receiving any services from the MEP for this meter, they provide no reads, so we have had to arrange for this meter to be read manually, at our cost. We will request an MEP agreement from CTCT for this meter, if we are unable to enter into an agreement with CTCT we will switch this ICP to our supply provider.</p>		<p>Meter replaced 10/2/2022</p> <p>Meter replaced 8/7/2021</p> <p>Attempting to obtain an MEP agreement with CTCT. Request sent 27/2/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Have applied for an MEP agreement with CTCT.		27/02/2022	

Provision of information on dispute resolution scheme		
Non-compliance	Description	
<p>Audit Ref: 2.19</p> <p>With: Clause 11.30A</p> <p>From: 30-Dec-20</p> <p>To: 09-Feb-22</p>	<p>Information on Utilities Disputes is provided in response to inbound calls only where the call relates to a complaint or dispute but should be provided when responding to all customer enquiries.</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 because information on Utilities Disputes is provided when responding to customer enquiries in most circumstances.</p> <p>The risk is low because Utilities Disputes information is provided where a customer phones regarding a complaint or dispute.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Consumers should not have to be advised of a dispute resolution process when they are not calling about a dispute. We find this creates further conversation, extending the call time, taking valuable time from both the consumer and out staff, potentially leading to delays in servicing the next consumer, and creates confusion for the consumer as they don't understand why they are being told this when it has nothing to do with their call. We understand the intent is to raise the awareness of the dispute resolution service, we do this at least 12 times every year with advice of the disputes resolution service being included in the consumers monthly invoicing email and in any other email sent to a consumer as a result of an enquiry.</p>		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We typically email a consumer after any inbound call to confirm any action taken or arrangements made and the advice about disputes resolution is included in this email. We participated in a group zoom session with the EA when the consumer advice about dispute resolution was being designed and implemented and it was agreed then that a follow up email as outlined above is acceptable.</p>	Already in place	

Provision of information on electricity plan comparison site			
Non-compliance		Description	
Audit Ref: 2.20 With: Clause 11.30B From: 14-Jan-221 To: 15-Jan-22		Information on Powerswitch was temporarily missing from Plus Energy's website. 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 strong and the risk is low because the information was only temporarily missing.	
Actions taken to resolve the issue		Completion date	Remedial action status
Information on Powerswitch had been "dropped" from our site, this has now been restored		15/1/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
I.T. advise this was a "one off" and is not expected to occur again.		15/1/2022	

Changes to registry information			
Non-compliance		Description	
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 30-Dec-20 To: 18-Aug-21		Three late status updates to active. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as moderate because they are adequate to ensure that the registry is updated on time most of the time. The risk is low as most updates were completed on time or soon after they were due. On average it took 2.46 business days to complete an active status update and the latest update was made ten business days after the event date.	

Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training completed	21/2/2022	

Provision of information to the registry manager		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 9 Schedule 11.1 From: 07-Sep-20 To: 08-Sep-20	ICP 0000572080NR132 was recorded as active from 08/09/20 but should have been active from 07/09/20. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong. The incorrect date was an isolated data entry error. The audit risk rating is low because there was a one day difference.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training completed	21/02/2022	

ANZSIC Codes		
Non-compliance	Description	
Audit Ref: 3.6 With: 9 (1)(k) of Schedule 11.1 From: 01-Apr-21 To: 14-Jan-22	0000062299CP0DC which is a water supply pump which has the S953 (other personal services) code applied instead of D281100 (water supply). The code was corrected during the audit. 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 and the risk is low because only one exception was identified, and it was corrected during the audit. There is no impact on settlement outcomes from incorrect ANZSIC codes but there is a low impact on the Electricity Authority's reporting accuracy, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Retained the ANSIC code of the losing retailer as couldn't locate anything more appropriate at that time.		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Has been corrected	15/01/2022	

Management of "active" status	
Non-compliance	Description
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 07-Sep-20 To: 16-Dec-20	ICP 0000572080NR132 was recorded as active from 08/09/20 but should have been active from 07/09/20. ICP 0240230479LCC08 was recorded as active on 16/12/20 but should have has inactive status. 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>The controls are rated as strong because the exceptions appear isolated, and one reconnection was complicated by multiple requests and turn downs.</p> <p>The audit risk rating is low because there was a one day difference in both cases.</p>	
Actions taken to resolve the issue		Completion date
No action required		
Preventative actions taken to ensure no further issues will occur		Completion date
Refresher training completed		21/02/2022
Identified		

Losung trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>From: 01-Jan-21</p> <p>To: 27-Oct-21</p>	<p>Three transfer CS files (0191652385LCCD2 14/04/21, 0000233486MPD9C 01/01/21 and 0986989295LC9B9 27/10/21) contained incorrect average daily kWh.</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 now rated as strong because the method to calculate average daily kWh has been updated to match the Registry Functional Specification. The non-compliances occurred because the average daily kWh was calculated based on the average daily kWh for the last month of supply at the time the CS files were created.</p> <p>The impact is low because the affected meters have AMI capability, and it is unlikely that the average daily kWh would be needed to create forward estimate.</p>	
Actions taken to resolve the issue		Completion date
We had previously been advised to use last billing period to calculate the average daily used as this is more accurate for the consumer and gaining retailer than using just the last day the ICP is with as the "average" usage. We have now been advised that we are to use just the last day the ICP is with us and we have been doing this since advised of this		15/01/2022
Identified		

Preventative actions taken to ensure no further issues will occur	Completion date
Have adopted this advice and are now using just the last day with us as the average.	15/01/2022

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.1 From: 05-May-21 To: 10-Jun-21	Two E2 breaches. 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, because most event dates are compliant and the exceptions appear to be isolated. The impact is low, one CS event date was one day early and the other was issued from the correct move in date.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
0156058448LCB18 was an attempt by the consumer aided by their gaining retailer, to avoid paying for electricity they had used between their actual MI date of 10 June and the proposed switch date of 16 August. With the help of the property owner and their property manager we were able to gain the consumers and their gaining retailers acknowledgement that they had in fact moved in on the 10 June. Refresher training completed for 0000742080TU499	Was correctly entered at the time. 21/2/2022	

Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 05-May-20</p> <p>To: 12-Jun-21</p>	<p>Seven switch move CS files contained incorrect average daily kWh (1002042884LC957 12/06/21, 1002069641LC3D1 09/06/20, 0000233486MPD9C 12/05/20, 0674912572LC3B7 30/06/20, 0000812235TUC6D 29/06/21, 0000060102NTBB7 20/09/20, and 1001128512LC188 17/05/21).</p> <p>Four switch move CS files contained incorrect last actual read dates (0000742080TU499 05/05/21, 0686291993LCFD0 29/06/20, 0674912572LC3B7 30/06/20 and 0000812235TUC6D 29/06/21).</p> <p>Three switch move CS files contained incorrect switch event readings (0686291993LCFD0 29/06/20 21297 (A) instead of 21288 (A) difference of -9, 0674912572LC3B7 30/06/20 18713 (A) instead of 18680 (A) difference of -33, 0000812235TUC6D 29/06/21 38068 (E) instead of 38092 (A) difference of +24 kWh.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</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 overall:</p> <ul style="list-style-type: none"> the method to calculate average daily kWh has been updated to match the Registry Functional Specification and the non-compliances occurred because the average daily kWh was calculated based on the average daily kWh for the last month of supply at the time the CS files were created, and the incorrect last actual read dates and readings appear to be manual data processing errors. <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement. All errors identified occurred in June 2021 or earlier.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have changed the average daily usage calculation as explained above. The incorrect use of the read date instead of the last read date is a human error, refresher training has been completed on this. The use of the incorrect switch date resulted in the incorrect last read being used, a related issue. Refresher training has been completed.	15/01/2022	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
Refresher training completed	21/02/2022

Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 01-Sep-21 To: 07-Sep-21	Two incorrect withdrawal reason codes were applied. 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. The DF code was incorrectly applied where the requested date was incorrect, but not more than ten business days in the future. The impact is assessed to be low because a small proportion of NWs were issued late, or with incorrect codes.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We were unaware that the DF code should only be applied where the switch event date is more than ten business days in the future. The error was a date issue hence we used the DF code. Training completed.	21/2/2022	

Metering information		
Non-compliance	Description	
<p>Audit Ref: 4.16</p> <p>With: Clause 21 Schedule 11.3</p> <p>From: 29-Jun-20</p> <p>To: 29-Jun-21</p>	<p>Three switch move CS files did not contain the actual reading or best estimate of consumption on Plus Energy's last day of supply:</p> <ul style="list-style-type: none"> • 0686291993LCFD0 29/06/20 21297 (A) instead of 21288 (A) difference of -9 • 0674912572LC3B7 30/06/20 18713 (A) instead of 18680 (A) difference of -33 • 0000812235TUC6D 29/06/21 38068 (E) instead of 38092 (A) difference of +24 kwh. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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. The incorrect readings appear to be manual data processing errors.</p> <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement. All errors identified occurred in June 2021 or earlier.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>As described above, we have changed the way we have been calculating average daily usage to use just the last day the ICP is with us.</p> <p>As per 4.10 the incorrect last date was human error, we used the switch out date instead of the prior days date. This resulted in the incorrect read being used (out by one day). Refresher training has been completed.</p>	15/01/2022	

NHH meter reading application		
Non-compliance	Description	
<p>Audit Ref: 6.7</p> <p>With: Clause 6 Schedule 15.2</p> <p>From: 05-May-20</p> <p>To: 12-Jun-21</p>	<p>Three switch move CS files did not contain the actual reading or best estimate of consumption on Plus Energy's last day of supply:</p> <ul style="list-style-type: none"> • 0686291993LCFD0 29/06/20 21297 (A) instead of 21288 (A) difference of -9 • 0674912572LC3B7 30/06/20 18713 (A) instead of 18680 (A) difference of -33 • 0000812235TUC6D 29/06/21 38068 (E) instead of 38092 (A) difference of +24 kwh. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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. The incorrect readings appear to be manual data processing errors.</p> <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement. All errors identified occurred in June 2021 or earlier.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As described above, we have changed the way we have been calculating average daily usage to use just the last day the ICP is with us. As per 4.10 the incorrect last date was human error, we used the switch out date instead of the prior days date. This resulted in the incorrect read being used (out by one day). Refresher training has been completed.		

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 29-Jun-21 To: 29-Jun-21	An incorrect switch event read and read type was recorded in the CS file for ICP 0000812235TUC6D 29/06/21. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate. The incorrect reading appears to be a manual data processing error. The impact is assessed to be low because the incorrect information may have a minor impact on settlement. All errors identified occurred in June 2021 or earlier.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training completed	21/02/2022	

Accuracy of submission information	
Non-compliance	Description
Audit Ref: 12.7 With: Clause 15.12 From: 29-Jun-20 To: 29-Jun-21	Three switch move CS files did not contain the actual reading or best estimate of consumption on Plus Energy's last day of supply, which resulted in under or over submission relative to the correct value: <ul style="list-style-type: none"> • 0686291993LCFD0 29/06/20 21297 (A) instead of 21288 (A) difference of -9 • 0674912572LC3B7 30/06/20 18713 (A) instead of 18680 (A) difference of -33 • 0000812235TUC6D 29/06/21 38068 (E) instead of 38092 (A) difference of +24 kwh. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong because the agreed switch readings were applied for reconciliation. The issue was caused by inaccurate readings being applied in a small number of CS files.</p> <p>The impact is assessed to be low because the incorrect information may have a minor impact on settlement. All errors identified occurred in June 2021 or earlier.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action required			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As described above, we have changed the way we have been calculating average daily usage to use just the last day the ICP is with us. As per 4.10 the incorrect last date was human error, we used the switch out date instead of the prior days date. This resulted in the incorrect read being used (out by one day). Refresher training has been completed.		21/02/2022	

Historical estimate reporting to RM			
Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: Clause 10 Schedule 15.3</p> <p>From: Nov-20 r3, Dec-20 r3, Jul-21 r3</p>	<p>The 3-month historic estimate threshold was not met for one NSP each for three submissions.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>Controls are strong and the impact is low. One ICP was supplied at the affected NSP, and readings were not obtained by the time revision three was produced. Reads were obtained in time for revision seven for November and December 2020.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action required			Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We endeavour wherever possible to replace legacy, non-communication meters and we chase up MEPs if they are not providing reads for any of their smart meters in an endeavour to get them to fix their communication issues. Where we are left with a non-communicating meter we will add it to our manual ammeter reading providers rounds.</p> <p>We will endeavour to ensure future situations and dealt with in a timely manner to ensure compliance.</p>	21/2/2022	