

Compliance plan for Pulse Energy Alliance RP 2024

Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: 01-Oct-23 To: 23-Jun-24	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 historic corrections. 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
We have resolved what we can during the Audit and we have gone through in more detail the actions we have taken in the specific sections. Incorrect profiles have been corrected but this is a work in progress, we are working with the MEP's and Networks and are improving our processes and reports. We are doing the same for ICps with distributed generation where this is incorrect in the registry. ICP 0001418644BU71C has been corrected. ICP 0005504181ML99B has been corrected. We will make sure all T99, including T994 ANSIC codes are monitored and corrected. ICP: 0000030682WE042 has been corrected.	1/8/24	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will kick off the monthly Internal Audit meeting and go through the area's where we are falling short. We will use the audit compliance report more thoroughly.	Ongoing	

Electrical Connection of Point of Connection for an ICP that is not an NSP			
Non-compliance		Description	
Audit Ref: 2.11 With: Clause 10.33A From: 10-Oct-23 To:15-Mar-24		22 were not certified within five days, five of a sample of five were not notified to the MEP. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are recorded as weak as no notifications are being sent to MEPs when ICPs are reconnected with expired metering. 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
Training issue identified and new refresher training has been supplied to our Customer facing teams that sign up new customers and lodge Reconnections		18/07/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue refresher training with Care and Sales teams.		Ongoing	

Non-compliance	Description	
Audit Ref: 2.19 With: Clause 11.30A From: 10-Oct-23 To:15-Mar-24	Information on Utilities Disputes is not provided in the chat channel. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as the messaging has been added to the chat channel. The audit risk rating is assessed to be low as it is being provided with the exception of the web chat channel.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have placed the Utilities Disputes Information in additional forms of communication.	23/7/24	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Our Marketing and disputes team will update future forms of communication with the Utilities Disputes information.	Ongoing	

Meter bridging		
Non-compliance	Description	
<p>Audit Ref: 2.17</p> <p>With: Clause 2A of Schedule 15.2</p> <p>From: 13-Mar-23</p> <p>To: 22-Jun-24</p>	<p>14 ICPs from the previous audit with bridged meters had no correction processed.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because the process is now well managed, but there are still some corrections to be conducted from the previous audit.</p> <p>The impact on settlement is expected to be medium based on the total number of bridged days of 500 across the 14 ICPs. At 25 kWh per day this is 12,500 kWh</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have calculated the consumption of bridged time periods and PUNZ have begun the internal processes to have these consumption values reflected in Gentrack. We have also begun the customer engagement.	21/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional training has been added around the use of the consumption calculator. Training has also been given on asking MEPs/Networks to have contractors clarify whether an unbridging of a meter or a relay has occurred.	21/07/2024	

Non-compliance	Description	
Audit Ref: 2.20 With: Clause 11.30B From: 10-Oct-23 To:15-Mar-24	Information on Powerswitch not provided on some price change letters. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate as the information is provided on all but one letter type. The audit risk rating is assessed to be low as it is being provided with the customer's invoice and is available on the website.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have placed the Powerswitch Information in additional forms of communication.	23/7/24	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our Marketing and disputes team will update future forms of communication with the Utilities Disputes information.	Ongoing	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 10-Oct-23</p> <p>To:15-Mar-24</p>	<p>86 late updates to “active” status.</p> <p>23 late updates to “inactive” status.</p> <p>447 late trader updates.</p> <p>31 ANZSIC code updates more than 20 business days after initial electrical connection or switch in.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are recorded as moderate. Pulse has made improvements with controls but there are still some improvement opportunities.</p> <p>The audit risk rating is assessed to be low as the overall volume of late updates has decreased since the last audit.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
ANZSIC - Sometimes Gentrack request was not send/acknowledged to Registry. Sometimes the issue is being overlooked until later, but PUNZ have been improving our processes to better monitor them.	1/8/24	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Have taken auditor’s advice after each audit and improved PUNZ’s ANZSIC report. The number of mismatches has been decreasing.	Ongoing	

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: 10-Oct-23</p> <p>To:15-Mar-24</p>	<p>43 (53.76%) late updates to “active” status for new connections.</p> <p>Three ICPs (1000028767BPDCA, 1002184581UNE18 and 0001116801BUBEE) with the incorrect first “active” date.</p> <p>29 late MEP nominations for new connections.</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 with room for improvement.</p> <p>The audit risk rating is assessed to be low as the number of ICPs affected is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Issues with sign up process identified and training corrected for Sales and Care agents	18/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training will continue ongoing and Process documents have been corrected.	Ongoing	

ANZSIC codes		
Non-compliance	Description	
Audit Ref: 3.6 With: 9 (1(k) Schedule 11.1 From: 10-Oct-23 To:15-Mar-24	24 (30%) of a sample of 80 ICPs with the incorrect ANZSIC codes applied. 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 to be moderate overall but there is room for improvement. The audit risk rating is assessed to be low as this has no direct impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
ANZSIC updated in Gentrack for most ICPs, some requires further confirmation with customer but will be updated eventually.	13/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Added BTS to PERM checks to ANZSIC process.	30/06/2024	

Changes to unmetered load		
Non-compliance	Description	
Audit Ref: 3.7 With: Clause 9 (1)(f) Schedule 11.1 From: 10-Oct-23 To:15-Mar-24	One ICP with the incorrect shared unmetered load recorded. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as the process is robust to manage discrepancies. The audit risk rating is assessed to be low as only one ICP was identified with the incorrect unmetered load, and this was corrected during the audit.	
Actions taken to resolve the issue	Completion date	Remedial action status
This has been corrected now.	1/7/24	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
This will be monitored at monthly meetings and these will be monitored in the non compliance report.	1/8/24	

Management of "active" status		
Non-compliance	Description	
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 10-Oct-23 To:15-Mar-24	Three ICPs (1000028767BPDCA, 1002184581UNE18 and 0001116801BUBEE) with the incorrect first "active" date. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate but there is room for improvement. The audit risk rating is assessed to be low as the number of incorrect "active" dates was small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal training has been completed to make sure that correct Active dates are being used	18/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue refresher training ongoing	ongoing	

Management of "inactive" status		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: 10-Oct-23 To:15-Mar-24	Two ICPs (0000009424NTC90 and 000093476WWFE4) of a sample of 20 reconnected ICPs checked incorrectly recorded as disconnected. Potential impact: Low Actual impact: Low Audit history: multiple times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for 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
Errors identified caused by human error, reiterated to team requirement for data accuracy at all times	18/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continued team refresher training sessions	ongoing	

Inform registry of switch request for ICPs - standard switch		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 of schedule 11.3 From: 10-Oct-23 To:15-Mar-24	Incorrect profile sent for all ICPs with distributed generation present. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate but there is room for improvement. The impact is low as the majority of NT files are sent with the correct profile code.	
Actions taken to resolve the issue	Completion date	Remedial action status
Query raised with GT team to check on the issue as we are unaware why this is getting created	10/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Query raised with GT team to check on the issue as we are unaware why this is getting created	10/07/2024	

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 of schedule 11.3</p> <p>From: 10-Oct-23</p> <p>To:15-Mar-24</p>	<p>Nine of the 3,366 transfer ANs checked had an incorrect AN response code.</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>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.</p> <p>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.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Communications between GT and registry checked to be ok and also as far as we are aware priorities are set correctly in GT. Training provided to team to select correct AN code when sending manually.</p>	10/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Query has been raised with Gentrack team to check further what is causing this issues and re-check AN hierarchy too.</p>	10/07/2024	

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: 10-Oct-23</p> <p>To:15-Mar-24</p>	<p>Two of a sample of five ICPs sent with an incorrect average daily consumption of zero.</p> <p>One CS file sent with a last actual read outside of the period of supply.</p> <p>Three E2 breaches</p> <p>54 CS breaches</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 as they mitigate risk most of the time but one area for improvement was identified.</p> <p>The audit risk rating is assessed to be low as the impact on settlement and participants is estimated to be minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
GSD-2185 has been raised with Gentrack to investigate on the CS file picking up incorrect last actual read and last actual read date.	16/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We are still investigating and working on the root cause of this issue to prevent this from happening.</p> <p>Training has been provided to team to use correct reads and date when finalising sites manually and within complaint timeframe.</p>	16/07/2024	

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: 10-Oct-23 To:15-Mar-24</p>	<p>Reads for the sample of six RRs checked of a possible 15 RR files sent were not correct in Gentrack.</p> <p>All agreed estimated switch reads were recorded with an actual read type in Cobra.</p> <p>Reads in Cobra did not match the AC file for three of a sample of ten ICPs checked.</p> <p>One RR breach.</p> <p>Estimated reads not used in Cobra for all five CS files sampled received with estimated start reads of a possible 355 CS files received with estimated readings.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</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>The controls are rated as weak as the process in place is not ensuring the reads are being correctly recorded in Gentrack or Cobra.</p> <p>The audit risk rating is assessed to be medium due to the number of potential ICPs affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Training for RR breach has been completed as non compliance was due to human error.</p> <p>We are investigating with our billing team and Gentrack to understand why the incorrect reading is displayed even though the correct reading is being sent to the registry and is on the customer invoice.</p> <p>Cobra - PUNZ has a script for Cobra to check for missing read date in Cobra and it will attempt to import actual reads from Prada instead. Then, when Gentrack reads are being validated in Cobra, Cobra prioritises the existing actual read from Prada over the estimate reads in Gentrack.</p>	16/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
RR reads are correctly sent and customers have been billed correctly- all information checked. We have raised this issue with our billing team who will work with Gentrack to resolve this issue.	16/07/2024	

Gaining trader informs registry of switch request - switch move		
Non-compliance	Description	
Audit Ref: 4.7 With: Clause 9 of schedule 11.3 From: 10-Oct-23 To:15-Mar-24	Incorrect profile sent for all ICPs with distributed generation present. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate but there is room for improvement. The impact is low as the majority of NT files are sent with the correct profile code.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have raised this with the Gentrack team to review and update logic in the system.	10/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We have raised this with the Gentrack team to review and update logic in the system. - GSD-2186	10/07/2024	

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: 10-Oct-23</p> <p>To:15-Mar-24</p>	<p>Four of the 39 switch move ANs checked had an incorrect AN response code.</p> <p>One AN breach.</p> <p>107 E2 breaches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate as they mitigate risk most of the time but one area for improvement was identified.</p> <p>The audit risk rating is assessed to be low as the number of ICPs sent with the incorrect AN code was small, but this is useful information for the gaining trader to have.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Communications between GT and registry checked to be ok and also as far as we are aware priorities are set correctly in GT.</p> <p>Training provided to team to select correct AN code when sending manually.</p> <p>Team training provided for E2 breaches and there should be no delays in files.</p>	10/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Query has been raised with Gentrack team to check further what is causing this issues and re-check AN hierarchy too.</p> <p>Continues refreshes and catch ups with team has made lot of improvements. Better report handling capacity in place to prevent breaches in future.</p>	10/07/2024	

Losing trader must provide final information - switch move		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: 10-Oct-23 To:15-Mar-24	One CS file with an incorrect average daily kWh. Five ICPs sent with the incorrect last read and read date. 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 as they mitigate risk most of the time but one area for improvement was identified. The audit risk rating is assessed to be low as the impact on settlement and participants is estimated to be minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Average daily consumption report has been fixed in April and ICPs now should have correct ADL value from GT during switch outs. Incorrect previous date and read issue is identified and being looked into.	10/07/2024	identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Query raised with Gentrack team to check on Incorrect previous date and read issue. GSD- 2185	10/07/2024	

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-Oct-23</p> <p>To:15-Mar-24</p>	<p>Reads for the sample of eight RRs checked of a possible 21 RR files sent were not correct in Gentrack.</p> <p>All agreed estimated switch reads were recorded with an actual read type in Cobra.</p> <p>Three RR breaches.</p> <p>One AC breach</p> <p>Estimated reads not used in Cobra for all five CS files sampled received with estimated start reads of a possible 435 CS files received with estimated readings.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</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>The controls are rated as weak as the process in place is not ensuring the start reads are being correctly recorded in Gentrack or Cobra.</p> <p>The audit risk rating is assessed to be medium due to the number of potential ICPs affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Incorrect/No RR reads in GT – All the sites are billed on correct RR start reads but it is just not showing up on consumption. I have emailed internal team to check of any issues.</p> <p>We have to send RR sometimes at later stage due to:</p> <p>Late actual reads gained</p> <p>Negotiating for long with retailers.</p> <p>AC breach was caused due to training/staff issues in October 2023.</p>	10/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Investigating on our end to ensure no future mis-matches occur.</p> <p>Ongoing training for team for RR/AC where required has been undertaken.</p>	10/07/2024	

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: 10-Oct-23</p> <p>To:15-Mar-24</p>	<p>Two of the three date failed NWs sampled were sent with the incorrect withdrawal reason.</p> <p>Nine SR breaches.</p> <p>54 NA breaches.</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>The controls are recorded as moderate as they mitigate risk to an acceptable level.</p> <p>The audit risk rating is assessed to be low as the impact on settlement and participants is estimated to be minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NWDF withdrawal – Training and information has been shared with team to use this code correctly.</p> <p>Nine SR breaches. - i think this could be for October 2023 month where we had staff/training issues.</p> <p>54 NA breaches. - sometimes we have to send NW at later stage when incorrect ICP/metering issue figured out to correct billing for our customer.</p>	10/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NWDF withdrawal – Training and information has been shared with team to use this code correctly.</p> <p>Staff/training issues sorted so all the NWs should be actioned on time.</p>	10/07/2024	

Metering information		
Non-compliance	Description	
Audit Ref: 4.16 With: Clause 21 Schedule 11.3 From: 10-Oct-23 To:15-Mar-24	Six CS files sent with the incorrect last read. Reads for the sample of 14 RRs checked of a possible 36 RR files sent were not correct in Gentrack. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the process in place is not ensuring the reads are being correctly recorded in Gentrack or Cobra. The audit risk rating is assessed to be low due to the small number of ICPs affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have raised a request with our Gentrack team GSD-2185 to investigate and correct what is causing this issue.	16/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We have raised a request with our Gentrack team GSD-2185 to investigate and correct what is causing this issue.	16/07/2024	

Switch saving protection			
Non-compliance	Description		
Audit Ref: 4.17 With: Clauses 11.15AA to 11.15AB From: 05-Oct-23 To:13-Dec-23	Attempt was made to win-back one customer. Potential impact: None Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as the process has been changed to be compliant. The audit risk rating is assessed to be low as this activity has ceased.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was from October 2023; our process has since changed, and we have removed the requirement for 30 day's notice. In terms of the highlighted account, customer had contacted to give 30 days' notice to avoid the Early Termination fees but at the same time we had already received the switch request from the other retailer. Before we changed the process, we used to ask customer to understand why they are leaving to collect the feedback but after Rebecca's suggestion from earlier this year, it's been stopped completely.		10/23	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We have changed our process as per your recommendation.		10/23	

Maintaining shared unmetered load		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 11.14 From: 26-Sep-23 To:15-Mar-24	One ICP with the incorrect shared unmetered load recorded. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong and will mitigate risk to an acceptable level. The audit risk rating is assessed to be low as over submission is very minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
This ICP has been resolved, will monitor UML in the monthly meeting and monitor UML in the non-compliance report.	1/7/24	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We will monitor UML in the monthly meeting and monitor UML in the non-compliance report	Going forward	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1 With: Clause 10.13</p> <p>From: 10-Oct-23 To: 23-Jun-24</p>	<p>36 ICPs with distributed generation have RPS profile recorded on the registry but should have RPS PV1. 18 were resolved during the audit.</p> <p>Nine HHR ICPs did not have a "EG" metering channel, therefore quantification was not occurring. Seven are still outstanding.</p> <p>Volumes were not quantified in accordance with the code for one ICP with a bridged meter.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The controls have been strengthened during the audit period and reporting is now in place.</p> <p>The impact on settlement and participants is minor because most of the ICPs are residential; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have raised these with the MEPs and the Network and are working to improve our processes and reports and make the process more streamline.	1/8/24	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will work more closely with the MEPs and Networks and improve our reporting in these areas. Weill will run our discrepancy reports more frequently.	Ongoing monitoring.	

NHH meter reading application		
Non-compliance	Description	
Audit Ref: 6.7 With: Clause 6 of Schedule 15.2 From: 10-Oct-23 To:15-Mar-24	Six CS files sent with the incorrect last read. Reads for the sample of 14 RRs checked of a possible 36 RR files sent were not correct in Gentrack. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the process in place is not ensuring the reads are being correctly recorded in Gentrack or Cobra. The audit risk rating is assessed to be low due to the small number of ICPs affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have raised a request with our Gentrack team GSD-2185 to investigate and correct what is causing this issue. Incorrect RR read recorded on consumption history is being looked into with our Billing and Gentrack teams.	16/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are investigating this internally and have raised a request with Gentrack to investigate and resolve this issue.	16/07/2024	

Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: 10-Oct-23 To:15-Mar-24	Exceptional circumstances were not proven for three of nine ICPs not read during period of supply. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, because reporting and processes are now in place for meter reading attainment. 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 Report is generated weekly and an automated contact process is now set up and soon to be running.	01/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing review of processes and continued team refresher training sessions	ongoing	

NHH meters interrogated annually		
Non-compliance	Description	
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: 10-Oct-23 To:15-Mar-24	Exceptional circumstances were not proven for eight of 20 ICPs sampled. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, because reporting and processes are now in place for meter reading attainment. 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 Report is generated weekly and an automated contact process is now set up and soon to be running.	01/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing review of processes and continued team refresher training sessions	ongoing	

NHH meters 90% read rate		
Non-compliance	Description	
Audit Ref: 6.10 With: Clause 9(1) and (2) Schedule 15.2 From: 10-Oct-23 To:15-Mar-24	Exceptional circumstances were not confirmed for two of three ICPs where the NSPs did not meet the 90% read rate within four months. Potential impact: Medium Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, because reporting and processes are now in place for meter reading attainment. 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 Report is generated weekly and an automated contact process is now set up and soon to be running.	01/08/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing review of processes and continued team refresher training sessions	ongoing	

Identification of readings		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 3(3) Schedule 15.2 From: 10-Oct-23 To:15-Mar-24	Estimated switch event reads are incorrectly classified as actual reads in Cobra. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because most switch file content is correct. Pulse is in the process of upgrading Gentrack which should help to resolve the CS content issues. The audit risk rating is assessed to be low as the impact on settlement and participants is estimated to be minor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Estimate switch reads are disregarded in Cobra, so we also add an actual read flag in Cobra, so they don't get ignored. We will look into ways to improve this. We have tested this in the Gentrack system, and this works correctly in Gentrack.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to monitor and look into ways to improve this. We will do further testing in Gentrack for this.	Ongoing	

Meter data used to derive volume information		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 3(5) Schedule 15.2 From: 01-Oct-23 To:23-Jun-24	NHH readings are truncated when imported into Gentrack. Potential impact: Low Actual impact: None 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
We receive the readings with decimal places, but they are truncated when they go into Gentrack. We are working with Gentrack to improve this.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are working with Gentrack, we have raised a jira, reference: GSD-2198	Ongoing	

Half hour estimates		
Non-compliance	Description	
<p>Audit Ref: 9.4</p> <p>With: Clause 15 Schedule 15.2</p> <p>From: 01-Oct-23 To:23-Jun-24</p>	<p>Estimations for C&I ICPs are conducted using the “flat line” methodology based on total kWh from the previous month. This does not meet the “reasonable endeavours” threshold.</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 while estimates are created, they are not always as accurate as they could be.</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 reasoning for using flat line methodology was so that it is easier for PUNZ to monitor which GXPs contain estimation data. PUNZ always aim to use actual HHR data for C&I TOU submission and will work with MEPS to ensure actual data is obtained as soon as possible so volumes are corrected in the next washup.	No changes until after Gentrack upgrade	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Currently has no plan to change the methodology until Gentrack upgrade.	After Gentrack upgrade	

Electricity supplied information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.3 With: Clause 15.7 From: 01-Aug-23 To: 23-Jun-24	Incorrect electricity supplied information. 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 they mitigate risk most of the time but there is room for 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
PUNZ identified some ICPs have incorrectly included both Network and Energy charges (resulting in twice the volume submitted), thus the BILLED volume is over-submitted. Further investigation showed that there is an error in one of the automated scripts which needs to be corrected.	10/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Changes are made to code/scripts so BILLED report will be correct moving forward.	11/06/2024	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2 With: Clause 15.4</p> <p>From: 26-Mar-21 To: 23-Jun-24</p>	<p>A revision was not conducted for a bridged meter, despite having obtained revised submission information, by way of knowledge that the ICP was bridged, and correction was required.</p> <p>14 ICPs with bridged meters during the previous audit period had no correction processed.</p> <p>Submission did not occur for ICP 0005504181ML99B for the period 26 March 2021 to 8 May 2024.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Three times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls were recorded as weak during the previous audit; however, they have improved in recent months and are now considered moderate for newly identified issues. The issues recorded are all historic and are in the process of being resolved.</p> <p>The audit risk rating is assessed to be medium based on the kWh detailed above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have resolved the missing readings for ICP 0005504181ML99B so going forward from the current R14 washup, volumes will be accounted for. Bridged meter training and processes have been improved.	1/7/24	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have improved processes and training for bridged meters and are currently working on historic incorrect bridged meter information. The readings will be fed into cobra so our submission information will be improved. We believe the unread and zero consumption reports will improve this going forward as well.	In progress.	

Allocation of submission information		
Non-compliance	Description	
Audit Ref: 12.3 With: Clause 15.5 From: 01-Dec-22 To:23-Jun-24	Some estimates of consumption using previous months consumption volumes are manually applied as Historic Estimate volumes to the aggregated AV-080 file. These should be labelled as FE. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are 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
This happens to ICPs which had reversal events in Registry during the Reconciliation Month. There are scripts to help mitigate the issue.	After Gentrack upgrade	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are working to resolve in the current system but will be addressed when PUNZ migrate to Gentrack system after the upgrade.	After Gentrack upgrade	

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 01-Oct-23 To:23-Jun-24	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
0005504181ML99B - Will be correct from May 2023 onwards. 0330297023LCFB9 - Corrected on NHH end in Cobra. PUNZ has a script for Cobra to check for missing read date in Cobra and it will attempt to import actual reads from Prada instead. When Gentrack reads are being validated in Cobra, Cobra prioritises the existing actual read from Prada over the estimate reads in Gentrack.	12/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Cobra uses actual reads over estimate reads from Gentrack. PUNZ relies on a script to extract reads from Prada where there are missing read date. After weighting the pros and cons, PUNZ will keep the script to ensure more actual reads are loaded into Cobra for accurate submission. We have added this to the Gentrack reconciliation migration project.	12/07/2024	

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: 01-Oct-23</p> <p>To: 23-Jun-24</p>	<p>Permanent estimates applied when reasonable endeavours were not used to obtain an actual reading for a sample of eight 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 the volume of forward estimate volume being converted to historic estimate volumes using permanent estimate reads is low, but where reasonable endeavours was not shown, the permanent estimates may not be accurate.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Before applying permanent estimate in R14, PUNZ also monitor for any CS/RR reads, as well as checking Prada and Gentrack for any meter reads which might have failed to import to Cobra to ensure the volume is as accurate as possible. PUNZ only treat an estimate read as permanent estimate if there are no other feasible method.	12/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
PUNZ will continue with the logic above when needing to apply permanent estimate in the future.	12/07/2024	

Forward estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.12</p> <p>With: Clause 6 Schedule 15.3</p> <p>From: 01-Sep-22</p> <p>To: 31-Mar-24</p>	<p>Some balancing area differences between revisions were over the $\pm 15\%$ threshold because of inaccurate forward estimates.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate, 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. Cobra has some other limitations with calculating revisions.</p> <p>The audit risk rating is low because revised submission data will be washed up.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Cobra lacks the capability to estimate volume on an ICP-by-ICP basis. Instead, it uses a flat daily estimate value for each meter type. This value is calculated by using the average consumption of all meters under that meter type. This method means that the forward estimate process will balance out for GXPs with large number of ICPs, but it will perform poorly for GXPs with small number of ICPs. We will test this thoroughly with the migration to Gentrack.</p>	12/07/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>ICP with forward estimates are monitored closely during R14 and PUNZ will load actual/more accurate reads into Cobra, and permanent estimate is applied if there isn't one. We will test this during the Gentrack reconciliation migration project.</p>	12/07/2024	

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: 01-Oct-22</p> <p>To:30-Nov-23</p>	<p>The historic estimate attainment requirements 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 recorded as moderate as Pulse has not used reasonable endeavours to attempt to obtain reads prior to applying a permanent read.</p> <p>The audit risk rating is low as the volume of ICPs affected by this is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The numbers above are showing a sign of improvements compared to PUNZ's results from a few audits ago. PUNZ will continue to monitor and develop scripts/process to help bring the HE requirements to as high as possible.	12/07/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are always looking to improve our processes in Cobra. PUNZ plans to resolve this once Gentrack system has been upgraded. We have added this to the testing of the Gentrack reconciliation migration project.	12/07/2024	