

Compliance plan for Pulse Energy 2021

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2; 15.2 From: 01-Oct-20 To: 30-Jun-21	PUNZ/PPPP A small quantity of information in the registry was inaccurate, Incorrect information in CS files 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 assessed as moderate. They will mitigate risk most of the time but there is room for improvement. Recently introduced reports help to identify inaccuracies and correct them. Audit risk rating is assigned as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has put in place a system fix regarding to CS files.		31/6/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We have not seen any incorrection information in CS files since.		01/05/2021	

Non-compliance	Description		
<p>Audit Ref: 2.11</p> <p>With: 10.33A</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ – 14 reconnections had expired certification recorded on the registry when they were reconnected;</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate. Pulse Energy proactively works with MEPs to ensure meters are certified when an ICP is reconnected. Audit risk rating is recorded as low due to the small number of ICPs affected		
Actions taken to resolve the issue		Completion date	Remedial action status
Field Services (FS) are working with Customer Services (CS) to monitor this. The meters do not get re-certified in time so we hold the MEPs accountable for not certifying in a timely manner. We are working on a report internally to pick these ones up as they get reconnected.		1/11/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New reporting and procedures have been put in place to cover this issue. Pulse will strengthen training to make sure agents check certification date before issuing a reconnection job.		1/11/21	

Non-compliance	Description		
<p>Audit Ref: 3.3</p> <p>With: 10 of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - Late updates of “inactive” and “active” status and trader information.</p> <p>PPPP – relatively low numbers of late registry updates for active, inactive, disconnection and MEP switches.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate. There are good processes in place, they need to be rigorously followed. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Controls have been introduced and are working to contain the problem. Pulse has seen substantial improvements on this since we put in place control reports. Pulse relies on 3 rd parties to provide timely information to further improve this.		01/04/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Training and processes will be further tweaked to ensure that updates are notified within timeframes whenever it is humanly possible to do so. However, it is important to recognize that there will always be some number of late updates arising from causes beyond our control. It has always been our policy to prioritize accuracy over timeliness, whenever the two conflict, and we will continue to submit late updates when it is necessary to ensure accurate reconciliation.		01/10/2021	

Non-compliance	Description		
<p>Audit Ref: 3.5</p> <p>With: 9 of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ – late trader updates, late updates of ANZSIC code for 5 ICPs, few corrections of “active” date</p> <p>PPPP – A very small number of MEP switch’s in the registry were later than 5 business days.</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 because they mitigate risk most of the time but there is room for improvement. The audit risk rating is assessed as low because there is a process in place to identify and correct incorrect entries and volumes will be washed up through the revision process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A control report was brought in June 2021, this is being monitored and rectified on a weekly basis.		1/6/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Weekly reports and monitoring have been put in place since June 2021. We believe moving to weekly clearing of reported errors should prevent late updates from happening again.		1/6/21	

Non-compliance	Description		
<p>Audit Ref: 3.6</p> <p>With: 9(1)(k) of Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ –4 ICPs with incorrect ANZSIC code</p> <p>Some ICPs had incorrect ANZSIC code recorded in the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating:2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is recorded to be low. No impact on market settlement.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The option to use the ANZSIC code T99 has been removed from Gentrack but some have gotten through. We have set up a weekly report going forward to monitor this so these will be picked up going forward.</p> <p>We will improve our reports to identify suspect ANZSIC errors and will introduce further programs to check these codes when customers contact us for other reasons.</p>		1/11/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse is developing a process to work with customers and networks to pinpoint what the actual end use of the property is.		1/11/21	

Non-compliance	Description		
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PPPP – 3 ICPs had the incorrect AMI flag set in the Registry for an AMI disconnecting meter.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating:1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as strong. A very low number of discrepancies, 3 ICPs were corrected, and the remaining were explained by meter replacement process. The audit risk rating is recorded to be low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Issue for these 3 sites seems to be caused by a delay in the MEP in updating the AMI flag back to Y when meter has gone from non-communicating back to communicating.</p>		1/10/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Pulse is going to discontinue services with PPPP from the 1/10/21.</p>		1/10/21	

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: 5 of Schedule 11.3</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - Average daily consumption methodology is incorrect</p> <p>Average daily consumption value was incorrect for 1 ICP</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong. Good management of switching process. Audit risk rating is recorded as low due to the small number of ICPs affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Gentrack resolved the issue in June 2021		31/6/21	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Gentrack resolved the issue in June 2021		31/6/21	

Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With:6(1) and 6A of Schedule 11.3</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - 1 late RR files for Standard Switch</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating:1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong. The tool used by Pulse Energy to evaluate CS reads from losing traders is highly effective. Audit risk rating is recorded as low		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse is implementing a new process to bring the RR records to COBRA. The reconciliation team has had several meetings with Pulse's internal development team, we expect to put in place an automated system fix by 1/11/21		1/11/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A monthly manual process has been setup to verify final reads in COBRA comparing with Gentrack.		1/11/21	

Non-compliance	Description		
<p>Audit Ref: 4.7</p> <p>With: 9 of Schedule 11.3</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - Incorrect type of switch used</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</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. It is a common practise used between some traders. Audit risk rating is recorded as low. The impact on settlement outcomes is minor, ICPs switch on the same read</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse is aware of this non-compliance issue. There is a lack in mechanism to realistically backdate TR switches. It is common practice to use NTMI for backdated switches to ensure that the site switches on the requested date. This was discussed in the EA's recent switch process review, where the consensus was that a new switch type should be created for use in these instances.</p>		1/10/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.		1/10/20	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 11 of Schedule 11.3</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - Average daily consumption methodology is incorrect</p> <p>Average daily consumption value was incorrect for 5 ICPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong. Good management of switching process. Audit risk rating is recorded as low due to the small number of ICPs affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Gentrack resolved the issue in June 2021		1/7/21	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Gentrack resolved the issue in June 2021		1/7/21	

Non-compliance	Description		
<p>Audit Ref: 4.11</p> <p>With:12 of Schedule 11.3</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - 6 late RR files for Switch Move</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating:1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as strong. Good management of switching process. Audit risk rating is recorded as low due to the small number of ICPs affected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse is aware of this non-compliance issue. There is a lack in mechanism to realistically backdate TR switches. It is common practice to use NTMI for backdated switches to ensure that the site switches on the requested date. This was discussed in the EA's recent switch process review, where the consensus was that a new switch type should be created for use in these instances.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.			

Non-compliance	Description		
<p>Audit Ref: 6.9</p> <p>With: 8(1) of Schedule 15.2</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - 100% attainment was not achieved for up to 9 NSPs in 12 months period</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Many times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as strong. There are very good processes in place. Overall percentage of compliance is 99.99%. Some ICPs are very difficult to read, access problems. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse has established a robust process to ensure all the meters are read according to compliance requirements. All the meters that Pulse is unable to read are with exceptional circumstances. Pulse tried at least 4 different methods(calling, texting, emails and sending field visits) to obtain meter reads on ICPs without read for 12 months.</p>		1/10/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Pulse will further improve the processes to record reasons for no read.</p>		1/10/20	

Non-compliance	Description		
<p>Audit Ref: 6.10</p> <p>With: 9(1) of Schedule 15.2</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - 90% attainment was not achieved for more than two NSPs over 4 months</p> <p>PPPP - 90% attainment was not achieved for more than one NSP over 4 months</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Many times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as strong. There are good processes in place. Overall percentage of compliance is 99%. Some ICPs are very difficult to read, access problems. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse has established a robust process to ensure all the meters are read according to compliance requirements. All the meters that Pulse is unable to read are with exceptional circumstances. Pulse tried at least 4 different methods(calling, texting, emails and sending field visits) to obtain meter reads on ICPs without read for 12 months.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Pulse will further improve the processes to record reasons for no read.</p>			

Non-compliance	Description		
<p>Audit Ref: 6.13</p> <p>With: 11(2)(e) of Schedule 15.2</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - No interrogation log is generated by the interrogation software to record details of all interrogations for readings provided by AccuCal</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as strong. There are only two meters read by AccuCal. AccuCal is certified as an ATH and MEP. Reading meters and providing data to traders are additional services provided by AccuCal. No impact on settlement outcomes. Audit risk low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse receives the interrogation log files from AccuCal. However, Pulse does not current have a process to review and action on the interrogation log files. Pulse is in talk with AccuCal to see if AccuCal can be compliant with 11(2)(e). Pulse may consider transferring the meter data provision function to other fully compliant MEP.</p>		18/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See above.		18/12/2020	

Non-compliance	Description		
<p>Audit Ref: 9.3</p> <p>With: 3(5) of Schedule 15.2</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ - Meter data provided in the EIEP3 format rounded therefore it results in a technical breach for Pulse Energy</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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 recorded as moderate. It is a technical breach. Pulse Energy has to request their service provides to provide raw meter data. The impact on settlement outcomes is medium therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse will engage with AMCI, FCLM, and EDM I to find a solution. Intellihub no longer rounded data.		1/11/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above.		1/11/21	

Non-compliance	Description		
<p>Audit Ref: 9.6</p> <p>With: 17(4)(f) of Schedule 15.2</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ -Meter event information for AMI meters is not reviewed because log files are not provided by MEPs and agents except AccuCal</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate because of the lack of review of log files from MEPs that are provided to them could affect the integrity of data. Pulse Energy have very stringent data validation processes which can offset the possible inaccuracy of data. The majority of sites traded by Pulse Energy are NHH.</p> <p>The risk rating is low because most issues should be identified through Pulse Energy's other read validation processes, and some events are emailed by the MEPs for urgent action.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Pulse has a robust HHR metering reading validation process in place to mitigate some of the risks. Pulse will work with MEPs for log files.		1/11/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Same as above.		1/11/21	

Non-compliance	Description		
<p>Audit Ref: 12.7 With: 15.12</p> <p>From: 01-Oct-20 To: 30-Jun-21</p>	<p>PUNZ – Incorrect submission information for situations which are outside of main processes e.g. disconnected consumption, status reversal in the registry.</p> <p>One breach was recorded for inaccurate submissions.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Medium</p>	<p>Controls are rated as weak as they are unlikely to mitigate the risk of incorrect data. The issue has been noted previously and it still not satisfactory resolved. Audit risk rating is recorded as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>1. We are currently working with our development team to use RR and CS records in Cobra.</p> <p>2. We are currently working with our development team to use RR and CS records in Cobra.</p> <p>3. We will use the NearMatch report going forward.</p> <p>4. HHR ICP- The walkthrough of the HHR correction and estimation processes confirmed compliance, and that corrections will flow through to the relevant submission files.</p> <p>5. Field Services (FS) run a report to monitor consumption while inactive. FS will share the report with reconciliation so we can monitor and rectify the volume submitted in Cobra.</p> <p>6. Field Services (FS) run a report to monitor bridged meter readings. FS will share the report with reconciliation so we can monitor and rectify the readings in Cobra. We are also working with our development team to investigate why these readings do not get pulled through automatically.</p> <p>7. Field Services (FS) run a report to monitor defective meters. FS will share the report with reconciliation so we can monitor and rectify the readings in Cobra. We are also working with our DBA to investigate why these readings do not get pulled through automatically.</p> <p>8. Multipliers are processed correctly by cobra.</p> <p>9. UML - no issues found</p> <p>10. We under-submitted HHR ICP days. Measures were put in place to prevent this happening again. This issue has not occurred since we put the measures in place.</p>	1/12/21	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	1/12/21	

Non-compliance	Description		
<p>Audit Ref: 12.8</p> <p>With: 4 of Schedule 15.2</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PUNZ- Some forward estimates are not replaced by permanent estimates in R14</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are recorded as moderate. There are good processes in place implemented by the Field Services and the Switching Team. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low. Audit risk rating low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are continually monitoring and looking at ways to improve and reduce the number of affected sites.		1/11/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Pulse will continue to review R14 accuracy to identify process problems in order to improve our existing processes.		1/6/2022	

Non-compliance	Description		
<p>Audit Ref: 13.3</p> <p>With: 10 of Schedule 15.3</p> <p>From: 01-Oct-20</p> <p>To: 30-Jun-21</p>	<p>PPPP - Historical estimates target not met for revision 3 and 7 for 4 months</p> <p>PUNZ - Historical estimates target not met for revision 3, 7, and 14 for small number of NSPs</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple time</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, non-compliance with R3 is and 7 is small (volumes are ever decreasing). More detective controls need to be designed to address R14. The impact on settlement outcomes is minor therefore the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have identified the common scenarios that lead to data being incorrectly recorded at the R14 submission stage (mostly, switch reads, and meter change information not being correctly captured by Cobra) and have already implemented new processes to catch and correct these cases.</p>		1/12/21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Pulse will continue to review R14 accuracy to identify process problems to improve our existing processes.</p>		1/12/21	