

Compliance plan for Pulse Energy 2020

Non-compliances

Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11.2; 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ/PPPP A small quantity of information in the registry was inaccurate, Incorrect information in CS files</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are assessed as moderate. They will mitigate risk most of the time but there is room for improvement. Recently introduced reports help to identify inaccuracies and correct them. Audit risk rating is assigned as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The existing reports are part of an ongoing programme of continuous improvement. We have cleared the problems on 4 of these ICPs. Pulse is investigating on rest.		31/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Existing reports will be further enhanced and added to as the opportunity arises, and as we can devise suitable ways to detect errors.		01/05/2021	

Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: 15.35</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - one breach was recorded for late or inaccurate submissions.</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	Controls are assessed as strong. Audit risk rating is recorded as low because files were late no more than one day therefore the RM was able to process them in time.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse fixed the submission files after being notified by reconciliation manager on 20 th August 2020.		20 th August 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse has the fixed the system issue. Additional processes have been put in place to check for similar issues in submission files before submitting.		28 th August 2020	

Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - 4 reconnections had expired certification recorded on the registry when they were reconnected; 0000509411CE968 made active before its installation was certified.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate. Pulse Energy proactively works with MEPs to ensure meters are certified when an ICP is reconnected. Audit risk rating is recorded as low due to the small number of ICPs affected		
Actions taken to resolve the issue		Completion date	Remedial action status
Training and procedures have been modified to ensure agents are aware of the need to advise customers when a meter must be recertified. The cases found are related to agent training issue.		01/09/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New reporting and procedures have been put in place to cover this issue. Pulse will strengthen training to make sure agents check certification date before issuing a reconnection job.		01/01/2021	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ/PPPP - Late updates of “inactive” and “active” status and trader information.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. There are good processes in place, they need to be rigorously followed. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
New controls have been introduced and are working to contain what was previously a major problem.		01/09/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training and processes will be further tweaked to ensure that updates are notified within timeframes whenever it is humanly possible to do so. However, it is important to recognize that there will always be some number of late updates arising from causes beyond our control. It has always been our policy to prioritize accuracy over timeliness, whenever the two conflict, and we will continue to submit late updates when it is necessary to ensure accurate reconciliation.		01/03/2020	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 9 of Schedule 11.1</p> <p>From: 26-Mar-20</p> <p>To: 26-Aug-20</p>	<p>PUNZ - 11 new connections for which the update to “active” status was done later than 5 business days, late updates of ANZSIC code for 4 ICPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate; a small number of updates is outside of requirements. The audit risk rating is assessed as low because there is a process in place to identify and correct incorrect entries and volumes will be washed up through the revision process.		
Actions taken to resolve the issue		Completion date	Remedial action status
Reporting has been introduced, and a regular process instituted to ensure updates are made with minimum delay.		01/04/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have requested changes in Gentrack functionality that will allow us to maintain profiles directly.		01/09/2021	

Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: 9(1)(k) of Schedule 11.1</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - 209 ICPs had incorrect ANZSIC code recorded in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because there are some improvements that can be made. ANZSIC code is check during a sign-up process. The audit risk rating is recorded to be low. No impact on market settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will develop a report designed to identify suspect ANZSIC errors and introduced a program to check these codes when customers contact us for other reasons.		01/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse is developing a process to work with customers and networks to pinpoint what the actual end use of the property is.		01/09/2021	

Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: 9(1)(f) of Schedule 11.1</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ -1 ICP had incorrect UML details recorded in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating:1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. UML details are recorded correctly except for one ICP which was corrected. The audit risk rating is recorded to be low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The has been corrected.		23/11/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Reporting is now checked regularly, and discrepancies are investigated. However, further procedural changes are needed to ensure that discrepancies are appropriately resolved.		01/02/2020	

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PPPP - Average daily consumption methodology is incorrect, it calculated for the last 7 days, 50% of CS files had incorrect "Last Read Date"</p> <p>PUNZ - Average daily consumption methodology is incorrect for ICPs where usage is less than 1 kWh. Information for a small number of ICPs is incorrect</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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. Pulse Energy proactively works with Gentrack/ADSL to ensure that information in CS files is correct. There has not been much progress to improve Gentrack's performance. Audit risk rating is recorded as low due to the small number of ICPs affected</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A system fix has been implemented on PPPP. Pulse is still working with Gentrack to address known issues in the CS file data. Some of the issues have been resolved, although some remain.		01/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Work is continuing to resolve the remaining areas of noncompliance. The issue of incorrect read quality flags has already been resolved in January.		01/04/2020	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With:6(1) and 6A of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 31-Aug-20</p>	<p>PUNZ - 11 late RR files for Standard Switch. Lost ICPs do not switch on the same read when RR file accepted</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. The tool used by Pulse Energy to evaluate CS reads from losing traders is highly effective. One of the causes of late RR files was a lack of access by meter readers due to COVID-19. Audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse is implementing a new process to bring the RR records to COBRA.		31/01/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A monthly manual process has been setup to verify final reads in COBRA comparing with Gentrack.		01/12/2020	

Non-compliance	Description		
<p>Audit Ref: 4.5</p> <p>With:6(3)(a) of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 06-Feb-20</p>	<p>PUNZ - 6 RR files provided by a gaining trader (AMI reads) within 5 BD were not accepted</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate; more training is required. Audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
This issue has been identified as a training issue. All the issues found have been cleared, Training issue. A refresh training was provided in February 2020. There is no other occurrence after the February training section.		28/02/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This is a training issue, which is in the process of being corrected now.		28/02/2020	

Non-compliance	Description		
<p>Audit Ref: 4.7</p> <p>With: 9 of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>Incorrect type of switch used</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Multiple times</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. It is a common practise used between some traders. Audit risk rating is recorded as low. The impact on settlement outcomes is minor, ICPs switch on the same read		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse is aware of this non-compliance issue. There is a lack in mechanism to realistically backdate TR switches. It is common practice to use NTMI for backdated switches to ensure that the site switches on the requested date. This was discussed in the EA's recent switch process review, where the consensus was that a new switch type should be created for use in these instances.		01/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.		01/12/2019	

Non-compliance	Description		
<p>Audit Ref: 4.8</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PPPP – AN file not sent for a small number switch moves (approx. 19)</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; more staff training and follow up is required.</p> <p>No impact on settlement outcomes. Audit risk rating low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
It is a staff training issue. Pulse has fixed the problems that we found. We have refreshed training on the staffs.		27/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above.		27/11/2020	

Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With:10(2) of Schedule 11.3</p> <p>From: 25-Jul-20</p> <p>To: 30-Sep-20</p>	<p>PPPP – The switch event date was backdated for 5 ICPs</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	Controls are rated as moderate; more personnel training is needed. Audit risk rating is recorded as low due to the small number of ICPs affected		
Actions taken to resolve the issue		Completion date	Remedial action status
All the occurrences have been cleared. Customers signup to PPPP during weekends and our switch system picked them up only on weekdays.		14 th September 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse is working on a system upgrade to kick off the switching process earlier.		31/01/2021	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 11 of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PPPP - Average daily consumption methodology is incorrect, it calculated for the last 7 days, 50% of CS files incorrect "Last Read Date"</p> <p>PUNZ - Average daily consumption methodology is incorrect for ICPs where usage is less than 1 kWh. Information in CS files for a number of ICPs was incorrect</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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. Pulse Energy proactively works with Gentrack/ADSL to ensure that information in CS files is correct. There has not been much progress to improve Gentrack's performance. Audit risk rating is recorded as low due to the small number of ICPs affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As the auditor has noted, we are working with Gentrack to address known issues in the CS file data. Some of the issues have been resolved, although some remain.		01/04/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Work is ongoing to ensure that all information provided in CS files is fully compliant.		01/04/2021	

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With:12 of Schedule 11.3</p> <p>From: 01-Nov-19</p> <p>To: 31-Aug-20</p>	<p>PUNZ - 11 late RR files for switch move; Lost ICPs do not switch on the same read when RR file accepted</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate. The tool used by Pulse Energy to evaluate CS reads from losing traders is highly effective. One of the causes of late RR files was a lack of access by meter readers due to COVID-19. Audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse is implementing a new process to bring the RR records to COBRA.		31/01/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A monthly manual process has been setup to verify final reads in COBRA comparing with Gentrack.		01/12/2020	

Non-compliance	Description		
<p>Audit Ref: 4.12</p> <p>With: 14 of Schedule 11.3</p> <p>From: 01-Feb-19</p> <p>To: 20-Apr-20</p>	<p>The proposed event date was not in the same month as the date on which PUNZ advised the registry manager switch 1000023002BPF97</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	Control are recorded as strong. It was only one ICP and it was a very special set up which is a precaution for a very unlikely situation. No impact on market settlement. Audit risk low.		
Actions taken to resolve the issue		Completion date	Remedial action status
It is a one-off operation to tidy up reconciliation setup of Aniwhenua power station.		01/06/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above		01/06/2020	

Non-compliance	Description		
Audit Ref: 4.15 With: 17 of Schedule 11.3 From: 01-Feb-19 To: 20-Apr-20	PUNZ -6 late NW files Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, more monitoring and follow up required. Audit risk rating is low because of the small number of ICPs.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse is aware of this issue due to late win-backs.		01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will investigate on how to manage late win-backs.		01/04/2021	

Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: 10.13(2)(b)</p> <p>From: 30-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - The profile RPS PV1 is assigned to an ICP one day after the switch event date. RM not notified</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once before</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as weak. There has not been a clear demarcation point for which the Pulse Energy team is responsible for making sure that export/import meters are installed, and the correct type of profile is recorded in the registry.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have cleared all the issues found so far.		01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: 8(1) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - 100% attainment was not achieved for more than 8 NSPs in 12 months period</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Many times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as strong. There are good processes in place. Overall percentage of compliance is 99.97%. Some ICPs are very difficult to read, access problems. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse has established a robust process to ensure all the meters are read according to compliance requirements. All the meters that Pulse is unable to read are with exceptional circumstances. Pulse tried at least 4 different methods(calling, texting, emails and sending field visits) to obtain meter reads on ICPs without read for 12 months.</p>		01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Pulse will further improve the processes to record reasons for no read.</p>		01/04/2021	

Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: 9(1) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUN - Z 90% attainment was not achieved for more than one NSP over 4 months</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Many times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong. There are good processes in place. Overall percentage of compliance is 99.3%. Some ICPs are very difficult to read, access problems. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has established a robust process to ensure all the meters are read according to compliance requirements. All the meters that Pulse is unable to read are with exceptional circumstances. Pulse tried at least 4 different methods(calling, texting, emails and sending field visits) to obtain meter reads on ICPs without read for 12 months.		01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will further improve the processes to record reasons for no read.		01/04/2021	

Non-compliance	Description		
<p>Audit Ref: 6.13</p> <p>With: 11(2)(e) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - No interrogation log is generated by the interrogation software to record details of all interrogations for readings provided by AccuCal</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. There are only two meters read by AccuCal. AccuCal is certified as an ATH and MEP. Reading meters and providing data to traders are additional services provided by AccuCal. In the previous audit it was noted that Pulse Energy was planning to use the services of another party to read meters read by AccuCal, but a decision has not been made yet.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse receives the interrogation log files from AccuCal. However, Pulse does not current have a process to review and action on the interrogation log files. Pulse is in talk with AccuCal to see if AccuCal can be compliant with 11(2)(e). Pulse may consider transferring the meter data provision function to other fully compliant MEP.</p>		18/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above		18/12/2020	

Non-compliance	Description		
<p>Audit Ref: 8.1</p> <p>With: 19(1) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - 7 corrections for bridged meters have not been processed</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 they are unlikely to mitigate the risk of incorrect data. Processes are in place to identify corrections required, but they are not consistently followed through to completion.</p> <p>The impact is difficult to quantify but is estimated to be low based on the corrections reviewed during the audit.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All the 7 issues found have been cleared. We have identified these occurrences as training issue. Pulse has provided refreshment training required to our staffs.		27/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will work on improving processes on handling bridged meters.		31/01/2021	

Non-compliance	Description		
<p>Audit Ref: 9.3</p> <p>With: 3(5) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ - Meter data provided by AMCI, FCLM, and EDM I for reconciliation is rounded therefore it results in technical breach for Pulse Energy</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are recorded as moderate. It is a technical breach. Pulse Energy has to request their service provides to provide raw meter data. The impact on settlement outcomes is medium therefore the audit risk rating is recorded as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse will engage with AMCI, FCLM, and EDM I to find a solution.		31/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above		31/12/2020	

Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: 17(4)(f) of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PPPP/PUNZ -Meter event information for AMI meters is not reviewed because log files are not provided by MEPs and agents except AccuCal</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate because the lack of review of log files from MEPs that are provided to them could affect the integrity of data. Pulse Energy have very stringent data validation processes which can offset the possible inaccuracy of data. The majority of sites traded by Pulse Energy are NHH.</p> <p>The risk rating is low because most issues should be identified through Pulse Energy's other read validation processes, and some events are emailed by the MEPs for urgent action.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has a robust HHR metering reading validation process in place to mitigate some of the risks. Pulse will work with MEPs for log files		31/01/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above.		31/01/2021	

Non-compliance	Description		
Audit Ref: 11.4 With: 15.8 From: 01-Nov-19 To: 30-Sep-20	HHRAGGR files do not contain electricity supplied information Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Pulse Energy submits submissions volumes as per the reconciliation manager specification.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse submits volume files according to RM specification		01/10/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will continue to submit volume files according to RM specification		01/10/2020	

Non-compliance	Description		
<p>Audit Ref: 12.1</p> <p>With: 15.36</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ -Partly incorrect daylight saving adjustment for NZDT for data provided by AccuCal</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>Audit risk rating is recorded as low because interval volumes for Aniwhenua Barrage (1000023001BP357) are low and the interconnection point ANI0331 BOPD NP interval volumes do not vary much therefore impact on settlement outcomes is minor</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse will fix our adjustment program and submit corrected data.		31/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will put in additional daylight-saving checking steps for April and September months.		31/12/2020	

Non-compliance	Description		
Audit Ref: 12.7 With: 15.12 From: 01-Nov-19 To: 30-Sep-20	PUNZ - Some submission volumes were inaccurate Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating:3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak as they are unlikely to mitigate the risk of incorrect data. Processes are in place to identify corrections required, but they are not consistently followed through to completion. Audit risk rating is recorded as low as error identified during the audit are not significant.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse is implementing a process to update RR file reads to COBRA.		18/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will continue to improve our processes according to the audit findings.		01/04/2021	

Non-compliance	Description		
<p>Audit Ref: 12.8</p> <p>With: 4 of Schedule 15.2</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PUNZ- Some forward estimates are not replaced by permanent estimates in R14</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. There are good processes in place implemented by the Field Services and the Switching Team. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. Audit risk rating low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A new improved process has been put in place to reduce the number of affected sites		01/11/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will continue to review R14 accuracy to identify process problems in order to improve our existing processes.		01/06/2021	

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Nov-19</p> <p>To: 30-Sep-20</p>	<p>PPPP - Historical estimates target not met for revision 3 for one NSP</p> <p>PUNZ - Historical estimates target not met for revision 3, 7, and 14 for 4 months</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple time</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate, non-compliance with R3 is and 7 is small (volumes are ever decreasing). More detective controls need to be designed. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have identified the common scenarios that lead to data being incorrectly recorded at the R14 submission stage (mostly, switch reads, and meter change information not being correctly captured by Cobra) and have already implemented new processes to catch and correct these cases.		01/04/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will continue to review R14 accuracy to identify process problems to improve our existing processes.		01/06/2021	

Recommendations

Description	Recommendation	Audited party comment	Remedial action
A source name (file reference) of metering data is not visible on a screen	PPPP - Store the name of the source against each meter reading as a reference	Pulse agrees that this is an area that Pulse can improve on.	Pulse will work with ABSL to add a source file name reference against meter reads that received.

Description	Recommendation	Audited party comment	Remedial action
Distributors assigned embedded generation to 18 ICPs but no Import/ Export meter installed	PUNZ - To contact networks to confirm if embedded generation for 18 ICPs was connected to their network	A new process will be created to notify field service team and reconciliation team of embedded generation.	Pulse is looking to create a daily or weekly process to monitor and identify embedded generation changes.
The profile RPS PV1 is assigned to an ICP one day after the switch event date.	PUNZ - Enhance a process of assigning PV1 or EG1 profile to installation with embedded generation after a switch is finalised.	Pulse will re-assess the current process of handling profile change.	Pulse will redesign the process to ensure compliance requirements are fulfilled.

Description	Recommendation	Audited party comment	Remedial action
Possibility of incorrect multiplier applied, and no volumes submitted for Aniwhenua Barrage local services	PUNZ - Audit metering installation for ICP 1000023001BP357	Pulse has contacted the MEP of 1000023001BP357 and confirmed a field visit to the site in 2 weeks.	Pulse will assign AccuCal or other capable MEP for the site and then correct the multiplier for the site.

Issues

Description	Issue	Remedial action
Meter data provided by AMCI, FCLM, and EDM I (EIEP3 format) is rounded	PUNZ - Meter data provided by AMCI, FCLM, and EDM I (EIEP3 format) is rounded therefore it results in technical breach for Pulse Energy	Pulse will engage with AMCI, FCLM, and EDM I to find out if they can deliver meter read data before rounding.