

Compliance plan for Pulse – February 2023

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 01-Apr-22 To: 22-Dec-22	PUNZ Some registry and submission information incorrect and not updated as soon as practicable. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as moderate overall but there is room for improvement, specifically in relation to the management of inactive vacant consumption and correction of submission information for defective and bridged meters. The audit risk rating is assessed to be medium based on the kWh of under submission detailed above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal Meetings and meetings with Gentrack to discuss the issues and put a plan in place to rectify the issues above and put in preventative measures.	21/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Audit report to be checked weekly and monthly compliance meetings will be started to monitor compliance tasks across the business	ongoing	

Electrical Connection of Point of Connection	
Non-compliance	Description
Audit Ref: 2.11 With: Clause 10.33A From: 08-Jun-22 To: 04-Oct-22	16 reconnections were not certified within five business days of electrical connection. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate

	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement because notification is not always sent to the service request inbox for reconnections.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Multiple trainings have been carried out with agents due to previous audits however this process is user dependent which is resulting in the process not being followed.		21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We will investigate the creation of an Automated report from the system on a bi-weekly/weekly basis to resolve this issue.		31/3/23	

Meter bridging	
Non-compliance	Description
<p>Audit Ref: 2.17</p> <p>With: Clause 2A of Schedule 15.2</p> <p>From: 10-Mar-21</p> <p>To: 07-Oct-22</p>	<p>PUNZ</p> <p>14 ICPs with bridged meters had no correction processed.</p> <p>Two ICPs with bridged meters had corrections processed in Gentrack but not in Cobra.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</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>The controls are recorded as weak as they do not ensure that estimated consumption during the bridged period is consistently captured and reported for reconciliation.</p> <p>The impact on settlement is expected to be medium based on Pulse's average of one to two bridged meters per week, and that corrections had not been processed for reconciliation for any of the eight ICPs checked.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.	21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Bridged meter correction process needs to be reviewed for Field Services Pulse will conduct an end to end process review on the Bridged meter process.	31/3/23	

Provision of information on dispute resolution scheme		
Non-compliance	Description	
Audit Ref: 2.19 With: Clause 11.30A From: 01-Apr-22 To: 22-Dec-22	PUNZ Information on Utilities Disputes is not provided on some addressed customer communications including vacant letters, overdue balance letters and planned outage letters or as part of the email footer for outbound emails. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak because information on Utilities Disputes is not provided on all addressed customer communications as required. The impact is low because information is provided on Utilities Disputes monthly with the customer's invoice.	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse will review its communications and add UDL information where required.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will provide training to Marketing team to make sure information about UDL is present on all communications. We will update our standard customer communication letterhead template to include UDL.	31/03/2023	

Provision of information on electricity plan comparison site			
Non-compliance		Description	
Audit Ref: 2.20 With: Clause 11.30B From: 01-Apr-22 To: 22-Dec-22		PUNZ Clear and prominent information on Powerswitch is not provided on addressed customer communications regarding price and service changes. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as weak because information on Powerswitch is not provided on all addressed customer communications as required. The impact is low because information is provided monthly with the customer's invoice.	
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse have added this information into our latest Price change process for 01 April 2023		1/4/23	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse have added this information into our latest Price change process for 01 April 2023. Pulse will provide training to Marketing team to make sure information about UDL is present on all communications. We will update our standard customer communication letterhead template to include UDL.		12/02/2023	

Changes to registry information	
Non-compliance	Description
Audit Ref: 3.3 With: Clause 10 Schedule 11.1 From: 01-Apr-22	PUNZ 42 late updates to active status. 15 late updates to inactive status. 1,107 late trader updates. 11 ANZSIC code updates more than 20 business days after initial electrical connection or switch in. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate

To: 18-Oct-22	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate overall. The percentage of status updates on time is very high, and many of the late updates were backdated corrections which improve accuracy.</p> <p>The impact on settlement outcomes is low, because Cobra's processes ensure that correct profiles are applied for submission for distributed generation ICPs, and the late status updates occurred in time for revision 14.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Profile updates have been automated. Submission Type change process has been reviewed. Meetings to discuss the issues and put a plan in place to rectify the issues above and put in preventative measures.		21/2/23	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Audit report to be checked weekly and monthly compliance meetings will be started to monitor compliance tasks across the business.		1/3/23	

Provision of information to the registry manager	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: Clause 9 of schedule 11.1</p> <p>From: 29-Nov-21</p> <p>To:14-Oct-22</p>	<p>27 late updates to active status for new connections.</p> <p>27 late MEP nominations for new connections.</p> <p>0110013066EL253 was initially electrically connected from 1 July 2022 but the active status event date is 19 May 2022.</p> <p>1000608282PC360 was initially electrically connected from 13 September 2022 but the active status event date is 15 July 2022.</p> <p>1100000044WMF02, was initially electrically connected from 7 December 2021 but the active status event date is still 29 November 2021.</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	The controls are recorded as moderate because most updates were on time and correct, but improved processes would result in better compliance.

	The updates were made in time for revised submission information to be provided through the wash up process, and most updates are accurate.	
Actions taken to resolve the issue	Completion date	Remedial action status
Meetings to discuss the issues and put a plan in place to rectify the issues above and put in preventative measures.	21/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Audit report to be checked weekly and monthly compliance meetings will be started to monitor compliance tasks across the business.	8/3/23	

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: 9 (1(k) Schedule 11.1 From: 13-Oct-22 To:19-Dec-22	PUNZ Three ICPs had unknown ANZSIC codes and were corrected during the audit. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because most ANZSIC codes were found to be accurate, but validation requires improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will include the AC020 report when doing analysis on ANZIC codes	31/3/23	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We will update the ANZSIC code process	31/3/23	

Management of "active" status		
Non-compliance	Description	
<p>Audit Ref: 3.8</p> <p>With: Clause 17 Schedule 11.1</p> <p>From: 29-Nov-21</p> <p>To: 13-Sep-22</p>	<p>PUNZ</p> <p>0000288550WT5FD was reconnected on 10 August 2022 but recorded as reconnected on 15 August 2022 on the registry.</p> <p>0110013066EL253 was initially electrically connected from 1 July 2022 but the active status event date is 19 May 2022.</p> <p>1000608282PC360 was initially electrically connected from 13 September 2022 but the active status event date is 15 July 2022.</p> <p>1100000044WMF02, was initially electrically connected from 7 December 2021 but the active status event date is still 29 November 2021.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because most updates were on time and correct, but improved processes would result in better compliance.</p> <p>Revised submission information will be provided through the wash up process once corrections are made. Most of the status updates checked were accurate.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>New Connections - Network application received, awaiting customer acceptance before forwarding acceptance to the network. Emailed network to reverse PUNZ as Proposed Trader.</p> <p>Reconnections – Training has previously been provided to agents however due to a high volume of actions being taken human error has occurred.</p>	21/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Audit report to be checked weekly and monthly compliance meetings will be started to monitor compliance tasks across the business.	Ongoing	

Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Apr-22</p> <p>To:12-Oct-22</p>	<p>PUNZ</p> <p>0000452073WE2B1 was disconnected on 17 August 2022 but the inactive status event date is 16 August 2022.</p> <p>0001341715ALE7A which was disconnected at the pillar on 12 October 2022 but had the 1,10 electrically disconnected at meter box fuse reason code applied.</p> <p>0000018318NTE35 which was disconnected at the pole fuse on 25 July 2022 but had the 1,5 reconciled elsewhere reason code applied. It was corrected to 1,8 electrically disconnected at pole fuse during the audit.</p> <p>Incorrect status for two ICPs with consumption while inactive resulting in under submission of 5,755 kWh.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because most updates were on time and correct, but improved processes would result in better compliance.</p> <p>Revised submission information will be provided through the wash up process once corrections are made. There is a small impact on settlement for the ICP incorrectly recorded as inactive, and a very minor impact on ICP days submissions.</p>	
Actions taken to resolve the issue		Completion date
<p>Pulse will review options with Gentrack through the Reconciliation project.</p> <p>Pulse will review No Reads and Zero consumption process to ensure data flow into reconciliation.</p>		21/2/23
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Pulse will review options with Gentrack through the Reconciliation project.</p> <p>Pulse will review No Reads and Zero consumption process to ensure data flow into reconciliation.</p>		31/3/23
		Investigating

Losing trader response to switch request and event dates- standard switch		
Non-compliance	Description	
Audit Ref: 4.2 With: Clauses 3 and 4 of schedule 11.3 From: 09-Apr-22 To: 13-Oct-22	PUNZ 11 of the 3,745 transfer ANs checked had incorrect AN response codes. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because correct codes are applied unless the ICP technical details have changed and not been updated in Gentrack, or a user has manually entered an incorrect AN response code. The impact is low because there is no impact on settlement, and information on ICP status, unmetered load and metering is available to the other trader on the registry.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have raised this issue with our system provider (Gentrack) who are currently reviewing.	21/3/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will review options with Gentrack through the Reconciliation project.	Ongoing	

Losing trader must provide final information- standard switch	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 5 Schedule 11.3 From: 31-Aug-22 To: 21-Sep-22	PUNZ Gentrack is configured to calculate the average daily consumption from the last two readings, rather than the last two actual validated readings. One CS file had an incorrect average daily kWh. Two CS files had incorrect last actual read dates. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because most switch file content is correct. Data is only incorrect in certain circumstances including when the last two readings are not actual, the last read type is not actual, there is not a reading on the last day of supply, or the ICP has had invoices reversed and rebilled. Pulse intends to upgrade Gentrack which should help to resolve the CS content issues.</p> <p>The impact on settlement and participants is estimated to be minor based on the number of exceptions identified, and the kWh difference between applied and expected reads where it could be calculated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have raised this with our system provider (Gentrack) to confirm the logic is correct for CS files.		21/3/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will review options with Gentrack through the Reconciliation project.		Ongoing	

Retailers must use same reading- standard switch	
Non-compliance	Description
<p>Audit Ref: 4.4 With: 6(1) and 6A Schedule 11.3</p> <p>From: 20-Sep-22 To: 20-Sep-22</p>	<p>PUNZ</p> <p>One RR breach.</p> <p>RRs for 0000034273EA2F7 22 April 2022, 0001270280TG72C 5 May 2022, 1000014460BP9AF 27 June 2022 and 1000017736BP1CB 14 April 2022 were recorded with estimated RR readings, which should have been actual.</p> <p>The agreed switch reads for 0006693539RN78B 2 May 2022, 0001270280TG72C 5 May 2022, 0000015548EACB4 14 June 2022, 1000014460BP9AF 27 June 2022, 1000017736BP1CB 14 April 2022 and 0003303660BU43B 9 August 2022 were recorded with an actual read type in Cobra but should have been recorded with an estimated read type.</p> <p>The agreed switch reads for 0000964071TUED0 24 June 2022 were recorded as actual in Gentrack and Cobra but should have been estimated.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are recorded as moderate because estimated switch event readings are not consistently recorded with the correct read type in Cobra, and Gentrack's RR files default the read type to actual. Almost all RR files were on time.</p>

	<p>The impact is low:</p> <ul style="list-style-type: none"> • the correct read types are recorded in the CS file for most CS files checked, • the correct read types are recorded in Gentrack for all ICPs checked, • all switch event reads are correctly treated as permanent by the historic estimate calculation process, so there is no impact on submission volumes, and • the late file was issued in time for corrected submission information to be provided through the wash up process. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Gentrack switch read type for RR files has now been updated. We are working internally with our DBA to ensure the correct RR read type is stored in Cobra.	21/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Gentrack switch read type for RR files has now been updated. We are working internally with our DBA to ensure the correct RR read type is stored in Cobra.	8/3/23	

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: 07-Sep-22</p> <p>To: 07-Sep-22</p>	<p>PUNZ</p> <p>One switch move NT was issued more than two business days after pre-conditions were cleared.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are strong because NT files are usually issued on time, the exception occurred because an NT was not reissued after a withdrawal was completed.</p> <p>The is a minor impact on the customer, and other trader. The switch was completed in time for revised submission information to be provided through the wash up process.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Meeting to discuss process and put in preventative measures.	21/2/23	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
Pulse to complete a refresher training with their Care department about re-signing post a withdrawal.	8/3/23

Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 27-Jun-22 To: 17-Aug-22	PUNZ Three of the 1,894 switch move ANs checked had incorrect AN response codes. One ET breach. One E2 breach. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because: <ul style="list-style-type: none"> correct codes are applied unless the ICP technical details have changed and not been updated in Gentrack, or a user has manually entered an incorrect AN response code, the ET breach was caused by a manual data entry error, and the E2 breach appears to have been caused by an event date generated by Gentrack, but only affected one file. The impact is low because: <ul style="list-style-type: none"> the incorrect AN codes have no impact on settlement, and information on ICP status and metering is available to the other trader on the registry, the ET breach switch was later withdrawn, and the E2 breach was two days early. 	
Actions taken to resolve the issue	Completion date	Remedial action status
We have raised this issue with our system provider (Gentrack) who are currently reviewing.	21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will review options with Gentrack through the Reconciliation project.	Ongoing	

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: 04-Jun-22</p> <p>To: 08-Oct-22</p>	<p>PUNZ</p> <p>Gentrack is configured to calculate the average daily consumption from the last two readings, rather than the last two actual validated readings.</p> <p>Five CS files had an incorrect average daily kWh.</p> <p>Eight CS files had incorrect last actual read dates.</p> <p>Three CS files had incorrect switch event read types.</p> <p>Five CS files had switch event reads which did not reflect the actual reading or best estimate reading on the last day of supply.</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>The controls are recorded as moderate because most switch file content is correct. Data is only incorrect in certain circumstances including when the last two readings are not actual, the last read type is not actual, there is not a reading on the last day of supply, or the ICP has had invoices reversed and rebilled. Pulse intends to upgrade Gentrack which should help to resolve the CS content issues.</p> <p>The impact on settlement and participants is estimated to be minor based on the number of exceptions identified, and the kWh difference between applied and expected reads where it could be calculated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have raised this issue with our system provider (Gentrack) to confirm the CS logic is correct.		31/3/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will review options with Gentrack through the Reconciliation project.		Ongoing	

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: 18-Apr-22</p> <p>To:18-Oct-22</p>	<p>PUNZ</p> <p>Two RR breaches.</p> <p>The RRs for 0151673020LC497 24 June 2022 and 0668498897LC33B 8 August 2022 were recorded with estimated readings, which should have been actual because they were based on an actual reading provided by the MEP for the event date.</p> <p>The agreed switch readings for 0000510309NR832 10 June 2022, 0000784771NV2CB 18 April 2022, 0011237010ELDBD 6 May 2022, 0000050307NTDD3 27 August 2022, 0007205558RN93C 7 April 2022, 0151673020LC497 24 June 2022, 0316990272LC8D9 10 June 2022 and 0668498897LC33B 8 August 2022 were recorded as actual in Cobra but should have been recorded as estimated.</p> <p>The agreed switch readings for 0000179775UNB83 14 April 2022 and 0000385110HB3F1 6 May 2022 were incorrectly recorded as actual in Gentrack and Cobra but should have been estimated. The read type was mis-keyed on entry into Gentrack.</p> <p>The agreed switch readings for 0000011460HR6FC 7 July 2022 and 0000037491DE606 9 May 2022 had incorrect read types recorded in Cobra. 0000011460HR6FC had an actual read recorded as an estimate and 0000037491DE606 had an estimated read recorded as an actual.</p> <p>The agreed switch readings for outgoing CS files for 0000040662DEE0F (8 October 2022), 0052029380WMC03 (23 September 2022) and 0000484225CE8F5 (1 August 2022) were not correctly recorded in Gentrack and Cobra.</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>The controls are recorded as moderate because estimated switch event readings are not consistently recorded with the correct read type in Cobra, and Gentrack's RR files default the read type to actual. Almost all RR files were on time.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> the correct read types are recorded in the CS file for most CS files checked, the correct read types are recorded in Gentrack for all ICPs checked, all switch event reads are correctly treated as permanent by the historic estimate calculation process, so there is no impact on submission volumes, and the late file was issued in time for corrected submission information to be provided through the wash up process. 	
Actions taken to resolve the issue	Completion date	Remedial action status
RR read type issue fixed in the current version of GT.	20/2/23	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
Monthly compliance meetings will be started to monitor compliance tasks across the business.	Ongoing

Gaining trader informs registry of switch request - gaining trader switch		
Non-compliance	Description	
Audit Ref: 4.12 With: Clause 14 Schedule 11.3 From: 02-Aug-22 To:02-Aug-22	PUNZ One HH NT was issued two business days late. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, and the impact is low, because Pulse confirmed the process and issued the file within two business days of the due date.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.	21/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
HH switch training to be carried out end to end. GT to be tested/set up for HHR switching.	31/3/23	

Withdrawal of switch requests			
Non-compliance	Description		
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: 23-Jun-22 To: 17-Oct-22	PUNZ Three SR breaches. 15 NA breaches. 0000000389CP26D (22 August 2022), 0009923096WWB24 (22 August 2022) and 0032780114PCEE2 (4 October 2022) had the DF (date failed) NW advisory code incorrectly applied. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because most of the files were issued on time and their content was accurate. The impact is low because: <ul style="list-style-type: none"> the files with the DF code applied did have non-compliant event dates, but those dates were not ten business days in the future as required by the registry functional specification, and the late files were issued in time for corrected submission information to be provided through the wash up process. 		
Actions taken to resolve the issue		Completion date	Remedial action status
Training completed on NWDF.		21/2/23	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training completed on NWDF.		Date 21/2/23	

Metering information	
Non-compliance	Description
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 11-Jul-22	Five CS files contained event readings which did not reflect the actual reading or best estimate of actual consumption at the end of the last day of supply. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate

To: 08-Oct-22	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate overall as most switch event readings reflected the actual reading or best estimate for the last day of supply.</p> <p>The audit risk rating is assessed to be low as the incorrect information in the CS files will have a minor effect on the other trader. The agreed switch readings were applied for reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We have raised this issue with our system provider (Gentrack) to confirm the CS logic is correct.		21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will review options with Gentrack through the Reconciliation project.		Ongoing	

Electricity conveyed & notification by embedded generators	
Non-compliance	Description
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 10-Mar-21</p> <p>To: 07-Oct-22</p>	<p>PUNZ</p> <p>ICP 0005504181ML99B does not have metering recorded in the registry, there is no MEP nomination for a different MEP and billing and settlement is not occurring.</p> <p>16 ICPs with distributed generation have RPS profile recorded on the registry but should have RPS PV1. Eight were corrected during the audit and eight ICPs¹ still had incorrect profiles assigned on 2 January 2022.</p> <p>At least five² and up to 26 ICPs with distributed generation do not have settled I flow registers installed.</p> <p>Volumes were not quantified in accordance with the code for 40 ICPs with bridged meters.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>

¹ 1000512028PC9FC, 1000545283PC224, 0000001364CEEAB, 0000090798WW726, 0000010069EAF81, 0081096808PC673, 1000593522PC0ED and 0000442111WEC21.

² 0449707032LCBF6 (PV install 27 January 2017), 0000036718DEFBE (PV install 26 May 2015), 0457047038LCF3D (PV install 25 May 2016), 0003576011EL13F (PV install 20 December 2021) and 0044251413PC427 (PV install 10 September 2020).

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak overall:</p> <ul style="list-style-type: none"> • the Gentrack process to update profiles for distributed generation ICPs is not consistently working as expected, and exceptions are not identified and resolved as soon as practicable, • ICP 0005504181ML99B had been active with no metering installed since 26 March 2021, and • processes for meter bridging ensure that meters are only bridged where urgent reconnection is required, and it is not possible to reconnect without bridging the meter. <p>The audit risk rating is assessed to be low overall:</p> <ul style="list-style-type: none"> • correct profiles are applied for reconciliation for the distributed generation ICPs, • ICP 0005504181ML99B is domestic and likely to have low consumption, and • there is a process to estimate consumption during bridged meters, but it is not consistently operating as expected. 		
Actions taken to resolve the issue		Completion date	Remedial action status
We have worked with GT to automate the process. This has been tested and released to production. We will continue to monitor and report on this and work with Gentrack if there are any gaps.		15/2/23	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Automation of these tasks by GT and Monthly compliance meetings will be started to monitor compliance tasks across the business.		Ongoing	

Derivation of meter readings	
Non-compliance	Description
<p>Audit Ref: 6.6 With: Clauses 3(1), 3(2) and 5 Schedule 15.2 From: 01-Apr-22 To:12-Oct-22</p>	<p>Meter condition information not reviewed, or investigations undertaken during the audit period. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate as Wells does complete the onsite checks and provides the required meter condition information to Pulse and where a safety issue is identified then Wells will report this separately and directly to Pulse for immediate action.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Wells Broken Seal and Meter Condition report is reviewed as received.		21/2/23	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monthly compliance meetings will be started to monitor compliance tasks across the business.		Ongoing	

Interrogate meters once			
Non-compliance	Description		
<p>Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Apr-22 To:12-Oct-22</p>	<p>Exceptional circumstances were not proven for all ICPs not read during period of supply.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as none as the process to manage this has been paused.</p> <p>The audit risk rating is assessed to be low as the overall percentage read is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No Reads Project currently on hold Pulse will review process.		2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Audit report to be checked weekly and Monthly compliance meetings will be started to monitor compliance tasks across the business.		Ongoing	

NHH meters interrogated annually			
Non-compliance		Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 01-Apr-22 To:12-Oct-22		Exceptional circumstances were not proven for the ten ICPs sampled. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as none as the process to manage this has been paused. The audit risk rating is assessed to be low as the overall percentage read is high.	
Actions taken to resolve the issue		Completion date	Remedial action status
No Reads Project currently on hold Pulse will review process.		2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Audit report to be checked weekly and Monthly compliance meetings will be started to monitor compliance tasks across the business.		Ongoing	

NHH meters 90% read rate			
Non-compliance		Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 01-Apr-22 To:12-Oct-22		Exceptional circumstances not confirmed for ICPs identified for 11 NSPs that did not meet the 90% read rate within four months. Potential impact: Medium Actual impact: Low Audit history: Once previously Controls: None Breach risk rating: 5	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as none as the process to manage this has been paused. The audit risk rating is assessed to be low as the overall read attainment read rate is high.	
Actions taken to resolve the issue		Completion date	Remedial action status
No Reads Project currently on hold Pulse will review process.		2023	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
Audit report to be checked weekly and Monthly compliance meetings will be started to monitor compliance tasks across the business.	Ongoing

Identification of readings		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 3(3) Schedule 15.2</p> <p>From: 14-Apr-22</p> <p>To: 27-Aug-22</p>	<p>PUNZ</p> <p>Three CS files had customer reads incorrectly classified as actual reads.</p> <p>Six RR files had actual reads incorrectly classified as estimated reads.</p> <p>15 estimated switch event reads were incorrectly classified as actual reads in Cobra.</p> <p>One actual switch event read was recorded as an estimate in Cobra.</p> <p>Three estimated switch event reads were recorded as actual in Gentrack and Cobra.</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 recorded as moderate because estimated switch event readings are not consistently recorded with the correct read type in Cobra, and Gentrack's RR files default the read type to actual.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> the correct read types are recorded in the CS file for most CS files checked, the correct read types are recorded in Gentrack for all ICPs checked, and all switch event reads are correctly treated as permanent by the historic estimate calculation process, so there is no impact on submission volumes. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Care agent training required on how to enter reads into GT. Reads from Gentrack and Prada are imported as actual reads into Cobra.	21/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will review the current process and work on this with our DBA. We will test this in Gentrack and make sure it is correct in Gentrack.	31/3/23	

Meter data used to derive volume information			
Non-compliance		Description	
Audit Ref: 9.3 With: Clause 3(5) Schedule 15.2 From: 01-Apr-22 To:12-Oct-22		EDM & AMS (AMCI) provides HHR interval data for some ICPs rounded to two decimal places prior to June 2022. NHH readings are truncated when imported into Gentrack. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as moderate as the NHH reads are truncated when imported into Gentrack. The audit risk rating is low, because only NHH meter readings provided with decimal places are affected.	
Actions taken to resolve the issue		Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.		21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Monthly compliance meetings will be started to monitor compliance tasks across the business.		Ongoing	

Half hour estimates	
Non-compliance	Description
Audit Ref: 9.4 With: Clause 15 Schedule 15.2 From: 01-Apr-22 To:12-Oct-22	HHR estimates across meter changes for two ICPs not including volume from removed meter between last midnight read and removal read. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because while estimates are created, they are not always the correct treatment for addressing interval data gaps.</p> <p>The impact is assessed to be low due to the small number of affected ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
PUNZ are working on a way to improve the calculation of these volumes in COBRA. We have raise this with Gentrack		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse's existing estimation processes to be reviewed and work on this with Gentrack in the Reconciliation Project		Ongoing	

NHH metering information data validation			
Non-compliance	Description		
<p>Audit Ref: 9.5</p> <p>With: Clause 16 Schedule 15.2</p> <p>From: 01-Apr-22</p> <p>To:12-Oct-22</p>	<p>Zero consumption is not being monitored.</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: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as the available zero-consumption monitoring report has not been monitored since July 2022.</p> <p>The audit risk rating is assessed to be low, as the number of ICPs likely to be affected is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Meeting to discuss thresholds and meeting with Gentrack to discuss their policies		21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse's existing processes to be reviewed and thresholds will be reviewed.		8/3/23	

Electronic meter readings and estimated readings			
Non-compliance		Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Apr-22 To:12-Oct-22		AMI Event logs not reviewed. Potential impact: Medium Actual impact: Unknown Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as weak as AMI event logs are not reviewed. The audit risk rating is assessed to be low, as the number of ICPs likely to be affected is small.	
Actions taken to resolve the issue		Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.		21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will speak to MEPs to ensure we receive logs from all MEPs. We will work with Gentrack to understand how their system processes event logs and how they send notifications to the MEPs if there are anomalies in the data.		8/3/23	

Creation of submission information	
Non-compliance	Description
Audit Ref: 12.2 With: Clause 15.4	<p>PUNZ</p> <p>14 ICPs with bridged meters had no correction processed.</p> <p>Two ICPs with bridged meters had corrections (8,790 kWh) processed in Gentrack, but not in Cobra.</p> <p>Two ICPs were missing from submissions due to status not being corrected for inactive vacant consumption resulting in 5,755 kWh.</p> <p>Corrected volumes were not submitted for two ICPs (0001725239BU6A3 – NHH, 0099552502CNF6D – HHR) with defective meters.</p> <p>ICP 0000018303EACE3 had a multiplier correction (x3 updated to x1) back to 2015 resulting in some volume information (2,122 kWh) not being included in the revision process.</p> <p>HHR Initial submission files for April 2022 was provided late to the Reconciliation Manager.</p>

From: 10-Mar-21 To: 07-Oct-22	Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as weak as the process in place does not ensure that consumption during bridged periods is calculated and is submitted. The audit risk rating is assessed to be medium based on the kWh detailed above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures. 0001725239BU6A3 - has been corrected	21/3/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will review current process Bridged meter correction process needs to be reviewed for Field Services Pulse will conduct an end to end process review on the Bridged meter process.	8/3/23	

Allocation of submission information	
Non-compliance	Description
Audit Ref: 12.3 With: Clause 15.5 From: 01-Apr-22 To:12-Oct-22	Some estimates of consumption using previous months consumption volumes are manually applied as Historic Estimate volumes to the aggregated AV-080 file. Potential impact: Low Actual impact: Low Audit history: none Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating
Low	The controls are moderate as some final corrections are not applied at the earliest opportunity. The impact is low based on the volume differences identified.

Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.	23/2/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse's existing processes to be reviewed and we will review options with Gentrack through the Reconciliation project. We will monitor this in monthly compliance meetings.	8/3/2023	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 01-Apr-22 To:12-Oct-22	Some submission data was inaccurate and was not corrected at the next available opportunity. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are rated as weak as not all corrections are being processed. The impact is assessed to be medium based on the identified kWh identified.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.	31/3/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>PUNZ will review the process where "corrections are only processed if the volume difference is 200 kWh or greater".</p> <p>Bridged meter correction process needs to be reviewed for Field Services</p> <p>Pulse will conduct an end to end process review on the Bridged meter process.</p> <p>Inactive Consumption process to be reviewed.</p> <p>Audit report to be checked weekly and Monthly compliance meetings will be started to monitor compliance tasks across the business.</p>	Ongoing	
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Permanence of meter readings for reconciliation		
Non-compliance	Description	
<p>Audit Ref: 12.8</p> <p>With: Clause 4 Schedule 15.2</p> <p>From: April to May 2021 r14</p>	<p>PUNZ</p> <p>Some estimates were not replaced with permanent estimates by revision 14.</p> <p>Permanent estimates applied when reasonable endeavours were not used to obtain an actual reading for a sample of ten ICPs.</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 recorded as moderate as they will mitigate risk to an acceptable level.</p> <p>The audit risk rating is low as while the forward estimate remaining at r14 is low, the volume of forward estimate volume being converted to historic estimate volumes using permanent estimate reads, but where reasonable endeavours was not shown, is high. While default estimates have been applied in Cobra and are now treated as permanent estimates it is unknown how accurate these are in relation to the expected consumption patterns for these ICPs.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Due to this process being a manual human input we believe there may have been instances of human error. PUNZ will review the permanent estimate process to have this completed on R7 to have more time to improve the overall accuracy. We will review Gentricks process moving forward.</p>	31/3/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Audit report to be checked weekly and Monthly compliance meetings will be started to monitor compliance tasks across the business.	Ongoing	
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Forward estimate process		
Non-compliance	Description	
Audit Ref: 12.12 With: Clause 6 Schedule 15.3 From: 01-Jan-21 To: 30-Jun-22	Some balancing area differences between revisions were over the $\pm 15\%$ threshold because of inaccurate forward estimates. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, as Pulse has forward estimate processes in place, however the default estimate value applied when reads are not available within the consumption month is lower than the average daily consumption across all of Pulse's ICPs. The audit risk rating is low because revised submission data will be washed up.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings and Meeting with Gentrack to discuss the issues and put a plan in place to rectify the issues above and preventative measures.	21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will create a process that compares the R0 reads to the average read volume for each meter. We will review and improve this with the new Gentrack system.	31/3/23	

Compulsory meter reading after profile change	
Non-compliance	Description
Audit Ref: 12.13 With: Clause 7 Schedule 15.3 From: 01-Apr-22 To: 12-Oct-22	Five changes of submission type and profile code change did not have a validated actual meter or permanent estimate reading applied for the date of the change. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>Controls are rated as strong as most profile changes occurred where a validated read is present.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Training was updated, this has now been updated and provided to relevant staff.	20/2/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Training was updated, this has now been updated and provided to relevant staff.</p> <p>Monthly compliance meetings will be started to monitor compliance tasks across the business.</p>	Ongoing	

Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.3 With: Clause 10 of Schedule 15.3 From: 01-Apr-22 To:12-Oct-22	The historic estimate attainment requirements were not met for some revisions. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as moderate as Pulse has not used reasonable endeavors to attempt to obtain reads prior to applying a permanent read. The audit risk rating is low as the volume of ICPs affected by this is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal Pulse meetings to discuss the issues and put a plan in place to rectify the issues above and preventative measures.	21/2/23	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Will be review/improved on new Gentrack system. Monthly compliance meetings will be started to monitor compliance tasks across the business.	Ongoing	