

Compliance plan for Pulse Energy Alliance LP

Title: Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 1-Sep-2017</p> <p>To: 18-Jul-2018</p>	<p>Pulse</p> <p>Discrepancies between Gentrack and the Registry.</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: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as weak for Pulse as they are not sufficient to mitigate the risk of discrepancies between Gentrack and the registry most of the time. It is expected that the level of control will improve once the new processes to monitor exceptions are implemented.</p> <p>The impact is assessed to be medium. The data inconsistencies for status, and reconciliation report aggregation factors do have an impact on market settlement. Some checks in place for reconciliation lessen the impact of the issues, such as identifying ICPs with inactive consumption prior to submission so that their status can be updated.</p>	
Actions taken to resolve the issue		Completion date
Pulse has a process and reporting to monitor status discrepancies. This will be implemented as a daily report for corrective action. MEP nomination will be included in the report.		3/09/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		3/09/2018
		Identified

Title: Provision of information			
Non-compliance		Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 15.35</p> <p>From: January 2018 and April 2018</p>		<p>Pulse</p> <p>Two breaches were recorded for late provision of submission information.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</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		The controls are assessed to be moderate and the impact low, based on the EA's decision to decline to pursue the breaches without warning.	
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Breach 1 was due to a combination of computer network speed and missing volume (due to null register content codes). Reconciliation system relocated on network, database re-indexed resulting in batch runtime reduced by 28 hours.</p> <p>Breach 2 was due to failure of forward estimate due to daylight savings effect on meter read timestamps in data warehouse and time taken to recalculate forward estimate volumes. New meter readings are set with time more than one hour away from midnight.</p>		Prior to Audit	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continuous efforts undertaken to improve process speed of existing system, and improve data quality within Gentrack estimation system for future implementation.		Ongoing	

Title: Audit trails			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clause 21 Schedule 15.2</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p>Pulse</p> <p>HHR and NSP volume audit trails do not contain all the required information and are not stored with the meter data.</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 rated as moderate because they will mitigate the risk most of the time, but there is room for errors to occur.</p> <p>Original data is retained and archived. Audit trail data meeting the requirements is retained or can be derived but is not available in the prescribed format or location. Pulse currently submits data for 12 HHR ICPs and one NSP, and missing data and corrections are relatively rare.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The HHR reconciliation process used by Property Power is being migrated across to Pulse. Once the migration is complete, all HHR submissions will be made using the John Candy Consulting software, with the exception of Aniwhenua NSP, which is manually compiled from SCADA data.		1/09/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
On transfer from CPPL to PUNZ, the great majority of CPPL's half-hourly reconciled ICPs will be switched to NHH reconciliation. This is expected to minimise the future requirement for estimation/modification of HHR data.		01/09/2018	
Future HHR submissions from PUNZ will use the 'Viper' tool provided by John Candy Consulting, with its audit trail.			

Title: Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 15-Sep-17</p> <p>To: 01-Jun-18</p>	<p><u>Pulse</u></p> <p>22 reconnections had expired certification recorded on the registry when they were reconnected.</p> <p><u>Property Power</u></p> <p>One ICP was not certified within five business days of electrical connection on the registry.</p> <p>Potential impact: Low</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>Certification is an MEP responsibility, and for some of the non-compliant ICPs it appears the information the MEP has recorded on the registry is incorrect.</p> <p>Controls are rated as weak because Pulse does not have processes in place to ensure meters are certified before the ICP becomes active. The impact is low because a small number of ICPs are affected, and it is likely that in some cases the certification details on the registry are incorrect.</p>	
Actions taken to resolve the issue		Completion date
Pulse will follow up with the MEPs with the expired recorded certifications and request for corrective action and possible site visit for recertification.		28/09/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Pulse will review Gentrack 4 capabilities to populate metering certification and expiry date to assist with future reporting and monitoring or implement additional reporting.		31/01/2019
		Identified

Title: Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p>Pulse 489 late updates to active status and 115 late updates to inactive status. 1647 late MEP nominations.</p> <p>Property Power 22 late updates to active status and three late updates to inactive status.</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	<p>Controls are rated as weak because system related issues for Pulse led to large numbers of backdated updates.</p> <p>The audit risk rating is assessed to be low overall:</p> <ul style="list-style-type: none"> there is a minor impact on invoicing for some ICPs and on other traders if ICPs switch out with the incorrect status there is a minor impact on MEPs because they cannot update the registry until they are nominated there is an impact on reconciliation submissions because ICPs are excluded if inactive and included if active, however status differences are expected to be corrected, and volumes will be washed up through the revision process. 	
Actions taken to resolve the issue		Completion date
<p>Pulse has resolved a few Gentrack issues where status update and MEP nomination were not generating files to update the Registry.</p> <p>MEP nomination have been corrected.</p>		31/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Pulse has a process and reporting to monitor status discrepancies. This will be implemented weekly as a report for corrective action. MEP nomination will be included to the report.</p> <p>Pulse will continue monitoring MEP Nominations for potential system issues.</p>		3/09/2018
		Identified

Title: Provision of information to the registry manager		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: 01-Nov-2017 To: 03-Apr-2018</p>	<p>Pulse</p> <p>44 late updates to active.</p> <p>Property Power</p> <p>One late update to active.</p> <p>Potential impact: Low Actual impact: Unknown Audit history: Multiple times Controls: Weak Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak because system related issues for Pulse led to large numbers of backdated updates, and Property Power did not have a clear process for new connections.</p> <p>The audit risk rating is assessed to be low overall:</p> <ul style="list-style-type: none"> there is a minor impact on invoicing for some ICPs and on other traders if ICPs switch out with the incorrect status there is an impact on reconciliation submissions because ICPs are excluded if inactive and included if active, however status differences are expected to be corrected, and volumes will be washed up through the revision process. 	
Actions taken to resolve the issue		Completion date
Pulse has resolved the Gentrack issues where the system was not sending complete data to the registry to claim the ICP, update the status to 1,12 or 2,0 and nominate a MEP.		31/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Pulse places a priority on accuracy of Registry data ahead of timeliness of status updates. On occasion, this trade-off is required. Our objective is to reduce the number of events requiring backdated updates.</p> <p>Pulse has a process and reporting tools to monitor Registry ICP status discrepancies. This will be implemented as a daily report for corrective action.</p>		10/08/2018
		Identified

Title: ANZSIC codes			
Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: Clause 9 (1(k)) of Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 18-Jun-18</p>	<p><u>Pulse</u></p> <p>Two ICPs had unknown ANZSIC codes.</p> <p>Two ICPs had incorrect ANZSIC codes recorded.</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 is room for improvement.</p> <p>The audit risk rating is low, because the unknown ANZSIC codes have been corrected and a small proportion of the sample were found to be incorrect.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse will review the customer sign-up process and system capability to remove ANZSIC T99 as an option.		28/09/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse has a process and reporting to monitor Registry ICP ANZSIC code discrepancies. This will be implemented as a weekly reporting for corrective action.		3/09/2018	

Title: Management of "active" status	
Non-compliance	Description
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p><u>Pulse</u></p> <p>Two ICPs had incorrect active dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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 these appear to be manual data entry errors and most updates were correct.</p> <p>The impact is rated as low because a small number of ICPs were affected and the incorrect dates will have a small impact on settlement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has corrected these incorrect active dates.		27/07/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse has a process and reporting to monitor Registry ICP status discrepancies. This will be implemented as a daily report for corrective action.		3/09/2018	

Title: Management of “inactive” status	
Non-compliance	Description
<p>Audit Ref: 3.9</p> <p>With: Clause 19</p> <p>Schedule 11.1</p> <p>From: 01-Sep-17</p> <p>To: 11-Jun-18</p>	<p><u>Pulse</u></p> <p>15 ICPs have incorrect statuses or status reason codes recorded on the registry.</p> <p>Five ICPs with consumption while disconnected did not have their status updated to active.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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 these appear to be manual data entry errors and most updates were correct.</p> <p>The impact is rated as low:</p> <ul style="list-style-type: none"> other participants may be affected if an ICP switches with an incorrect disconnected status. there is an impact on reconciliation where incorrect status dates are applied or an ICP has an inactive status recorded but should be active. In most cases identified the reason rather than status code is affected, and the ICP will be treated correctly for reconciliation.

Actions taken to resolve the issue	Completion date	Remedial action status
Pulse has corrected these incorrect active dates.	27/07/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse has a process and reporting to monitor Registry ICP status discrepancies. This will be implemented as a daily report for corrective action.	03/09/2018	

Title: Inform registry of switch request for ICPs - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 2 Schedule 11.3</p> <p>From: 10-Aug-17 To: 01-Sep-17</p>	<p><u>Property Power</u></p> <p>An NT was issued more than two days after pre-conditions were cleared for one Property Power ICP.</p> <p>Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because a late switch move NT was also identified. The impact was assessed to be low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Property Power has not issued any new NTs since June 2018, and will not issue any more – all new customers are directed to PUNZ.	01/07/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
All new customers are directed to PUNZ, and will fall under PUNZ's stronger controls.	01/07/2018	

Title: Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 11-May-18</p> <p>To: 29-May-18</p>	<p>Pulse</p> <p>Two incorrect AN response codes were applied by Pulse.</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 rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>Two AN response codes were applied incorrectly. Both should have had the AD (advanced metering) code applied, and information confirming the ICPs had advanced metering was available on the registry.</p>	
Actions taken to resolve the issue		Completion date
Training document has been compiled and given to team to refer to as a guideline.		25/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Further refresher training will be provided to the Switching Team.		31/08/2018
		Identified

Title: Losing 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: 09-Nov-17 To: 20-Apr-18</p>	<p>Pulse</p> <p>18 transfer CS files had incorrect estimated daily consumption recorded.</p> <p>Property Power</p> <p>Three transfer CS files had incorrect estimated daily consumption recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</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, because a system issue resulted in incorrect estimated daily consumption for some Pulse CS files. The controls on estimated daily consumption for Property Power half hour ICPs are also weak.</p> <p>The potential impact will vary depending on the kWh difference, and whether the gaining retailer creates forward estimates for reconciliation or billing based on the estimated daily consumption provided in the CS file.</p>	
Actions taken to resolve the issue		Completion date
Issue has been raised with Gentrack to look into the incorrect estimated daily consumption that is being produced on some CS files.		TBC after meeting on 27/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Improvement has been made for the 0 estimated daily consumption ICPs to capture the true daily consumption value by credit noting the last invoice where the final bill is for 0 or 1 day. This will calculate the daily average from the last bill date to the final bill date.		17/07/2018
This improvement in process is in place now. CPPL's remaining ICPs will be switched out within the next month, either to PUNZ or other retailers. The AN and CS files will be manually checked against an "expected" level calculated beforehand.		31/08/2018
		Investigating

Title: Retailers must use same reading - standard switch			
Non-compliance		Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 6(1) and 6A Schedule 11.3</p> <p>From: 10-Jan-18</p> <p>To: 16-Jan-18</p>		<p><u>Pulse</u></p> <p>18 late RR files for transfer switches.</p> <p>Four RRs were not supported by two validated actual reads.</p> <p>Issues relating to treatment of RR, switch in readings and estimated switch readings prevent Pulse from using the same reading as the other trader for settlement in some cases.</p> <p><u>Property Power</u></p> <p>One late AC file for a transfer switch.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating		Rationale for audit risk rating	
Medium		<p>The controls are rated as weak overall, due to the system issues affecting application of switch readings.</p> <p>The impact on reconciliation is assessed to medium based on the volume of switches in and out completed during the audit period.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Issue has been raised for Gentrack to provide us the correct steps to update an install read on Gentrack after an ICP has been through a start read change process.</p> <p>Billing are in the process of compiling a training document to capture the above processes and hand this over to Switching.</p> <p>Switching is taking this process over to ensure a tighter control is placed around this process.</p>		TBC after meeting on 27/07/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>All commissioned CPPL ICPs will be switched out by the end of August, so its processes will no longer pose a breach risk.</p> <p>Switching to take over process after training documents are completed and the process is handed over by Billing</p> <p>All commissioned CPPL ICPs will be switched out by the end of August, so its processes will no longer pose a breach risk.</p>		31/08/2018	

Title: Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.7</p> <p>With: Clause 9 Schedule 11.3</p> <p>From: 10-Aug-17 To: 01-Sep-17</p>	<p><u>Property Power</u></p> <p>An NT was issued more than two days after pre-conditions were cleared for one ICP.</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	The controls are rated as moderate because a late transfer NT was also identified. The impact was assessed to be low.	
Actions taken to resolve the issue		Completion date
CPPL - Same as reported in Section 4.1		31/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
CPPL - Same as reported in Section 4.1		31/08/2018
		Identified

Title: Losing trader provides information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.8</p> <p>With: Clause 10(1) Schedule 11.3</p> <p>From: 14-Nov-17 To: 09-Jun-18</p>	<p><u>Pulse</u></p> <p>One incorrect AN response code was applied.</p> <p>Pulse proposed an event date before the gaining trader's requested date for one switch move. The switch was later completed with a compliant event date.</p> <p><u>Property Power</u></p> <p>One incorrect AN response code was applied.</p> <p>One AN file was late.</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 rated as moderate overall as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> two AN response codes were incorrectly applied, but the metering type could be determined by the other participant from other information recorded on the registry the early proposed event date occurred due to human error and the switch was completed with a compliant date One AN file was late, however Property Power made up a small proportion of the AN files issued. 	
Actions taken to resolve the issue		Completion date
Training document has been compiled and given to the switching team to refer to as a guideline		25/07/2018
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Further refresher training will be provided to the Switching Team.</p> <p>CPPL is preparing to switch out all its ICPs before the end of August. These switches are planned and prepared in advance, and every reasonable step will be taken to ensure compliance. Thereafter, CPPL's processes will no longer pose any future breach risk.</p>	31/08/2018	

Title: Losing trader determines a different date - switch move			
Non-compliance	Description		
<p>Audit Ref: 4.9</p> <p>With: Clause 10(2) Schedule 11.3</p> <p>From: 14-Nov-17 To: 17-Nov-17</p>	<p>Pulse</p> <p>Pulse proposed an event date before the gaining trader's requested date for one switch move. The switch was later completed with a compliant event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong, because this appears to be an isolated error.</p> <p>The impact is assessed to be low. The early proposed event date occurred due to human error and the switch was completed with a compliant date.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Strong controls already exist around this process, however, refresher training has been scheduled with the Switching Team to go over AN requirements for the 31/07/2018.		31/07/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Further refresher training will be provided to the Switching Team.		31/08/2018	

Title: 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: 01-Sep-17 To: 18-Jul-18</p>	<p><u>Pulse</u></p> <p>27 switch move CS files had incorrect estimated daily consumption recorded.</p> <p>Two ICPs had readings which did not relate to the last day the ICP was supplied by Pulse. Pulse switches ICPs on the last read billed to a customer.</p> <p><u>Property Power</u></p> <p>Five switch move CS files had incorrect estimated daily consumption recorded.</p> <p>Two Property Power CS files were late.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</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, because a system issue resulted in incorrect estimated daily consumption for some Pulse CS files, and Pulse's process for switching vacant sites is non-compliant. The controls over estimated daily consumption for Property Power half hour ICPs are also weak.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> For incorrect estimated daily consumption, the potential impact will vary depending on the kWh difference, and whether the gaining retailer creates forward estimates for reconciliation or billing based on the estimated daily consumption provided in the CS file. For the incorrect switch reads, there will be an impact on the customer and the gaining retailer. Both will be billed for any vacant consumption that occurred while the ICP was supplied by Pulse. Vacant ICPs are usually expected to have low consumption, but the impact may be higher where a customer has moved in during the period of vacancy and not signed up with Pulse. The late CS files provided by Property Power will have a minor impact on the customer and gaining trader.

Actions taken to resolve the issue	Completion date	Remedial action status
Incorrectly calculated daily estimated consumption has been raised and is being looked into by Gentrack to provide a solution CS file read has also been raised with Gentrack to make a change to software	TBC after meeting with GT on 26/07/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Fix Gentrack software to capture the correct read in the CS file.	TBC after meeting with GT on 26/07/2018	

Title: Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>From: 10-Jan-18 To: 16-Jan-18</p>	<p><u>Pulse</u></p> <p>12 late RR files for switch moves.</p> <p>One RR contained an incorrect reading and was rejected and re-requested with the correct reading.</p> <p>Issues relating to treatment of RR, switch in readings and estimated switch readings prevent Pulse from using the same reading as the other trader for settlement in some cases.</p> <p><u>Property Power</u></p> <p>One late AC file for a switch move.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>The controls are rated as weak overall, due to the system issues affecting application of switch readings.</p> <p>The impact on reconciliation is assessed to medium based on the volume of switches in and out completed during the audit period. The late files have a minor impact on the customer and other participants.</p> <p>The RR with an incorrect reading had a low impact because it was rejected and reissued with correct readings.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Refer Section 4.4	Refer Section 4.4	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refer Section 4.4	Refer Section 4.4	

Title: Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
<p>Audit Ref: 4.12</p> <p>With: Clause 14</p> <p>Schedule 11.3</p> <p>From: 30-Nov-17</p> <p>To: 30-Nov-17</p>	<p>Pulse</p> <p>One switch move had a HH NT issued in error. The switch was withdrawn and re-requested as a switch move.</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>Controls are rated as strong; a system fix has been implemented to prevent recurrence of this issue.</p> <p>The impact is low because only one switch was affected, and it was corrected through the withdrawal process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Withdrawal had been completed to correct and resolve this issue.	12/03/2018	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Gentrack has queues that picks up sign ups that have had the NT sent as HH. This queue is now checked daily and the issue is resolved before the NT request hits the registry.	12/03/2018	

Title: Gaining trader to advise the registry manager - gaining trader switch			
Non-compliance	Description		
<p>Audit Ref: 4.14</p> <p>With: Clause 16 Schedule 11.3</p> <p>From: 06-Apr-18 To: 17-Apr-18</p>	<p><u>Pulse</u></p> <p>One late HH CS file.</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>At the time of the non-compliance controls were rated as weak; the CS was delayed because procedures were not in place for HH switching. Controls are strong now that the HH switching process has been confirmed.</p> <p>The impact was low because the CS file was provided one business day late.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Process confirmed and site was switched in on the registry as soon as this happened		17/04/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process has been clarified and the Switching Team have been trained on this.		30/04/2018	

Title: Withdrawal of switch requests			
Non-compliance	Description		
<p>Audit Ref: 4.15</p> <p>With: Clauses 17 and 18 Schedule 11.3</p> <p>From: 03-Jan-18 To: 10-Jul-18</p>	<p><u>Pulse</u></p> <p>48 late NW files; at least nine of which were issued in error.</p> <p><u>Property Power</u></p> <p>One late NW and one late AW.</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 rated as moderate, as they are sufficient to prevent most errors but there is room for improvement.</p> <p>The impact is assessed to be low:</p> <ul style="list-style-type: none"> the NWs issued in error have no impact, because Pulse is the only participant affected a small proportion of NWs were issued late. 		
Actions taken to resolve the issue		Completion date	Remedial action status
Training documents have been created to ensure simple checks are done before initiating a withdrawal to resolve issues around NWs issued in error.		25/07/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Refresher training has been scheduled for the Switching Team around withdrawals</p> <p>All customers are to be switched to PUNZ, and will fall under PUNZ's stronger controls.</p>		<p>7/08/2018</p> <p>31/08/2018</p>	

Title: Maintaining shared unmetered load			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 11.14</p> <p>From: 20-Nov-17</p> <p>To: 18-Jul-18</p>	<p>Pulse</p> <p>Two ICPs with shared unmetered load had missing trader unmetered load details in Gentrack and on the registry.</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 because there is room for improvement. The unmetered load has been updated on the registry for both ICPs. The audit risk rating is low; there is a minor impact on billing and settlement. Consumption is expected to be corrected and washed up.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has corrected the incorrect unmetered load		31/07/2018	

Preventative actions taken to ensure no further issues will occur	Completion date	Cleared
Pulse is implementing a report to monitor unmetered load details	28/09/2018	

Title: Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13 and Clause 15.2</p> <p>From: 01-Sep-17</p> <p>To: 13-Feb-18</p>	<p><u>Pulse</u></p> <p>Energy is not metered and quantified according to the code where meters are bridged.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong. Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons.</p> <p>The impact as rated as low, because only three bridged meters were identified, and all were unbridged within one month.</p>	
Actions taken to resolve the issue		Remedial action status
Pulse will follow up on the identified issues where meters are identified as being bridged.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will provide refresher to the relevant team to adjust consumption that occurred during the bridged period.	3/08/2018	

Title: Derivation of meter readings		
Non-compliance	Description	
<p>Audit Ref: 6.6</p> <p>With: Clause 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p><u>Pulse</u></p> <p>Meter condition information provided by Wells is not routinely reviewed.</p> <p>Seven customer and photo reads were treated as validated, when they had not been validated against at least two actual reads from other sources.</p> <p><u>Property Power</u></p> <p>Meter condition information provided by Wells is not routinely reviewed.</p> <p>Potential impact: Low</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>The controls are rated as weak, because they are not sufficient to ensure that meter condition information provided by Wells is reviewed and acted upon. There are insufficient controls to prevent photo and customer reads which have not been appropriately validated from being treated as validated readings for Pulse.</p> <p>There is a low impact for Pulse as a small number of events identified by Wells have not been actioned, and some unvalidated reads are being treated as validated for switching and reconciliation processes.</p> <p>There is no impact for Property Power, no meter condition issues have been identified by Wells during the audit period.</p>	
Actions taken to resolve the issue		Remedial action status
Pulse has processed the missing seal report from Wells. Customer will be notified, and job will be issued for corrective action.		17/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Pulse has advised Wells to report meter condition to the Field Services team email rather than to a direct person.		26/07/2018

Title: Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p><u>Property Power</u></p> <p>Three ICPs were unread during the period of supply. Exceptional circumstances did not apply and the best endeavours requirement was not met.</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 moderate as they will ensure that most ICPs will receive a read during the period of supply. Some residual risk remains for ICPs with short periods of supply.</p> <p>The impact is low, because only three ICPs without an actual read during the period of supply were identified.</p>	
Actions taken to resolve the issue		Completion date
Refer below		01/09/2018
Preventative actions taken to ensure no further issues will occur		Completion date
All commissioned CPPL ICPs will be switched out by the end of August, so its processes will no longer pose a breach risk.		01/09/2018
		Identified

Title: NHH meters interrogated annually			
Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: April 2018</p>	<p><u>Pulse</u></p> <p>For nine ICPs without an actual read for 12 months, exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met.</p> <p><u>Property Power</u></p> <p>Some meter reading frequency reports were submitted late.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls for Pulse were weak to none for October to April 2018 and are now rated as weak. I expect that the controls will improve to moderate once the backlog of unread ICPs have been worked through.</p> <p>Controls are weak for Property Power because submission of the reports is not scheduled to ensure they are submitted on time.</p> <p>The impact is low for Pulse and Property Power, because overall read attainment rates are high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has controls put in place and will be working through the backlogs starting from the oldest and arranging site visit to gain actual reads. Communications to the customers have been attempted.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process improvement is ongoing. All commissioned CPPL ICPs will be switched out by the end of August, so its processes will no longer pose a breach risk.		Ongoing	

Title: NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: April 2018</p>	<p>Pulse</p> <p>For five ICPs without an actual read for 12 months, exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met.</p> <p>Potential impact: Low</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 were weak to none for October to April 2018 and are now rated as weak. I expect that the controls will improve to moderate once the backlog of unread ICPs have been worked through.</p> <p>The impact is low, because overall read attainment rates are high.</p>	
Actions taken to resolve the issue		Completion date
<p>Pulse has controls put in place and will be working through the backlogs starting from the oldest and arranging site visit to gain actual reads. Communications to the customers have been attempted.</p> <p>Process improvement is ongoing.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Pulse has a weekly report to monitor and process to attain validated reads.</p>		02/07/2018

Title: Correction of NHH meter readings		
Non-compliance	Description	
<p>Audit Ref: 8.1</p> <p>With: Clause 19(1) Schedule 15.2</p> <p>From: 01-Sep-17 To: 18-Jul-18</p>	<p>Pulse</p> <p>Two corrections for defective meters were not processed using the reads provided by revenue assurance.</p> <p>One correction for a multiplier was not backdated to the correct date in Cobra. The multiplier is now correctly backdated.</p> <p>Five corrections for inactive ICPs with consumption had not been processed.</p> <p>Three bridged meters did not have corrections processed.</p> <p>One unmetered load correction was not processed accurately.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</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. There have been delays in both identifying ICPs requiring correction, and processing corrections.</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
Pulse will follow up on the identified issues and process accordingly for corrections.		10/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Pulse will review process with relevant teams to identify the breakdown of the workflow.		31/08/2018

Title: Identification of readings			
Non-compliance	Description		
<p>Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2</p> <p>From: 01-Sep-17 To: 18-Jul-18</p>	<p>Pulse</p> <p>Seven customer and photo reads were treated as validated, when they had not been validated against at least two actual reads from other sources.</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 assessed to be moderate and the impact is assessed to be low.</p> <p>The number of customer reads not validated against actual reads is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse will review the process and include further validations to ensure customer reads are validated against two actual reads from other sources.		28/09/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As above.</p> <p>Where customer (or any) readings present negative consumption or material update volume ($\geq 150\%$), Cobra presents a validation error. These are manually reviewed by the Reconciliation Team, and marked as ignored where they do not match adjacent readings. We believe this to be a stronger control than presented during the audit.</p>		28/09/2018	

Title: Electronic meter readings and estimated readings		
Non-compliance	Description	
<p>Audit Ref: 9.6</p> <p>With: Clause 17 Schedule 15.2</p> <p>From: 01-Sep-17 To: 18-Jul-18</p>	<p><u>Pulse</u> Meter event information is not obtained and reviewed for all MEPs.</p> <p><u>Property Power</u> Meter event information is not obtained and reviewed for all MEPs.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Weak Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak as they are insufficient to mitigate risk of non-compliance.</p> <p>The risk rating is low because most issues should be identified through Pulse and Property Power'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
Pulse will initiate a reporting requirement to collate all meter event information from MEPs to generate a regular report for monitoring and processing.		28/02/2019
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		28/02/2019

Title: HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
<p>Audit Ref: 11.4 With: Clause 15.8</p> <p>From: 01-Sep-17 To: 18-Jul-18</p>	<p><u>Pulse</u> HHR aggregates files do not contain electricity supplied information.</p> <p><u>Property Power</u> HHR aggregates files do not contain electricity supplied information.</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	The issue relating to content of the aggregates file is an error in the code, Pulse and Property Power are providing submission information as expected.	
Actions taken to resolve the issue		Completion date
Pulse support a change of the Code to better reflect the submission information rather than electricity supplied.		-
Preventative actions taken to ensure no further issues will occur		Completion date
An option could be to submit the aggregate volume one month later (as it is invoiced to the customer after the trading month has ended), however Pulse will continue to provide information based on aggregation of HHR load and generation volumes for the trading month.		-
		Identified

Title: Creation of submission information			
Non-compliance	Description		
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: January 2018 and April 2018</p>	<p>Pulse</p> <p>Two breaches were recorded for late provision of submission information.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</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	The controls are assessed to be moderate and the impact low, based on the EA's decision to decline to pursue the breaches without warning.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have improved the speed of the NHH reconciliation system by 4.5x, resulting in greater time available to check and re-run submissions ahead of day 4 and day 13. In addition, additional checks are placed on the data supplied to the system.</p> <p>We continue to improve the quality of the base reconciliation data populated in Gentrack so that eventually it may be used for NZX submission generation.</p>		Apr 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continuous improvement		Ongoing	

Title: Grid connected generation			
Non-compliance	Description		
<p>Audit Ref: 12.6</p> <p>With: Clause 15.11</p> <p>From: April 2018</p>	<p>Pulse</p> <p>A breach was recorded for late provision of submission information.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</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	The controls are assessed to be moderate and the impact low, based on the EA's decision to decline to pursue the breach without warning.		
Actions taken to resolve the issue		Completion date	Remedial action status
NSP volume file(s) are now submitted ahead of NHH and HHR files where an issue is found with other files. This reduces the impact on the Reconciliation Manager and other parties.		05/07/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Speed of submission process is enhanced, allowing greater time to review and correct submission information. Where file upload issues occur, other files are transmitted prior to addressing file upload issues.		05/07/2018	

Title: Accuracy of submission information	
Non-compliance	Description
<p>Audit Ref: 12.7</p> <p>With: Clause 15.12</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p><u>Pulse</u></p> <p>Some submission information was inaccurate.</p> <p><u>Property Power</u></p> <p>Submission information for one ICP was inaccurate in the initial submission.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>Controls are rated as weak because they will not consistently mitigate the risk of inaccurate submission. I note that Pulse has acted to investigate and resolve errors once they are identified, and has enlisted the help of JCC.</p> <p>The potential impact is assessed to be high, because the issues could have a major impact on settlement outcomes. These issues have already received management attention, and Pulse's corrective actions have reduced this risk to medium. Revised volumes will be submitted using the revision process.</p>

<p>implementation of GT4's MENOTIFY system and at the same time as FCLM re-sets its LINE network metering, non-settled registers are being populated within Gentrack. These are being marked as "Not for settlement, Invoicing or Market". However the settlement details for "unchanged" meters are not verified (at this time). This is part of an ongoing data quality process.</p> <p>UML</p> <p>John Candy Consulting's RM Tool will be used for the comparison of unmetered load at ICP level for each submission starting with July 2018 initial.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
Treatment of readings	Ongoing	
Pulse is reviewing its import of NSP map data from external sources, and is considering use of the LIS file for NSP mapping of relevant NSPs, networks and reconciliation types.		
Status codes	Ongoing	
Pulse continues to update registry when it finds consumption on de-energised sites. This has been prioritised.		
Daylight Savings	April 2018	
All future NHH meter readings following this event have midday set as the reading time.		
The errant readings are marked as deleted in Cobra.		
January day 13 submission	01/02/2018	
NHH submission volumes were found to be below expected levels for the day 13 submission revision periods. Computer network issues delayed processing, resulting in late discovery of the volume shortfall.		
A decision to re-submit prior revisions was undertaken, however this was after the deadline. John Candy Consulting was subsequently brought in to improve the accuracy of NHH submission data.		
RR integration		
The RR readings are currently applied at invoice rather than register. We are investigating options to collect and store accepted RR's in the data warehouse to make them available for reconciliation.	ETA 28/02/2018	
Submission Flag		

<p>The submission flag in registry is in the process of being verified inside the Gentrack database. Prior to GT4, GT3.8 held no settlement indicator data. Registers that were not marked for submission were not billed. Since the implementation of GT4's MENOTIFY system and at the same time as FCLM re-sets its LINE network metering, non-settled registers are being populated within Gentrack. These are marked as "Not for settlement, Invoicing or Market" in Gentrack, however the settlement details for "unchanged" meters are not verified (at this time). This information is to be updated and validated as part of an ongoing data quality process.</p> <p>UML</p> <p>Unmetered load has been added to the ICP level submission review process</p>	<p>31/07/2018</p>	
	<p>30/07/2018</p>	

Title: Permanence of meter readings for reconciliation			
Non-compliance	Description		
<p>Audit Ref: 12.8</p> <p>With: Clause 4</p> <p>Schedule 15.2</p> <p>From: 01-Sep-17</p> <p>To: 18-Jul-18</p>	<p>Pulse</p> <p>Some estimates are not replaced by revision 14.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Medium</p>	<p>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. Some scenarios are consistently treated incorrectly by Cobra.</p> <p>The audit risk rating is assessed to be medium. Total forward estimate across the three months reviewed was 917,943 kWh and may differ from the actual consumption for the affected ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The Cobra permanent estimation process has not been tested due to lack of historic processed data.</p>		<p>refer below</p>	<p>Investigating</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will test the permanent estimate process in Cobra.	ETA 28/02/2018	

Title: Forward estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From:</p> <p>Property Power March 2017 (r1, r3, r7 and r14).</p> <p>Pulse April 2017 (r1), May 2017 (r1, r3 and r7), Jan 2018 (r1 and r3)</p>	<p><u>Pulse</u></p> <p>The accuracy threshold was not met for all months and revisions.</p> <p><u>Property Power</u></p> <p>The accuracy threshold was not met for all months and revisions.</p> <p>Potential impact: High</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, as there is room for improvement.</p> <p>Initial data is replaced with revised data and washed up. A small number of submissions had differences over the threshold.</p>	
Actions taken to resolve the issue		Completion date
<p>For Pulse, NHH submission volumes greater than 15,000kWh per register are reviewed individually to confirm consistency against readings.</p> <p>Property Power ICPs will switch to Pulse, eliminating future initial submissions.</p>		<p>in Place</p> <p>01/08/2018</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Pulse does not apply seasonal profile shape to initial NHH volume submissions and is likely to experience future submission variance from initial base on;</p> <ul style="list-style-type: none"> - Seasonal profile shape (irrigation areas) - High growth (delay in setup of customers) 		Ongoing
		Identified

Title: Historical estimate reporting to RM		
Non-compliance	Description	
<p>Audit Ref: 13.3</p> <p>With: Clause 10 of Schedule 15.3</p> <p>From: Nov 16-Jan 17 (r14), Jul 17-Aug 17 (r7)</p>	<p>Pulse</p> <p>Historic estimate thresholds were not met for some revisions.</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 as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>Pulse was close to the target in all cases.</p>	
Actions taken to resolve the issue		Completion date
Pulse has improved its historic estimate rate, largely due to smart meter uptake and the timing of its submission process since the introduction of Cobra.		30/09/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Pulse intends to implement an automatic NHH permanent estimate process in the Cobra NHH reconciliation system. This is scheduled for testing prior to the end of the current certification period.		30/09/2018
		Identified