

Compliance Plan for South Pacific Energy (SPEL) - 2024

Non-compliance	Description		
Audit Ref: 1.11 With: Clause 15.37A From: 10-Apr-20 To: 29-Feb-24	Company has been not audited within 12 months after gaining the first ICP Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating: 8		
Audit risk rating	Rationale for audit risk rating		
Medium	There are no controls on place. The audit risk rating is recorded as medium because of the length of time of non-compliance.		
Actions taken to resolve the issue	Completion date	Remedial action status	
SPEL engaged TEG Associates to conduct an Audit	May 2024	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
SPEL will take note of the required audit dates from the EA and schedule audits accordingly	30 May 2024		

Non-compliance	Description	
Audit Ref: 2.1 With: clause 11.2 From: 12-Jun-19 To: 29-Feb-24	The low number of information inaccuracies was identified during the audit 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 identified as moderate. The audit risk rating is recorded as low as settlement are not impacted.	
Actions taken to resolve the issue	Completion date	Remedial action status
This is a catch all finding that has no specific resolution, and SPEL believes it is inappropriate to assign an audit penalty to		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Dealt with in the audit under the specific item involved		

Non-compliance	Description	
Audit Ref: 2.11 With: Clause 10.33A From: 10-Dec-22 To: 17-Jan-24	One ICP was reconnected without current certification at the time of reconnection Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There are no controls on place. The audit risk rating is recorded as low because only one ICP was found non-compliant	
Actions taken to resolve the issue	Completion date	Remedial action status
SPEL believes we are being penalised for a function that is the responsibility of the MEP (metering compliance). The specific rule requires SPEL to request certification within 5 working days. However, the MEP made no effort to re-certify the installation. We also note that the ICP in question has since switched out and the current retailers are still trading in a non-compliant meter		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
The EA should enforce MEPS to maintain metering compliance		

Non-compliance	Description		
Audit Ref: 2.19 With: 10.30A From: 12-Jun-19 To: 29-Feb-24	Information about Utilities Dispute are not provided to customers on the company website Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There are no controls on place. The audit risk rating is recorded as low as settlement are not impacted.		
Actions taken to resolve the issue		Completion date	Remedial action status
SPEL will provide information about Utilities Disputes on the company website		30 June 2024	Identified
SPEL will add information about Utilities Disputes to outbound communications i.e. e-mails distributing invoices		15 June 2024	
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL will ensure the company website provides information about Utilities Disputes going forward		30 June 2024	
SPEL will ensure outbound communications provide information about Utilities Disputes going forward		15 June 2024	

Non-compliance	Description		
Audit Ref: 2.20 With: 11.30B From: 12-Jun-19 To: 29-Feb-24	Information about Power Switch are not provided to customers on the company website Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There are no controls on place. The audit risk rating is recorded as low as settlement are not impacted.		
Actions taken to resolve the issue		Completion date	Remedial action status
SPEL will provide information about Power Switch on the company website		30 June 2024	Identified
SPEL will add information about Power Switch to outbound communications i.e. e-mails distributing invoices		15 June 2024	
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL will ensure the company website provides information about Power Switch going forward		30 June 2024	
SPEL will ensure outbound communications provide information about Power Switch going forward		15 June 2024	

Non-compliance	Description		
Audit Ref: 3.3 With: Clause 10 of Schedule 11.1 From: 01-Mar-20 To: 08-Jan-24	Late status and trader updates for small number of ICPs 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 identified as moderate. "Inactive" ICPs where consumption has been detected is monitor monthly. The audit risk rating is recorded as low because of small number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
The low number of instances (over four years) indicates that this is not a systematic issue, bi-monthly monitoring is generally effective		30 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL will continue with bi-monthly monitoring		30 May 2024	

Non-compliance	Description		
Audit Ref: 3.5 With: Clause 9 of Schedule 11.1 From: 01-Mar-20 To: 14-Oct-20	One late update of ANZIC code Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Medium	Controls are identified as strong. Only one late update. The audit risk rating is recorded as medium because of the length of time of non-compliance.		
Actions taken to resolve the issue	Completion date	Remedial action status	
The Audit identified one instance in four years of operation. The low number of instances indicates that this is not a systematic issue	30 May 2024	Disputed	
Preventative actions taken to ensure no further issues will occur	Completion date		
SPEL will continue with the existing process	30 May 2024		

Non-compliance	Description		
Audit Ref: 4.3 With: Clause 5 of Schedule 11.3 From: 29-Mar-22 To: 29-Feb-24	Incorrect calculation of average daily consumption (AMI reads) recorded in CS files Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are identified as strong. Technically average daily consumption calculation are correct but it differs from the Authority guidelines. The audit risk rating is recorded as low, impact on settlement outcomes is negligible		
Actions taken to resolve the issue		Completion date	Remedial action status
Quoting from above "Technically average daily consumption calculation are correct". Guidelines are technically just that i.e. Guidelines		30 May 2024	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL will continue with the existing process		30 May 2024	

Non-compliance	Description		
Audit Ref: 4.8 With: Clause 10(1) of Schedule 11.3 From: 18-Nov-21 To: 25-Nov-21	No AN file was sent for one switch. SPEL did not accept the event date proposed by the losing trader for 3 ICPs The date proposed by SPEL was one day earlier than the gaining trader's proposed event date. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are identified as strong. Only one AN file was not sent. The audit risk rating is recorded as low, impact on settlement outcomes is negligible		
Actions taken to resolve the issue		Completion date	Remedial action status
This is a very low number of instances over four years. The low number of instances indicates that this is not a systematic issue		30 May 2024	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL will continue with the existing process		30 May 2024	

Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 of Schedule 11.3 From: 29-Apr-20 To: 29-Feb-24	Incorrect calculation of average daily consumption (AMI reads) recorded in CS files Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are identified as strong. Technically average daily consumption calculation are correct but it differs from the Authority guidelines. The audit risk rating is recorded as low, impact on settlement outcomes is negligible	
Actions taken to resolve the issue	Completion date	Remedial action status
This is a repeat of the same instance in 4.3. SPEL believes it is inappropriate to be penalised multiple times for the same instance (if indeed at all)	30 May 2024	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
SPEL will continue with the existing process	30 May 2024	

Non-compliance	Description		
Audit Ref: 6.6 With: Clause 3(1) of Schedule 15.2 From: 12-Jun-19 To: 29-Feb-24	The requirements for manual interrogation of NHH metering installations are not followed Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There are no controls on place. SPEL does not follows requirements for manual interrogation of NHH metering installations The audit risk rating is recorded as low, impact on settlement outcomes is minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
The following ICPs have been deenergised and changed to Inactive Status. ICP: 0325739323LC998, ICP: 0374822670LCF30, ICP: 0376719397LC081, ICP: 0398278385LCDA0, and ICP: 0280695616LC82D SPEL has provided manual readings to JC Consulting for ICP: 0000031147WE440 and ICP: 0000208063UN80E SPEL is pursuing manual readings for ICP: 1002048626UN392, ICP: 0100528686LC53F, and ICP: 1001111828LCC65		30 June 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL is liaising with consumers to arrange access to take regular manual readings for ICP: 1002048626UN392, ICP: 0100528686LC53F, and ICP: 1001111828LCC65. Additional ICPs will be added as and when required. Manual readings will be reported to JC Consulting within 48 hours of being received		30 June 2024	

Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) of Schedule 15.2 From: 01-Nov-21 To: 29-Feb-24	100% attainment was not achieved for number of NSPs over 12 months Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There are no controls on place. Reads are provided on ad-hoc basis., The audit risk rating is recorded as low, impact on settlement outcomes is minor (small number ICPs)	
Actions taken to resolve the issue	Completion date	Remedial action status
The following ICPs have been deenergised and changed to Inactive Status. ICP: 0325739323LC998, ICP: 0374822670LCF30, ICP: 0376719397LC081, ICP: 0398278385LCDA0, and ICP: 0280695616LC82D SPEL has provided manual readings to JC Consulting for ICP: 0000031147WE440 and ICP: 0000208063UN80E SPEL is pursuing manual readings for ICP: 1002048626UN392, ICP: 0100528686LC53F, and ICP: 100111828LCC65	30 June 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
SPEL is liaising with consumers to arrange access to take regular manual readings for ICP: 1002048626UN392, ICP: 0100528686LC53F, and ICP: 100111828LCC65. Additional ICPs will be added as and when required. Manual readings will be reported to JC Consulting within 48 hours of being received	30 June 2024	

Non-compliance	Description		
Audit Ref: 6.10 With: Clause 9(1) of Schedule 15.2 From: 01-Nov-21 To: 29-Feb-24	90% attainment was not achieved for number of NSPs over 4 months Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There are no controls on place. Reads are provided on ad-hoc basis., The audit risk rating is recorded as low, impact on settlement outcomes is minor (small number ICPs)		
Actions taken to resolve the issue	Completion date	Remedial action status	
The following ICPs have been deenergised and changed to Inactive Status. ICP: 0325739323LC998, ICP: 0374822670LCF30, ICP: 0376719397LC081, ICP: 0398278385LCDA0, and ICP: 0280695616LC82D SPEL has provided manual readings to JC Consulting for ICP: 0000031147WE440 and ICP: 0000208063UN80E SPEL is pursuing manual readings for ICP: 1002048626UN392, ICP: 0100528686LC53F, and ICP: 1001111828LCC65	30 June 2024	Identified	
Preventative actions taken to ensure no further issues will occur	Completion date		
SPEL is liaising with consumers to arrange access to take regular manual readings for ICP: 1002048626UN392, ICP: 0100528686LC53F, and ICP: 1001111828LCC65. Additional ICPs will be added as and when required. Manual readings will be reported to JC Consulting within 48 hours of being received	30 June 2024		

Non-compliance	Description		
Audit Ref: 12.8 With: Clause 4 of Schedule 15.2 From: 01-Nov-21 To: 14-Sep-22	Estimated volumes for one NSP in July 2021 were not replaced by permanent estimate by the month 14 revision cycle Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are identified as strong. It was only one NSP in July 2021 for which estimated volumes were not replaced by permanent estimate. The audit risk rating is recorded as low, impact on settlement outcomes is negligible		
Actions taken to resolve the issue		Completion date	Remedial action status
One instance in four years that dates back to 2021. The low number of instances indicates that this is not a systematic issue		30 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
SPEL will continue with the existing process		30 May 2024	

Non-compliance	Description		
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: 01-Nov-21 To: 14-Sep-22	Historical estimates target not met for revisions 3,7, and 14 for 25 months 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 identified as moderate. It was only one NSP in July 2021 for which estimated volumes were not replaced by permanent estimate. The audit risk rating is recorded as low, impact on settlement outcomes is minor		
Actions taken to resolve the issue		Completion date	Remedial action status
A predictable result from the number of long-term unread meters		30 May 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Manual meter reading processes will be improved		30 May 2024	