

Compliance plan for Pulse Energy Alliance LP

Title: Relevant information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.6, 11.2, 15.2 From: entire audit period	Discrepancies between Gentrack and the Registry. 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 rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. Processes to identify registry discrepancies appear to be adequate, but investigation and resolution of issues is not always completed in a timely manner.	
Actions taken to resolve the issue	Completion date	Remedial action status
UML trader records have been updated where Pulse is the trader Solar customers with RPS profile are updated to RPS PV1 profile code at the end of each month, prior to the initial submission of PV1 generation volume to the Reconciliation Manager. A data change request for initial energization date change is being compiled for submission to the Registry Engineer to update initial energization dates where Pulse was not the trader. Where Pulse is the trader, it has updated the initial energization date. MEPs are being chased more frequently for updates. One MEP nomination was rejected due to the MEP providing the incorrect MEP identifier to Pulse.	1 Nov 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Key business functions have been identified inside the business and dedicated resource is now allocated to tighten up the feedback loop within the operations department. This is monitored by monthly reporting of:</p> <ul style="list-style-type: none"> ANZSIC code gaps UML mismatches retail/network MEP presence on ICP Profile description codes <p>Performance of Field Service compliance will continue to be monitored on a monthly basis.</p>	1 Nov 2017	
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Title: Audit trails		
Non-compliance	Description	
<p>Audit Ref: 2.4 With: Clauses 18, 21, 22(1) and 22(2) Schedule 15.2</p> <p>From: entire audit period</p>	<p>HHR audit trails do not contain all the required information, and are not stored with the meter data.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate because they will mitigate the risk most of the time, but there is room for errors to occur.</p> <p>Original data is retained and archived. Audit trail data meeting the requirements is retained or can be derived, but is not available in the prescribed format or location. Pulse currently supplies 15 HHR ICPs, and missing data and corrections are relatively rare.</p>	
Actions taken to resolve the issue		Completion date
<p>Pulse is reviewing the documentation of HHR meter read file handling for the 13 ICPs that it submits as HHR to the Reconciliation Manager.</p>		1 Nov 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Remedial action status		
		Investigating

<p>Pulse will put in place a formal process to manage the version control of HHR meter read files used for compiling HHR profile submissions to the Reconciliation Manager.</p> <p>All changes to HHR submission files over the period January 2017 to August 2017 will be documented and stored in a spreadsheet or database.</p>	<p>1 Nov 2017</p>	
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Title: Providing registry information		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 11.7(2)</p> <p>From: entire audit period</p>	<p>365 late registry updates to active.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>Controls are rated as weak because they do not mitigate risk most of the time.</p> <p>There is a minor impact on invoicing for some ICPs and on other traders if ICPs switch out with the incorrect status; therefore the audit risk rating is low.</p> <p>Updates to active are processed, and flow through to the reconciliation systems so that they can be incorporated into revision submissions.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Gentrack 4 user acceptance testing was undertaken during the July August period of 2017. Subject matter experts allocated to field service, registry and metering related activities were committed to delivery of UAT during this period. Registry update timeliness during this period was adversely affected.</p> <p>UAT is completed, and Gentrack 4 is scheduled to go live before the end of the current certification period. As part of the UAT process, substantial resource has been committed to documentation of all operational processes and procedures.</p> <p>In addition to the Gentrack 4 upgrade, resource is allocated to update the training materials and skills of all staff that use Gentrack.</p>	<p>Gentrack 4 Go Live Date</p>	<p>Identified</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Consumption on de-energised ICP review will be performed by a dedicated compliance resource in the Field Services team several times a week using the Cobra NHH reconciliation system.</p> <p>The time delay between meter reading that identifies consumption on an inactive ICP, and updating registry status to active will be reduced by having the monitoring function within the field services team.</p> <p>Outstanding jobs will be followed up every two days.</p>	1 Nov 2017	

Title: Changes to registry information	
Non-compliance	Description
<p>Audit Ref: 3.3 With: Clause 10 Schedule 11.1</p> <p>From: entire audit period</p>	<p>121 late registry updates to inactive.</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
<p>Low</p>	<p>Controls are rated as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>There is a minor impact on invoicing for some ICPs and on other traders if ICPs switch out with the incorrect status; therefore the audit risk rating is low.</p> <p>There has been a reduction in late updates since the last audit.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>De-energised, meter disconnected will be chased up every two days in the absence of completed details.</p> <p>De-energised disconnected at pole fuse was due to a flooding event – greater care will be taken to confirm bulk event change details in future emergency situations.</p> <p>De-energised ready for decommissioning sites have on occasion been referenced as unable to gain access to confirm if the site had been demolished. Until we receive notification from the reader, we are unable to confirm that a site is demolished.</p> <p>The credit disconnection process is revised in line with the Gentrack 4 system upgrade. The existing process has a 10 day waiting period for credit disconnections and execution of status update in registry.</p> <p>Where an ICP is confirmed as de-energised, the registry ICP status will be updated to reflect de-energised vacant or de-energised remotely status. This will be in place as soon as the Gentrack 4 upgrade has been completed.</p>	Gentrack 4 Go Live Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Following Gentrack 4 upgrade, credit disconnection events resulting in de-energisation will updated to reflect inactive status in registry within one day of confirmation of de-energisation.</p> <p>Training on execution of de-energisation process will be refreshed for the field services team as part of the Gentrack 4 upgrade.</p> <p>Outstanding jobs will be followed up every two days.</p>	Gentrack 4 Go Live Date	

Title: Trader responsibility for an ICP	
Non-compliance	Description
<p>Audit Ref: 3.4 With: Clause 11.18</p> <p>From: entire audit period</p>	<p>The MEP was nominated later than five business days after becoming active for 44 ICPs.</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>Controls are rated as moderate because they mitigate risk most of the time but there is room for improvement</p> <p>There is a minor impact on MEPs because they can't update the registry until they are nominated. The audit risk rating is low.</p> <p>Arrangements were in place with MEPs, but the registry had not been updated. The ICPs remained with Pulse during the period.</p> <p>The process will be improved to nominate the MEP while the status is 1,12 which will increase compliance.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
New connections will be managed using status code 1-12 which allows the trader to nominate an MEP before the approved test house goes on-site.		25 Aug 2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training of staff for the use of appropriate ICP Status codes in registry.		1 Nov 2017	

Title: Provision of information to the registry	
Non-compliance	Description
<p>Audit Ref: 3.5</p> <p>With: Clause 9 Schedule 11.1</p> <p>From: entire audit period</p>	<p>44 late updates to active.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as weak because they only mitigate risk half of the time and they require improvement.</p> <p>There is a minor impact on billing and settlement because bills will be late and submission will be late. The audit risk rating is low.</p> <p>A relatively small number of new connections are processed, and on average these are updated on the registry within nine business days.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Gentrack 4 user acceptance testing was undertaken during the July August period of 2017. Subject matter experts allocated to field service, registry and metering related activities were committed to delivery of UAT during this period. Registry update timeliness during this period was adversely affected.</p> <p>UAT is completed, and Gentrack 4 is scheduled to go live before the end of the current certification period. As part of the UAT process, substantial resource has been committed to documentation of all operational processes and procedures.</p> <p>In addition to the Gentrack 4 upgrade, resource is allocated to update the training materials and skills of all staff that use Gentrack.</p>	Gentrack 4 Go Live Date	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>This is challenging due to the KPI for technical completion of the energisation to be completed being 30 days, with an additional timeframe for completion of documentation.</p> <p>Pulse will explore the option of following up with the ATH between 10-15 business days after request for metering.</p>	1 Nov 2017	

Title: Changes to unmetered load	
Non-compliance	Description
<p>Audit Ref: 3.7</p> <p>With: Clause 9(1)(f) of Schedule 11.1</p> <p>From: entire audit period</p>	<p>One ICP has incorrect unmetered load information recorded on the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as moderate because there is room for improvement.</p> <p>There is a minor impact on billing and settlement; therefore, the audit risk rating is low.</p> <p>Some other unmetered load discrepancies had been identified and corrected through the weekly registry discrepancy process, and six monthly unmetered load details review.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Pulse has reviewed registry contents for all ICPs with reference to UML for trader and distributor fields. Changes have been applied where ICP's are still with Pulse, and one network was consulted on the allocation of its UML coding.	30 Aug 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Pulse will undertake fortnightly unmetered load reviews. This will ensure unmetered load volumes are submitted accurately to the Reconciliation Manager. This will be performed by the dedicated compliance resource located within the Field Services team.</p> <p>Whenever network UML network registry data are unclear, Pulse contact the network to confirm the unmetered load description, and revise the registry UML data accordingly.</p>	1 Nov 2017	

Title: Management of "active" status	
Non-compliance	Description
<p>Audit Ref: 3.8 With: Clause 17 Schedule 11.1</p> <p>From: 24-Feb-17 To: 24-Feb-17</p>	<p>One new connection was recorded with an opening read date one day after the new connection date.</p> <p>Three new connections identified in the 2016 audit still have an incorrect active date recorded on the registry.</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as strong, as they are sufficient to prevent errors most of the time.</p> <p>All consumption was captured and reported for reconciliation purposes, and the active date was recorded correctly. All other ICPs checked were processed correctly, the incorrect opening read date appears to be a data entry error.</p> <p>All new connections during the audit period that were reviewed had the correct active date recorded on the registry.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
The three ICPs with incorrect active dates have been reviewed. Where Pulse is the current trader, we have updated the date in registry. Where Pulse is no longer the trader, a registry data fix request has been requested from the registry engineer.	1 Nov 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional training and validation will be put in place to ensure the active event date matches the MEP install and liven date.	1 Nov 2017	

Title: Management of “inactive” status		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 19 Schedule 11.1 From: entire audit period	Five ICPs with consumption while disconnected did not have their status updated to active. 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	Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. ICPs with consumption are being identified, but not investigated and updated in a timely manner. 127 ICPs with consumption while disconnected were identified, but half of the sample reviewed were found not to have genuine consumption after disconnection.	
Actions taken to resolve the issue	Completion date	Remedial action status
Consumption on de-energised sites is reported by a dedicated compliance resource in the Field Services department several times a week using the Cobra NHH reconciliation system. Sites that present legitimate consumption have status updated to active in registry.	25 Sep 2017	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Gentrack 4 user acceptance testing was undertaken during the July August period of 2017. Subject matter experts allocated to field service, registry and metering related activities were committed to delivery of UAT during this period. Registry update timeliness during this period was adversely affected.</p> <p>UAT is completed, and Gentrack 4 is scheduled to go live before the end of the current certification period. As part of the UAT process, substantial resource has been committed to documentation of all operational processes and procedures.</p> <p>In addition to the Gentrack 4 upgrade, resource is allocated to update the training materials and skills of all staff that use Gentrack.</p>	1 Nov 2017	

Title: Losing trader response to switch request and event dates - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.2</p> <p>With: Clauses 3 and 4 Schedule 11.3</p> <p>From: 10-Apr-17</p> <p>To: 07-Jun-17</p>	<p>Three incorrect AN response codes were applied.</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	
<p>Low</p>	<p>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>Three AN response codes were applied incorrectly. All should have had the "AD" (advanced metering) code applied, and information confirming the ICPs had AMI metering was available on the registry.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Human error resulted in these AN response files being sent with the incorrect status.</p> <p>Training has been provided to the switching team to improve accuracy of manually processed switch responses.</p>	25 Sep 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Training has been provided to improve accuracy of manually processed switch responses.</p> <p>The Gentrack 4 system will automatically handle responses to advanced metering switch requests, reducing the need for manual intervention.</p>	<p>Gentrack 4 Go Live Date</p>	
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Title: Losing trader must provide final information - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 5 Schedule 11.3</p> <p>For: 3 CS files</p>	<p>One late CS file.</p> <p>Two CS files contained readings for incorrect dates.</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>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>One CS file was one business day late. Both CS files containing reads for incorrect dates were later withdrawn.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Switching processes, documentation, and training are updated as part of the Gentrack 4 system upgrade.	Gentrack 4 go live date	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Registry breach reports are reviewed twice every business day to ensure timely delivery of CS files. This is a manual process that warrants revision in Registry – to exclude non business days from the report.	1 Sep 2017	

Title: Retailers must use same reading - standard switch		
Non-compliance	Description	
Audit Ref: 4.4 With: Clause 6(1) and 6A Schedule 11.3 For: entire audit period	Ten late RR files for transfer switches. Potential impact: Low Actual impact: None Audit history: Twice previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong because the process is sound and potentially incorrect readings are investigated as soon as possible. There is a minor impact on other traders and customers because rebilling must occur. The audit risk rating is low. Pulse generally sends RR files as soon as practicable after identifying that a change is required.	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse will investigate more options for gaining meter readings for use in RR files.	1 Nov 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training of Switching staff is undertaken as part of the Gentrack 4 system upgrade.	Gentrack Go Live Date	

Title: Non-half hour switch event meter reading - standard switch		
Non-compliance	Description	
Audit Ref: 4.5 With: Clause 6(2) and (3) Schedule 11.3 From: 23-May-17 To: 23-May-17	One RR request was rejected, when it should have been accepted. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong because the process is sound and potentially incorrect readings are investigated as soon as possible. There is a minor impact on other traders and customers because rebilling must occur. The audit risk rating is low. The switch was later withdrawn. All other RR requests were accepted.	

Actions taken to resolve the issue	Completion date	Remedial action status
This was an operator error, there are controls around this process to verify that actual reads and smart meter readings have precedence over estimates.	25 Sep 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training to users – updated as part of the Gentrack 4 implementation. This should improve the accuracy of RR request responses.	25 Sep 2017	

Title: Losing trader provides information - switch move		
Non-compliance	Description	
Audit Ref: 4.8 With: Clause 10(1) Schedule 11.3 From: 22-May-17 To: 28-Jun-17	Two incorrect AN response codes were applied. 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 they are sufficient to mitigate risk most of the time, but there is room for improvement. Two AN response codes were applied incorrectly. Both should have had the “AD” (advanced metering) code applied and information on the metering was available on the registry.	
Actions taken to resolve the issue	Completion date	Remedial action status
Switching training has been revised to include the August 2016 Memo “Losing trader obligations when providing switch response codes in AN file”.	25 Aug 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A training refresh will be undertaken in conjunction with the Gentrack 4 upgrade training. This should reduce operator errors in scenarios where direct access to registry is required for switch responses.	Gentrack 4 Go Live Date	

Title: Losing trader determines a different date - switch move		
Non-compliance	Description	
Audit Ref: 4.9 With: 10(2) Schedule 11.3 (2) From: 2 switch files	Incorrect dates were recorded in two AN files. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as they mitigate the risk most of the time. The requirements of the clause are understood, only two files were affected and one was later withdrawn.	
Actions taken to resolve the issue	Completion date	Remedial action status
When the AN file is transmitted at 10 business days in the future, it appears in the breach report. For these files, the CS file is sent out on the correct date, with manual intervention to adjust the transfer date. Switching team has had refresher training on the importance of monitoring the switch dates in the breach report.	25 Aug 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A switching training refresh will be undertaken in conjunction with the Gentrack 4 upgrade training. This should reduce operator errors in scenarios where direct access to registry is required for switch responses.	Gentrack 4 Go Live Date	

Title: Losing trader must provide final information - switch move	
Non-compliance	Description
Audit Ref: 4.10 With: Clause 11 Schedule 11.3 From: entire audit period	10 late CS files for move in switches. 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 rated as strong because they mitigate risk most of the time. Late CS files have a minor impact on other traders. The audit risk rating is low.</p> <p>Some late CS files were identified on the switch breach report; some were found not to be genuine.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Switching processes, documentation, and training are updated as part of the Gentrack 4 system upgrade.		Gentrack 4 go live date	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Registry breach reports are reviewed twice every business day to ensure timely delivery of CS files. This is a manual process that warrants revision in Registry – to exclude non business days from the report.		1 Sep 2017	

Title: Gaining trader changes to switch meter reading - switch move	
Non-compliance	Description
<p>Audit Ref: 4.11</p> <p>With: Clause 12 Schedule 11.3</p> <p>For: entire audit period</p>	<p>13 late RR files for switch moves.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>Pulse generally sends RR files as soon as practicable after identifying that a change is required.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Actual readings were received after the initial CS file was issued to the gaining trader beyond the maximum four month timeframe. All of these have supporting email correspondence and have been agreed upon with the other traders. Pulse negotiates with other traders on the application of start read disputes.	25 Sep 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As the uptake of remotely read meters increases, exposure to unread meters is reduced over time.	Ongoing	

Title: Withdrawal of switch requests		
Non-compliance	Description	
Audit Ref: 4.15 With: Clauses 17 and 18 Schedule 11.3 From: entire audit period	11 backdated NW requests. One incorrect NW code. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as they are sufficient to mitigate risk most of the time. A small proportion of NWs (1%) were late. Only one of the 11 NWs reviewed had an incorrect response code.	
Actions taken to resolve the issue	Completion date	Remedial action status
Switching staff have resources available to determine the corrective response code for NWs. Where a human error has occurred then corrective actions are to take place with the support of another team member or management. This can also be determined by the response from the other participant upon rejection and new correction put in place.	25 Aug 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Training will be refreshed along with the implementation of Gentrack 4 training.	GT4 Go Live Date	
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Title: Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 10.13 and clause 15.2 From: entire audit period	Energy is not metered and quantified according to the code where meters are bridged. 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 they are sufficient to mitigate risk most of the time, but there is room for improvement. Bridging only occurs where a soft reconnection cannot be performed after hours and the customer urgently requires their energy supply for health and safety reasons.	
Actions taken to resolve the issue	Completion date	Remedial action status
Bridged meters will continue to be investigated, with known bridged meters being re-configured with estimated volume allocated.	1 Nov 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training will be given to the field service team. Where a meter is identified as being bridged, an assessment is made to estimate the volume consumed during the bridged period. The meter register is removed as at the estimated read, and the register is reinstated using the actual reading on the register. This ensures that unmetered volume during a bridge event is passed through to the reconciliation manager via the Cobra NHH reconciliation system.	1 Nov 2017	

Title: Interrogate meters once		
Non-compliance	Description	
Audit Ref: 6.8 With: Clause 7(1) and (2) Schedule 15.2 From: entire audit period	Some ICPs were not read during the period of supply. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak as they are unlikely to mitigate the risk. The number of ICPs unread during the period of supply could not be quantified as reporting was not available.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will investigate additional options for gaining access to the meters to improve meter access under three months of no meter access.	BAU	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Current response to meter access issue is to send a letter, then follow up with a telephone call to the customer after three months of no access to meter. We will investigate additional options for gaining access to the meters to improve meter access under three months of no meter access.	1 Dec 2017	

Title: NHH meters interrogated annually	
Non-compliance	Description
Audit Ref: 6.9 With: Clause 8(1) and (2) Schedule 15.2 From: entire audit period	For three ICPs without an actual read for 12 months, exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met. 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>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>Three cases were identified where exceptional circumstances could not be confirmed, and there was insufficient evidence that the best endeavours requirement was met.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We will investigate additional options for gaining access to the meters to improve meter access under three months of no meter access.		1 Nov 2017	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Current response to meter access issue is to send a letter, then follow up with a telephone call to the customer after three months of no access to meter.</p> <p>We will investigate additional options for gaining access to the meters to improve meter access under three months of no meter access.</p>		1 Nov 2017	

Title: Correction of NHH meter readings	
Non-compliance	Description
<p>Audit Ref: 8.1</p> <p>With: Clause 19(1) Schedule 15.2, 15.12</p> <p>From: entire audit period</p>	<p>A correction was processed incorrectly for one defective meter.</p> <p>Corrections were not processed for nine bridged meters, five ICPs with consumption while disconnected, and one ICP with incorrect unmetered load recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as weak as they are unlikely to mitigate the risk of incorrect data.</p> <p>Processes are in place to identify corrections required, but they are not consistently followed through to completion. A relatively small number of corrections required were identified.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Bridged meters will continue to be investigated, with known bridged meters being re-configured with estimated volume allocated.	1 Nov 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Refresher training will be given to the field service team. Where a meter is identified as being bridged, an assessment is made to estimate the volume consumed during the bridged period. The meter register is removed as at the estimated read, and the register is reinstated using the actual reading on the register.</p> <p>This ensures that unmetered volume during a bridge event is passed through to the reconciliation manager via the Cobra NHH reconciliation system.</p>	1 Nov 2017	

Title: Electronic meter readings and estimated readings		
Non-compliance	Description	
<p>Audit Ref: 9.6 With: Clause 17 Schedule 15.2</p> <p>From: entire audit period</p>	<p>AMI event information not adequately obtained and monitored. No AMI event information is received from Arc.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak as they are insufficient to mitigate risk of non-compliance.</p> <p>Pulse is monitoring and actioning emailed event information.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse currently receives AMI event data from all AMI MEPs with the exemption of Arc Innovations. We have initiated discussion with our supplier.	27 Sep 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to investigate options to extract meter event data with our supplier.	1 Dec 2017	

Title: Calculation of ICP days		
Non-compliance	Description	
<p>Audit Ref: 11.2 With: Clause 15.6</p> <p>From: entire audit period</p>	<p>Inactive HHR ICP days, and HHR ICPs with installation type "G" (generation) are incorrectly included in the AV110 ICP days report.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>Pulse currently supplies 15 generating ICPs. Of those, one has installation type "G", and one is inactive.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
A systemic issue exists in the Cobra reconciliation system whereby ICP Days have been calculated and reported for an ICP with "G" load type. Pulse has only one ICP with this configuration, and will manually remove it from ICP Days calculations.	19/9/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The cost of implementing change in the Cobra NHH Reconciliation system to ignore "G" type ICPs in the ICP Days report makes a software update uneconomic. A process stage to manually remove the affected ICP days from "G" type ICPs has been implemented as part of business as usual.	19/9/2017	

Title: HHR aggregates information provision to the reconciliation manager		
Non-compliance	Description	
Audit Ref: 11.4 With: Clause 15.8 From: entire audit period	HHR aggregates file does not contain electricity supplied information. Potential impact: None Actual impact: None Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	This is an error in the code, Pulse is providing submission information as expected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse considers this breach risk as a Code issue, and supports an update of Clause 15.8 of the Code as described above.	N/A	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse prepares its HHR aggregate volume file using HHR meter data available at the time of submission. Because all but one of Pulse supplied HHR ICPs are generators, the electricity “supplied” volume is an insignificant portion of this report when compared with “electricity received”.	N/A	

Title: Creation of submission information	
Non-compliance	Description
Audit Ref: 12.2 With: Clause 15.2, 15.4 and 15.12 of part 15 From: entire audit period	Some incorrect submission information had not been corrected. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement.</p> <p>Some issues identified during the previous audit have been resolved, and the issues that remain have a low impact on submissions. Cobra has prevented recurrence of some data accuracy issues identified in the 2016 audit.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Bridged meters will continue to be investigated, with known bridged meters being re-configured with estimated volume allocated.</p> <p>De-energised sites with consumption will be set as active as at the date of first consumption following the date of de-energisation.</p>		1 Nov 2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Bridged meters and de-energised sites with consumption will be investigated and identified for correction by compliance resource within the field services team.</p> <p>Identification of bridged meters and de-energised meter with consumption will be added to the monthly compliance dashboard.</p>		1 month after GT4 Go Live	

Title: Allocation of submission information	
Non-compliance	Description
<p>Audit Ref: 12.3 With: Clause 15.5</p> <p>From: 01-Feb-16 To: 29-Feb-16</p>	<p>Zero lines were manually deleted from the AV080 February 2016 14 month revision.</p> <p>Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>Cobra automatically enters zero lines where required. Previous revisions had zero lines recorded correctly, so there is no impact on reconciliation.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
This occurred using a legacy NHH submission system that has since been replaced.	1 Nov 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The new Cobra NHH Reconciliation system maintains zero lines where required.	April 2017	

Title: Permanence of meter readings for reconciliation		
Non-compliance	Description	
Audit Ref: 12.8 With: Clause 4 of Schedule 15.2 From: Dec 2015 to Feb 2016	Some estimates not replaced at R14. 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 rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. Total forward estimate across the three months reviewed was 383,881 kWh.	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse is in the process of populating the historic estimate data within the Cobra NHH reconciliation system. Cobra currently submits 100-200MWh of additional forward estimate volume to the market in each revision due to legacy data quality issues in Gentrack 3.8. We expect that this will be resolved upon migration to Gentrack 4.0 as part of a data cleansing exercise.	Gentrack 4 Go Live Date	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
The migration to Gentrack 4 is expected to improve the level of validation and quality of data available for reconciliation purposes.	Gentrack 4 Go Live Date	

Title: Forward estimate process		
Non-compliance	Description	
<p>Audit Ref: 12.12</p> <p>With: Clause 6 of Schedule 15.3</p> <p>From: Jan 2016, Mar 2016, May 2016 and Oct 2016</p>	<p>The accuracy threshold was not met for all months and revisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Six times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as they are sufficient to mitigate risk most of the time.</p> <p>Initial data is replaced with revised data, and washed up. A small number of submissions had differences over the threshold.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We consider the breach risk rating of accuracy threshold to be negligible given;</p> <ul style="list-style-type: none"> a) the impact of aggressive customer growth (where initial submissions are not available until a second read is present) and b) the externality of shape change transitions affecting some NSP submission revisions. 	27 Sep 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Pulse has a pre-defined process for the production of NHH submissions to the Reconciliation Manager.</p> <p>Where high levels of ICP growth are experienced, the default volume applied to the initial estimate can be a substantial proportion of the total volume supplied. When these customers are first invoiced, the actual readings received can present a noticeable variance from the default volume, resulting in exposure to breach in the DUNEDINDUNEG and CLYDE00DUNEG balancing areas.</p> <p>Additionally, where irrigation demand changes substantially at either end of a trading month, the residual shape profile allocation of volume to that month can alter the proportion of energy allocated in subsequent submissions. This is experience in the ASHBURTEASHG balancing area.</p>	27 Sep 2017	

Title: Market Administrator Meter Reading Reports		
Non-compliance	Description	
Audit Ref: 13.1 With: Clauses 8 & 9 of Schedule 15.2 From: April 2017 and July 2017	One meter reading frequency report was submitted late. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as they are sufficient to mitigate risk most of the time. One report was two business days late. The other reports checked were submitted on time. The late submissions had no impact on other participants.	
Actions taken to resolve the issue	Completion date	Remedial action status
Meter read frequency report was delivered several days late.	26/9/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will maintain production of the meter read frequency report to be delivered before the end of the 20th business day of each month.	26/9/2017	

Title: Historical estimate reporting to RM		
Non-compliance	Description	
Audit Ref: 13.4 With: Clause 10 of Schedule 15.3 From: entire audit period	Historic estimate thresholds 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 rated as moderate as they are sufficient to mitigate risk most of the time, but there is room for improvement. Pulse was close to the target in all cases.	

Actions taken to resolve the issue	Completion date	Remedial action status
Pulse is investigating its permanent estimate process as part of the Cobra NHH reconciliation system implementation. This will be undertaken prior to 14 months of operation of Cobra. Pulse will investigate options to bring this into production before the end of 2017.	31 Dec 2017	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will investigate options to bring this into production before the end of 2017.	31 Dec 2017	