

Compliance plan for Pulse Energy Alliance Reconciliation Participant Audit 2022

Relevant information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.6, 11.2, 15.2</p> <p>From: 01-Sep-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Some registry and submission information incorrect and not updated as soon as practicable.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate overall but there is room for improvement, specifically in relation to the management of inactive vacant consumption and correction of submission information for defective and bridged meters.</p> <p>The audit risk rating is assessed to be medium based on the kWh of under submission detailed above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Incorrect submission Flag: This has been resolved in May and fortnightly report has been set up to monitor and prevent this going forward.</p> <p>Incorrect profiles: This has been resolved in May and fortnightly report has been set up to monitor and prevent this going forward.</p> <p>Meters with zero consumption are currently being monitored and actioned.</p> <p>Vacant Consumption: A list of sites with vacant consumption have already been passed to Revenue Assurance team to record consumption in Gentrack which will then feed to Cobra.</p> <p>Bridged Meters: Field service team had calculated the missing volume for all bridged meters and pass to Revenue Assurance team for customer related actions</p>	26 th May 2022	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Pulse is working on resuming the No Read process from 1st July. The process was stop during covid lock down in November 2021.</p> <p>We have put in place a process to monitor bridged meters after the audit.</p> <p>Meters with zero consumption are currently being monitored and actioned on.</p>	1 st July 2022	

Electrical Connection of Point of Connection		
Non-compliance	Description	
<p>Audit Ref: 2.11</p> <p>With: Clause 10.33A</p> <p>From: 09-Sep-21</p> <p>To: 01-Mar-22</p>	<p>PUNZ</p> <p>Six new connections were not certified within five business days of initial electrical connection.</p> <p>39 reconnections were not certified within five business days of electrical connection.</p> <p>ICP 0030386502PC8CC was not recertified when un-bridging occurred. Certification is now cancelled.</p> <p>PPPP</p> <p>Four reconnections were not certified within five business days of electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
PPPP - reconnection was self-service by customer, Pulse has stop PPPP services since 30/09/2021	26/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Refresher training will be provided to Customer Care to follow correct processes when requesting reconnections.</p> <p>Field Services will also closely monitor the registry compliance reporting from 1st July.</p>	1/07/2022	

Meter bridging		
Non-compliance	Description	
<p>Audit Ref: 2.17</p> <p>With: Clause 2A of Schedule 15.2</p> <p>From: 24-Sep-21</p> <p>To:22-Feb-22</p>	<p>PUNZ</p> <p>Consumption for three of four bridged meters has not been submitted.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak as the process does not have sufficient controls to ensure that corrections are applied.</p> <p>The impact on settlement is expected to be minor as the volume of bridged meters is expected to be small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Field Services team has started reviewing bridged meters and either calculate consumption or refer to RA to calculate and engage with the customer.	24/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Field services process has been put in place to monitor and action on bridged meters.	24/05/2022	

Changes to registry information		
Non-compliance	Description	
<p>Audit Ref: 3.3</p> <p>With: Clause 10 Schedule 11.1</p> <p>From: 09-Sep-21</p> <p>To: 01-Mar-22</p>	<p>PUNZ</p> <p>47 late updates to active status.</p> <p>29 late updates to inactive status.</p> <p>499 late trader updates.</p> <p>Five ANZSIC code updates more than 20 business days after initial electrical connection or switch in.</p> <p>PPPP</p> <p>Five late updates to active status.</p> <p>Two late updates to inactive status.</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, but there is still room for improvement. 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
<p>All late updates identified.</p> <p>System issues are caused by incorrect process flows on Gentrack which are causing some of the delays. Pulse has now fixed the process flow issues.</p>	24/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>FS has controls in place to monitor and ensure follow ups are being completed for connection status updates.</p> <p>Reversal feature is not available in Gentrack. Field Service team will have to continue to make corrections/adjustments where required.</p> <p>PPPP services ceased from 30/09/2021</p>	24/05/2022	

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: 24-Sep-21</p> <p>To:22-Feb-22</p>	<p>PUNZ</p> <p>19 late updates to active status for new connections.</p> <p>17 late MEP nominations for new connections.</p> <p>One incorrect active event date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Late updates identified	26/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Late updates were caused by billing system issues. Pulse is undergoing billing system upgrade at the moment. The upgrade includes fixes to the system issues.	22/10/2022	

ANZSIC codes		
Non-compliance	Description	
<p>Audit Ref: 3.6</p> <p>With: 9 (1(k) Schedule 11.1</p> <p>From: 24-Sep-21</p> <p>To:22-Feb-22</p>	<p>PUNZ</p> <p>Seven ICPs with incorrect ANZSIC codes.</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.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have updated the ANZSIC code for the seven ICPs	1/7/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Our investigation found that attempts were made to contact customers to confirm the best ANZSIC code to use. For the ones where customer replied, changes were made accordingly. For the ones where we have no reply, PUNZ is currently leaving the ANZSIC code as it is (except blank or T994). Pulse will implement a process change to load the ANZSIC code most close to information Pulse has rather than leave it as what the previous retail had.</p> <p>Recon will set up additional reports to monitor and prevent this.</p>	1/6/22	

Management of "active" status			
Non-compliance	Description		
Audit Ref: 3.8 With: Clause 17 Schedule 11.1 From: 09-Sep-21 To: 01-Mar-22	PUNZ Three ICPs with incorrect active dates. 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 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
We have updated our processes to use electrical connection date to be the active date.		26/05/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Paperwork will be monitored more closely and frequently		26/05/2022	

Management of "inactive" status		
Non-compliance	Description	
<p>Audit Ref: 3.9</p> <p>With: Clause 19 Schedule 11.1</p> <p>From: 24-Sep-21</p> <p>To:22-Feb-22</p>	<p>PUNZ</p> <p>Incorrect status for ICP 0158502167LC63E.</p> <p>Incorrect status reason for ICP 0000566989NR80B which switched in at 1,7.</p> <p>Incorrect status reason for ICP 0000222731TE242 at 1,5 but was 1,9.</p> <p>Incorrect status for 14 ICPs with consumption while inactive resulting in under submission of 17,466 kWh.</p> <p>Incorrect status for three vacant ICPs (0280470029LC488, 0273892118LC0EF and 0000727240TE4AC) with consumption recorded after the disconnection date.</p> <p>Potential impact: Low</p> <p>Actual impact: Medium</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are assessed to be moderate, because most ICPs have the correct status and event dates recorded, but there is room for improvement.</p> <p>The impact was assessed to be low. There is a small impact on settlement for the ICP incorrectly recorded as inactive, and a very minor impact on ICP days submissions.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Statuses are corrected for all the ICPs identified.	26/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Status reason issues were caused by training. A refreshment training will be provided to the team.</p> <p>Field Service team will start monitor and action on consumption from vacant ICP.</p>	26/05/2022	

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: 01-Sep-21</p> <p>To: 08-Mar-22</p>	<p>PUNZ</p> <p>Five of 197 AN files incorrectly had a response code of AA.</p> <p>Two of 2,178 AN files incorrectly had a response code of AD.</p> <p>PPPP</p> <p>One E2 breach.</p> <p>Two AN files incorrectly had a response code of AD.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>There is no impact on settlement or other participants because the AD field is normally derived from the registry by gaining traders, not from the AN file. The E2 breach did not affect either the participant or the customer. Therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Pulse put in place a fix before which worked. This issue reappeared.</p> <p>PPPP - human error as switching processed manually via REG</p>		1/07/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Pulse will raise this issue again with Gentrack for a fix.</p> <p>PPPP ceased from 30/09/2021.</p>		1/07/2022	

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: 24-Sep-21</p> <p>To: 22-Feb-22</p>	<p>PUNZ</p> <p>Average daily consumption of zero incorrect for two of five examples.</p> <p>Average daily consumption of more than 200 kWh incorrect for one of five examples.</p> <p>Date of last meter reading incorrect for two ICPs.</p> <p>PPPP</p> <p>One E2 breach.</p> <p>One CS breach.</p> <p>Two ICPs with switch event readings labelled as estimates and they should have been labelled as actual.</p> <p>Three ICPs with incorrect last read dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Pulse will raise with Gentrack on the two zero Average Daily Consumption cases.</p> <p>PPPP - human error</p>	1/07/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Pulse will raise with Gentrack on the two zero Average Daily Consumption cases.</p> <p>PPPP ceased from 30/09/2021.</p>	1/07/2022	

Retailers must use same reading - standard switch		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: 6(1) and 6A Schedule 11.3</p> <p>From: 03-Feb-22</p> <p>To: 09-Mar-22</p>	<p>PUNZ</p> <p>The RR file for ICP 2611016500CHA7C contained the losing trader's customer's read and it was not supported by two actual reads.</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
PUNZ used a non-validated reading to resolve a customer dispute – provided both retailers involved are happy with the amendment and the consumption is being accounted for. This is not our normal/preferred practice.	24/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training will be provided to front line customer service agents to prevent loading unreasonable customer read	01/07/2022	

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: 01-Sep-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>One ICP incorrectly had a response code of AA.</p> <p>Five AN files incorrectly had a response code of AD.</p> <p>PPPP</p> <p>One ET breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse put in place a fix before which worked. This issue reappeared.	1/07/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will raise the issue with Gentrack for a fix	1/07/2022	

Losing trader must provide final information - switch move		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 11 Schedule 11.3</p> <p>From: 01-Sep-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Average daily consumption incorrect for four ICPs.</p> <p>Last read date incorrect for five of eight files checked.</p> <p>Incorrect last read date for one ICP not read during the period of supply.</p> <p>Three CS files had readings labelled as estimates and should have been actuals.</p> <p>PPPP</p> <p>Two ICPs had last actual read dates after the last day of responsibility.</p> <p>Three ICPs had last actual read dates recorded as the switch date but they should have been the day before the switch date.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Pulse will contact Gentrack for fixes.</p> <p>PPPP - human error</p>	1/07/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will contact Gentrack for fixes	1/07/2022	

Gaining trader changes to switch meter reading - switch move		
Non-compliance	Description	
Audit Ref: 4.11 With: Clause 12 Schedule 11.3 From: 01-Sep-21 To:31-Mar-22	PUNZ Three late RR files for Switch Move. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. 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
This will occur from time to time as we choose accuracy over timeliness.	24/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will try our best to not delaying the RR files.	24/05/2022	

Withdrawal of switch requests		
Non-compliance	Description	
<p>Audit Ref: 4.15</p> <p>With: Clause 17 and 18 Schedule 11.3</p> <p>From: 01-Dec-21</p> <p>To: 01-Dec-21</p>	<p>PUNZ</p> <p>Two NW files sent in error.</p> <p>PPPP</p> <p>One AW breach.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Refresher training completed for the Switching Team to correct NW errors.</p> <p>PPPP - human error</p>	24/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Refresher training completed for the Switching Team to correct NW errors.</p>	24/05/2022	

Electricity conveyed & notification by embedded generators		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: Clause 10.13</p> <p>From: 15-Jun-21</p> <p>To: 10-Dec-21</p>	<p>PUNZ</p> <p>Volumes were not quantified in accordance with the code for five ICPs with bridged meters.</p> <p>PPPP</p> <p>Volumes were not quantified in accordance with the code for four ICPs with bridged meters.</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 there is room for improvement for the management of bridged meters.</p> <p>The audit risk rating is assessed to be low due to the small number of ICPs affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Process updated for Field Services team</p> <p>Recon: Recon has resolved the issues regarding DG. A weekly report has been setup to monitor this going forward.</p> <p>Reconciliation team will work with FS on issues that involve both departments.</p> <p>PPPP - human error, not picked up in MEP notification</p>	26/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reports have been set up by Reconciliation team to prevent this going forward.	25/5/22	

Derivation of meter readings			
Non-compliance	Description		
<p>Audit Ref: 6.6</p> <p>With: Clauses 3(1), 3(2) and 5 Schedule 15.2</p> <p>From: 12-Oct-21</p> <p>To: 12-Oct-21</p>	<p>PUNZ</p> <p>ICP 2611016500CHA7C contained the losing trader's customer's read and it was not supported by two actual reads.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because this was an isolated incident, and the reading was agreed by the customer and both traders. There is strong evidence that customer readings are accurate and could be used more than they are.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>PUNZ used a non-validated reading to resolve a customer dispute – provided both retailers involved are happy with the amendment and the consumption is being accounted for. This is not our normal/preferred practice.</p>		24/05/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Training will be provided to front line customer service agents to prevent loading unreasonable customer read</p>		1/07/2022	

Interrogate meters once		
Non-compliance	Description	
<p>Audit Ref: 6.8</p> <p>With: Clause 7(1) and (2) Schedule 15.2</p> <p>From: 01-Apr-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Exceptional circumstances were not proven for all ICPs not read during period of supply.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as none as the process to manage this has been paused.</p> <p>The audit risk rating is assessed to be low as the overall percentage read is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	01/07/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	01/07/2022	

NHH meters interrogated annually		
Non-compliance	Description	
<p>Audit Ref: 6.9</p> <p>With: Clause 8(1) and (2) Schedule 15.2</p> <p>From: 01-Apr-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Exceptional circumstances were not proven for two of the ten ICPs sampled.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as none as the process to manage this has been paused.</p> <p>The audit risk rating is assessed to be low as the overall percentage read is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	01/07/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	01/07/2022	

NHH meters 90% read rate		
Non-compliance	Description	
<p>Audit Ref: 6.10</p> <p>With: Clause 9(1) and (2) Schedule 15.2</p> <p>From: 01-Jul-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Exceptional circumstances not confirmed for two ICPs on two NSPs that did not meet the 90% read rate within four months.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as none as the process to manage this has been paused.</p> <p>The audit risk rating is assessed to be low as the overall read attainment read rate is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	01/07/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	01/07/2022	

Meter data used to derive volume information		
Non-compliance	Description	
<p>Audit Ref: 9.3</p> <p>With: Clause 3(5) Schedule 15.2</p> <p>From: 01-Sep-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>NHH readings are truncated when imported into Gentrack.</p> <p>PPPP</p> <p>The MEP readings provided to John Candy Consulting by Pulse do not include decimal places.</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 rated as moderate as the NHH reads are truncated when imported into Gentrack. ICPs are no longer supplied by PPPP.</p> <p>The audit risk rating is low, because only NHH meter readings provided with decimal places are affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse is investigating this internally to find out where exactly the digits are truncated before we can put a fix in place.	1/07/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse is planning to upgrade Gentrack to process meter reading files directly from meter readers and MEPs. This will prevent truncation from happening again	1/03/2023	

Electronic meter readings and estimated readings		
Non-compliance	Description	
Audit Ref: 9.6 With: Clause 17 Schedule 15.2 From: 01-Nov-21 To: 31-Mar-22	PUNZ Zero consumption is not being monitored. Event logs not reviewed. Potential impact: Medium Actual impact: Unknown Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as event logs are not reviewed and zero consumption is not being monitored in all instances. The audit risk rating is assessed to be low, as the number of ICPs likely to be affected is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	1/07/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse plans to recommence the process to monitor unread ICPs from 1 st July 2022.	1/07/2022	

Daylight saving adjustment		
Non-compliance	Description	
<p>Audit Ref: 12.1</p> <p>With: Clause 15.36</p> <p>From: 01-Nov-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Incorrect TPM methodology used for the adjustment of daylight savings for the four ICPs where AccuCal provide the HHR data.</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>The controls are rated as strong as Pulse's original processes are robust and compliant.</p> <p>The audit risk rating is assessed to be low, as this will have only a minor effect on reconciliation.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse will correct the TPM calculation in the next available washups.	25/5/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse has been advised the correct method and we have updated our process accordingly.	25/05/22	

Creation of submission information		
Non-compliance	Description	
<p>Audit Ref: 12.2</p> <p>With: Clause 15.4</p> <p>From: 01-Sep-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</p> <p>Some ICPs were missing from submissions due to status not being corrected for vacant consumption.</p> <p>14 ICPs were missing from submissions due to status not being corrected for inactive vacant consumption resulting in 17,466 kWh.</p> <p>Shared unmetered load not submitted for three ICPs moved to the HHR profile.</p> <p>Consumption for one of three ICPs with defective meters and three of four bridged meters has not been submitted.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as weak as the process in place does not ensure that vacant consumption is submitted.</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
<p>All 14 ICPs identified with vacant consumption issues are passed to Revenue Assurance team to load meter reads to Gentrack which will feed to Cobra at the end.</p> <p>Pulse will correct the unmetered load o HHR sites in the next washups</p>		25/05/2022
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Pulse has put in place a process changes for Field Service team to improve process/management of vacant consumption.</p> <p>HHR UML not submitted: This has been corrected and the script to choose ICPs for HHR has been amended, and a report has been set up to monitor current HHR ICPs if they change to UML.</p>		25/05/2022
		Remedial action status
		Identified

Accuracy of submission information		
Non-compliance	Description	
Audit Ref: 12.7 With: Clause 15.12 From: 01-Sep-21 To: 31-Mar-22	PUNZ 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
Pulse has corrected all the issues identified.	26/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse will recommence no read process from 1 st July. Pulse has updated our Field services process for handling vacant consumption.	1/07/2022	

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: Oct to Dec-21 r14</p>	<p>PUNZ</p> <p>Some estimates were not replaced with permanent estimates by revision 14.</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 they will mitigate risk most of the time but can be compromised if time doesn't allow all processes to be run prior to the submission being due.</p> <p>The audit risk rating is assessed to be low overall as generally the % is close to 100% with the exception of R14 for November 2020.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse will tighten up the checks moving forward.	1/6/22	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Pulse has put in place an automated process to identify and fix the time-lag.</p> <p>Pulse is undergoing billing system upgrade which will ultimately resolve the date difference problem between two systems.</p>	1/6/22	

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-Sep-21</p> <p>To: 31-Mar-22</p>	<p>PUNZ</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 they will mitigate risk most of the time but can be compromised if time doesn't allow all processes to be run prior to the submission being due.</p> <p>The audit risk rating is assessed to be low overall as generally the % is achieved with the exception of the R14 submissions.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Pulse's current reconciliation system does not take average daily consumption information from the Registry which results in lower quality estimates in cases when no actual meter read is received at all. Pulse does update our default estimation settings to provide accurate estimates.	1/7/22	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Pulse is undergoing a system upgrade. The new system will utilise average daily consumption information from the previous retailer to provide more accurate estimation.	1/03/2023	