Gas Registry and Switching Material Change Audit

For

Pulse Energy

Prepared by: Tara Gannon

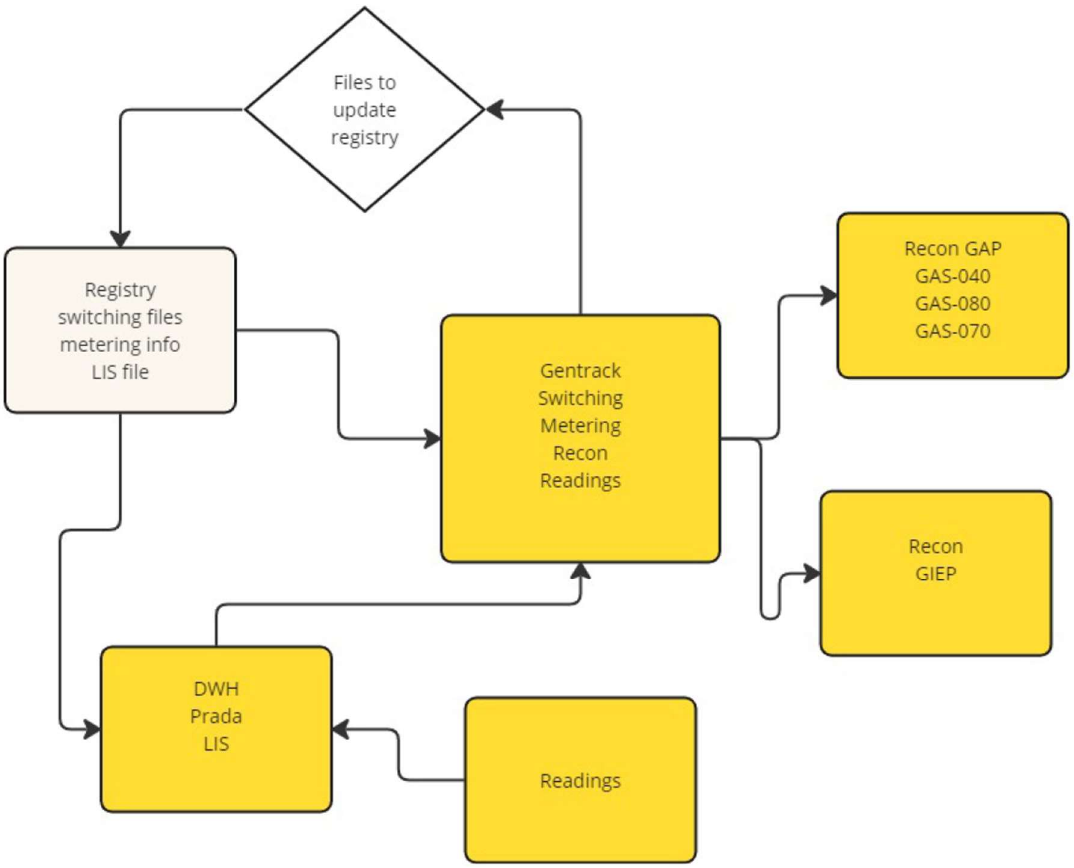
Date of Audit: March-June 2024

Date Audit Report Complete: 14 June 2024

Executive Summary

Up to 16 June 2024 **Pulse Energy Limited (Pulse)** registry and switching activity is managed by **Vector Data Services (Vector)** as Pulse's agent.

From 17 June 2024, Pulse will manage its own switching and registry information using Gentrack as shown in the diagram below.



This is considered a material change under rule 88.5 of the Gas (Switching Arrangements) Rules 2008.

88.5 *If a registry participant intends to make a change to any of its systems, processes or procedures that could reasonably be considered to be likely to have a major impact on any registry participant's compliance with these rules, it must, at least 90 days before the change is to take place, advise the industry body of the proposed change.*

This audit was conducted at the request of the Gas Industry Company (GIC) under rules 88.6 to 88.7 of the Gas (Switching Arrangements) Rules 2008. This review considers Pulse's processes to meet their obligations under the rules.

88.6 *Upon notification of a proposed change under rule 88.5 the industry body may arrange a performance audit of the registry participant to be completed at any time before, or up to 90 days after, the change is to take effect.*

88.7 *The purpose of a performance audit arranged under rule 88.6 shall be limited in scope to an audit of the impact of the proposed change on the registry participant's systems, processes and procedures.*

The summary of report findings in the table below shows that Pulse's control environment is acceptable in all areas based on the process design and test results. Provided that current discrepancies between the registry and Gentrack are resolved prior to going live, future compliance is not expected to be affected by the material change.

Summary of Report Findings

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)[1]	Compliance Rating	Comments
Participant registration information	2	-	-	Not affected by the change.
Obligation to act reasonably	3	-	-	Not affected by the change.
Obligation to use registry software competently	4	Acceptable	Compliant	Staff have been trained on registry operation.
ICP identifier on invoice	5	-	-	Not affected by the change.
Uplift of READY ICP	6	Acceptable	Compliant	The new connection process will not change except updates will be transferred directly between Gentrack and the registry instead of via Vector. There are processes in place to monitor new connections and claim ICPs within 48 hours of entering into a contract.
Maintenance of ICP information in registry	7	Acceptable	Compliant	The registry update process will not change except updates will be transferred directly between Gentrack and the registry instead of via Vector. The processes have been tested using the test registry, and the timeliness of registry updates will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

[1] Controls have been assessed as acceptable based on their design and test results. Because they are not currently in operation it is not possible to assess their effectiveness in operation.

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)[1]	Compliance Rating	Comments
Resolving discrepancies	8	Acceptable	Compliant	Discrepancies between Gentrack and the registry will be identified weekly using the gas mismatch report, which compares a gas registry list report snapshot and Gentrack's DAHistory table. An example gas mismatch report was provided as part of the audit information, and it is intended that discrepancies will be investigated and resolved weekly by the field service team. Gentrack will also provide support for resolving groups of discrepancies where necessary. Provided that current discrepancies between the registry and Gentrack are resolved prior to going live, future compliance is not expected to be affected by the material change.
Initiation of consumer switch/switching notice	9.1	Acceptable	Compliant	The process is compliant and has passed testing, with a work around in place for ICPs switching in which have previously been supplied by Pulse. Future compliance is not expected to be affected by the material change.
Response to a gas switching notice	9.2	Acceptable	Compliant	The process is compliant and has passed testing. Future compliance is not expected to be affected by the material change.
Gas acceptance notice	9.3	Acceptable	Compliant	The process is compliant and has passed testing. Future compliance is not expected to be affected by the material change.
Gas transfer notice	9.4	Acceptable	Compliant	The process is compliant and has passed testing. Future compliance is not expected to be affected by the material change.
Accuracy of switch readings	9.5	Acceptable	Compliant	The process is compliant and has passed testing. Future compliance is not expected to be affected by the material change.

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)[1]	Compliance Rating	Comments
Gas switching withdrawal	9.6	Acceptable	Compliant	The process is compliant and has passed testing. Future compliance is not expected to be affected by the material change.
Switch reading negotiation	9.7	Acceptable	Compliant	The process is compliant and has passed testing. Future compliance is not expected to be affected by the material change.

Persons Involved in This Audit

Auditor:

Tara Gannon

Provera

People who assisted with the audit:

Name	Title	Company
Marek Tomecki	Senior Reconciliation Analyst	Pulse Energy
Catherine Cooper	Office Manager	Gas Industry Company

Contents

1. Pre-Audit and Operational Infrastructure Information

1.1 Scope of Audit

Up to 16 June 2024 **Pulse** registry and switching activity is managed by **Vector** as Pulse's agent. From 17 June 2024, Pulse will manage its own switching and registry information using Gentrack as shown in the diagram below.

This audit was conducted at the request of the Gas Industry Company (GIC) under rules 88.6 to 88.7 of the Gas (Switching Arrangements) Rules 2008. This review considers Pulse's processes to meet their obligations under the rules.

88.6 *Upon notification of a proposed change under rule 88.5 the industry body may arrange a performance audit of the registry participant to be completed at any time before, or up to 90 days after, the change is to take effect.*

88.7 *The purpose of a performance audit arranged under rule 88.6 shall be limited in scope to an audit of the impact of the proposed change on the registry participant's systems, processes and procedures.*

The audit was conducted in accordance with terms of reference agreed upon by the GIC and Provera, in consultation with Pulse. The scope of the audit is limited to the processes to manage switching and registry information which are affected by this change.

The audit was carried out remotely from March 2024 to June 2024.

1.2 Audit Approach

As mentioned in **section 1.1** the purpose of this audit is to assess the performance of Pulse in terms of compliance with the rules, and the systems and processes that have been put in place to enable compliance with the rules.

This audit has examined the effectiveness of the controls Pulse has in place to achieve compliance, and where it has been considered appropriate sampling has been undertaken to determine compliance.

Where sampling has occurred, this has been conducted using the Auditing Standard 506 (AS-506) which was published by the Institute of Chartered Accountants of New Zealand. I have used my professional judgement to determine the audit method and to select sample sizes, with an objective of ensuring that the results are statistically significant.[2]

Where compliance is reliant on manual processes, manual data entry for example, the sample size has been increased to a magnitude that, in my judgement, ensures the result has statistical significance.

Where errors have been found or processes found not to be compliant the materiality of the error or non-compliance has been evaluated.

[2] In statistics, a result is called statistically significant if it is unlikely to have occurred by chance. (Wikipedia)

1.3 General Compliance

1.3.1 Summary of Previous Audit

The previous audit was conducted in 2021 by Julie Langford of Langford Consulting.

The table below shows the issues found during the audit and whether they have been resolved.

Section	Summary of issue	Rules potentially breached	Status
3	Breach notice 2021-060 The contact phone number on the registry is out of date.	10.1.1	The Market Administrator did not raise any material issues in relation to the breach.
7	Breach notice 2021-061 Pulse initiate switches without a current use of system agreement with all the relevant distributors	65.2.3	Awaiting a decision from the market administrator.
7	Breach notice 2022-062 One ICP was incorrectly identified as XTOU.	58.1	The Market Administrator did not raise any material issues in relation to the breach.
8	Breach notice 2021-062 Pulse was late entering registry values for 28 new ICPs out of 32 ICPs drawn from the maintenance breach history report.	54.1	The Market Administrator did not raise any material issues in relation to the breach.
7	Breach notice 2022-068 Three ICPs had incorrectly been recorded as having an “active” status when the meter had been removed.	58.1	The Market Administrator did not raise any material issues in relation to the breach.
9	Breach notice 2021-063 Status updates are not being done as soon as reasonably practicable.	61.1	The Market Administrator did not raise any material issues in relation to the breach.

The table below shows the recommendation made during the audit:

Section	Recommendation	Status
10	That the systems for ensuring alignment of Pulse’s systems and the registry be reviewed to ensure alignment between data sets and for resolving any discrepancies.	This recommendation has been adopted as part of the material change. A weekly gas mismatch report will be used to identify discrepancies between Gentrack and the registry.

1.3.2 Breach Allegations

Pulse has seven alleged switching breaches recorded by the Market Administrator since July 2021. A summary of the breaches is shown in the table below.

Breach notice number	Breach month	Underlying breaches	Rule allegedly breached	Details	Outcome
2021-060	Jul-21	1	10.1.1	**Raised following previous audit:** The contact phone number on the registry is out of date.	No material issues raised.
2021-061	Jul-21	2	65.2.3	**Raised following previous audit:** Pulse initiate switches without a current use of system agreement with all the relevant distributors	Awaiting a decision from the market administrator.
2021-062	Jul-21	28	54.1	**Raised following previous audit:** Pulse was late entering registry values for 28 new ICPs out of 32 ICPs drawn from the maintenance breach history report.	No material issues raised.
2021-062	Jul-21	1	58.1	**Raised following previous audit:** One ICP was incorrectly identified as XTOU.	No material issues raised.
2021-063	Jul-21	353	61.1	**Raised following previous audit:** Status updates are not being done as soon as reasonably practicable.	No material issues raised.
2022-068	Oct-22	3	58.1	**Raised following previous audit:** Three ICPs had incorrectly been recorded as having an active status when the meter had been removed.	No material issues raised.
2022-073	Dec-22	1	69.2	**Raised by Jade:** one GTA switching breach.	No material issues raised.

No breaches were alleged from the findings of this audit. Provided that current discrepancies between the registry and Gentrack are resolved prior to going live, future compliance is not expected to be affected by the material change.

1.4 Provision of Information to the Auditor (Rule 91)

In conducting this audit, the auditor may request any information from Pulse, the industry body and any registry participant. Information was provided by Pulse as it became available in accordance with this rule.

1.5 Draft Audit Report Comments

A draft audit report was provided to the industry body (GIC), the registry operator, and registry participants that I considered had an interest in the report. In accordance with rule 92.3 of the 2015 Amendment Version of the Gas (Switching Arrangements) Rules 2008, those parties were given an opportunity to comment on the draft audit report and indicate whether they would like their comments attached as an appendix to the final audit report. The following responses were received.

Party	Response	Comments provided	Attached as appendix
Pulse Energy	Received 05/06/2024 and added as a comment on the recommendation in section 8.	Yes	No

2. Participant Registration Information (Rules 7 and 10)

Processes to provide participant registration information are not affected by the material change, and are outside of the scope of this audit.

3. Obligation to Act Reasonably (Rule 34)

Pulse will continue to determine when registry and switching files are required, and their content. Future compliance is not expected to be affected by the material change.

4. Obligation to Use Registry Software Competently (Rule 35)

Currently, Vector updates registry information as Pulse's agent. Pulse's team have received training on registry operation.

5. ICP Identifier on Invoice (Rule 36)

There will be no changes to the existing invoicing processes. Future compliance is not expected to be affected by the material change.

6. Uplift of Ready ICP (Rule 54)

New connection process

Pulse confirmed that there will be no changes to the new connection process, and they will continue to liaise with the network and meter owner to ensure the connection is completed and Gentrack and the registry are updated. Pulse will continue to monitor new connections and liaise with the meter owner to obtain connection paperwork and confirm the start reading.

Currently around 99% of status and retailer updates are generated by Gentrack and transferred to Vector via SFTP, who then transfer the files to the registry. The other 1% of status updates are made directly on the registry.

After the change, the status and retailer updates generated by Gentrack will be transferred directly to the registry via SFTP, and on rare occasions such as where the event does not relate to the current time slice the update will be processed directly on the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Pulse has a key performance indicator to claim ICPs within 48 hours of entering into a contract, and compliance is monitored using work queues.

Timeliness of registry updates will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

7. Maintenance of ICP Information in the Registry (Rules 58 to 61)

Incoming registry information

Currently incoming registry files relating to changes to network and meter owner maintained information are received by Vector and transferred to Pulse every 15 minutes. The files are moved to a network directory and then automatically loaded into Gentrack for processing.

Following the change, Vector will not be involved in the process and incoming files will be transferred directly from the registry to Pulse's network using SFTP every 15 minutes. The processes to transfer files to and from Vector will be disabled. There will be no changes to the way in which Gentrack processes the incoming files.

Pulse has tested the process using the test registry and test system and future compliance is not expected to be affected by the material change.

Registry maintenance process

Retailers must use "reasonable endeavours" to maintain current and accurate information in the registry (Rule 58) and, if a responsible retailer becomes aware that information is incorrect or requires updating, they must correct or update the information "as soon as practicable" (Rule 61).

Pulse is responsible for maintaining ICP status through status updates, and the profile code, allocation group and responsible meter owner through retailer updates. All ICPs use the GGRP profile code so profile changes do not occur.

Currently around 99% of status and retailer updates are generated by Gentrack and transferred to Vector via SFTP, who then transfer the files to the registry. The other 1% of status updates are made directly on the registry.

After the change, the status and retailer updates generated by Gentrack will be transferred directly to the registry via SFTP, and on rare occasions such as where the event does not relate to the current time slice the update will be processed directly on the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

The processes have been tested using the test registry, and the timeliness of registry updates will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

8. Resolving Discrepancies (Rule 62.1)

Currently Pulse updates Gentrack and generates a file of status and retailer changes which is sent to Vector to update the registry. Following the change, Gentrack will send the status and retailer changes directly to the registry.

Discrepancies between Gentrack and the registry will be identified weekly using the gas mismatch report, which compares a gas registry list report snapshot and Gentrack's DAHistory table. An example gas mismatch report was provided as part of the audit information, and it is intended that discrepancies will be investigated and resolved weekly by the field service team. Gentrack will also provide support for resolving groups of discrepancies where necessary.

ICP and meter information

The gas mismatch report compares the following information in Gentrack and the registry:

- network,
- gas gate,
- network pressure,
- altitude,
- meter serial number,
- meter pressure,
- meter digits, and
- meter multiplier.

There is no validation of meter types, content codes or profile codes, because only non-TOU meters with an uncorrected register content codes and the GGRP profile code are expected to be supplied.

Because this data has not historically been validated by Pulse, the initial reports show over 900 discrepancies mostly relating to altitude discrepancies. I recommend that all these discrepancies are resolved prior to going live, particularly for the seven altitude discrepancies of over ±20m, the 13 meter pressure discrepancies and two meter number discrepancies which could result in the accuracy thresholds in NZS5259 being breached.

Allocation groups

Monthly, Pulse will generate a report from Gentrack showing each ICP's monthly consumption in GJ for the last 12 months, and total consumption in GJ for the last 12 months. The report will be opened in excel and each ICP's current allocation group will be retrieved from a registry list report using a vlookup.

Pulse will review the report to identify ICPs which have consumption higher or lower than what is expected for their allocation group. Following investigation to determine whether the consumption is genuine or caused by misreads, the allocation groups will be changed on the registry and then transferred to Gentrack.

I reviewed reports used in the process and future compliance is not expected to be affected by the material change.

Conclusion

Future compliance is not expected to be affected by the material change, provided that the existing discrepancies are resolved prior to going live, and new discrepancies are resolved weekly.

Recommendation	Audited party comment
Resolve the current discrepancies in the gas meter mismatch report prior to going live. If this is not completed, particularly for the seven altitude discrepancies of over ±20m, the 13 meter pressure discrepancies and two meter number discrepancies, it could result in the accuracy thresholds in NZS5259 being breached.	We will endeavour to resolve the discrepancies as soon as possible. The two meter number discrepancies, are two meters that are being removed and replaced at the moment. This should be resolved in the next few days.

Recommendation	Audited party comment
	Regarding the seven Altitude and 13 meter pressure discrepancies, I will work with the Field services team to correct these manually. This should be quicker than waiting on Gentracks data fix. I will update the Auditor once these have all been corrected.

9. Switching

Currently all outgoing switching files are produced by Gentrack and placed in a folder on Pulse's network. The files are transferred to Vector every 15 minutes, and Vector transfers the files to the registry. Incoming switching files are received by Vector and transferred to Pulse every 15 minutes. The files are moved to a network directory and then automatically load into Gentrack for processing.

Following the change, Vector will not be involved in the process and incoming and outgoing files will be transferred directly from Pulse's network to the registry, and from the registry to Pulse's network using SFTP. The processes will run every 15 minutes. There will be no changes to the way in which Gentrack prepares or processes switching files. Registry acknowledgements will be loaded into Gentrack and error queues will be created where failures are identified.

Gentrack has work queues, and notifications will be sent to the switching team when files need to be processed or require human intervention. Any queue items which become urgent or overdue will be highlighted and highly visible in the work queue.

The switch breach history report will also be reviewed twice daily to identify any files which are close to falling due so that they can be actioned.

Pulse has tested the process using the test registry and test system and future compliance is not expected to be affected by the material change.

9.1 Initiation of Consumer Switch/Switching Notice (Rules 65 to 67)

There will be no changes to the process to generate GNTs using Gentrack. Following the change files will be transferred directly from Pulse's Network to the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Pulse provided examples of GNTs created by Gentrack and I confirmed that they were consistent with the requirements of the registry functional specification. Testing also showed that the outgoing GNT files were successfully transferred to and from the test registry, and error queues were generated if a successful acknowledgement was not received and appear in the "Gas Gain Switch Failed Acknowledgement" queue.

Testing found a GNT was not generated correctly where an ICP had previously been supplied by Pulse and was to switch back in. Pulse has put a work around in place which has been tested and is operating correctly, and a permanent fix was released to production by 14 June 2024.

Timeliness of switching files will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

9.2 Response to a Gas Switching Notice (Rules 69 to 75)

Within two business days of receiving a gas switching notice, the responsible retailer must provide to the registry:

- a gas acceptance notice (GAN), or
- a gas transfer notice (GTN), or
- a gas switching withdrawal notice (GNW).

There will be no change to the process to generate GAN, GTN and GNW files using Gentrack. Following the change files will be transferred directly from Pulse's Network to the registry, instead of via Vector to the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Timeliness of switching files will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

9.3 Gas Acceptance Notice (Rule 70)

There will be no changes to the process to generate GTNs using Gentrack. Following the change files will be transferred directly from Pulse's Network to the registry, instead of via Vector to the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Pulse provided examples of GANs created by Gentrack and I confirmed that they were consistent with the requirements of the registry functional specification. Testing also showed that the incoming GNT was correctly processed and the GTN was subsequently issued. Files were successfully transferred to and from the test registry.

Gentrack manages the read renegotiation process using work queues including:

- Gas Loss Failed Acknowledgement, and
- Gas Approve Loss Request.

Users work through the queue items and action them before closing the task.

If the GNT date is before Gentrack's final bill date or last invoice date, the ICP will appear in the "Gas Switching Loss Error Queue".

Timeliness of switching files will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

9.4 Gas Transfer Notice (Rule 72)

There will be no changes to the process to generate GTNs using Gentrack. Following the change files will be transferred directly from Pulse's Network to the registry, instead of via Vector to the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Pulse provided examples of GNTs created by Gentrack and I confirmed that they were consistent with the requirements of the registry functional specification. Testing also showed that the incoming GNT was correctly processed and the GAN was issued before the GTN. Files were successfully transferred to and from the test registry.

Any ICPs requiring a GTN will be visible in the "Gas Loss Not Completed" work queue in Gentrack.

Timeliness of switching files will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

9.5 Accuracy of Switch Readings (Rule 74)

There will be no changes to the process to determine switch event readings using Gentrack. Future compliance is not expected to be affected by the material change.

9.6 Gas Switching Withdrawal (Rules 74A, 75, 76, 78)

There will be no changes to the process to generate GNW and GAW files using Gentrack. Following the change files will be transferred directly from Pulse's Network to the registry, instead of via Vector to the registry. Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Pulse provided examples of GNW and GAW files created by Gentrack and I confirmed that they were consistent with the requirements of the registry functional specification. Testing also showed that end to end process for withdrawals is working as expected. Files were successfully transferred to and from the test registry.

Gentrack manages the read renegotiation process using work queues including:

- Gas Gain Post Switch Withdrawal Complete - Review Bill Reversal, and
- Gas Loss Post Switch Withdrawal Complete - Review Bill Reversal.

Users work through the queue items and action them before closing the task.

Timeliness of switching files will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

9.7 Switch Reading Negotiation (Rule 79, 81)

There will be no changes to the process to generate GNC and GAC files using Gentrack. Following the change files will be transferred directly from Pulse's Network to the registry.

Acknowledgement files from the registry are imported into Gentrack and directed to an error queue for review and action if an error code is received.

Pulse provided examples of GNC and GAC files created by Gentrack and I confirmed that they were consistent with the requirements of the registry functional specification. Testing also showed that the end-to-end process for read renegotiation is working as expected. Files were successfully transferred to and from the test registry.

Gentrack manages the read renegotiation process using work queues including:

- Gas Switch Confirm Dispute Reading,
- Gas Acceptance of Read Dispute, and
- Gas Rejection of Read Dispute.

Users work through the queue items and action them before closing the task.

Timeliness of switching files will be checked in the first audit after the changes go live. Future compliance is not expected to be affected by the material change.

10. Bypass of Distributor (Rule 82)

Pulse is not the retailer on a bypass network, so they do not have responsibilities under this Rule.

11. Recommendations

As a result of this audit, I have made one recommendation:

Report section	Recommendation
8	Resolve the current discrepancies in the gas meter mismatch report prior to going live. If this is not completed, particularly for the seven altitude discrepancies of over ±20m, the 13 meter pressure discrepancies and two meter number discrepancies, it could result in the accuracy thresholds in NZS5259 being breached.

Appendix 1 – Control Rating Definitions

Rating	Definition
Ineffective	The design of controls overall is ineffective in addressing key causes and/or consequences. Documentation and/or communication of the controls does not exist (e.g., policies, procedures, etc.). The controls are not in operation or have not yet been implemented.
Needs improvement	The design of controls only partially addresses key causes and/or consequences. Documentation and/or communication of the controls (e.g., policies, procedures, etc.) are incomplete, unclear, or inconsistent. The controls are not operating consistently and/or effectively and have not been implemented in full.
Acceptable	The design of controls is largely adequate and effective in addressing key causes and/or consequences. The controls (e.g., policies, procedures, etc.) have been formally documented but not proactively communicated to relevant stakeholders. The controls are largely operating in a satisfactory manner and are providing some level of assurance.
Effective	The design of controls is adequate and effective in addressing the key causes and/or consequences. The controls (e.g., policies, procedures, etc.) have been formally documented and proactively communicated to relevant stakeholders. The controls overall, are operating effectively so as to manage the risk.

Appendix 2 – Impact Rating Definitions

Rating	Definition
Insignificant	A small number of issues with registry file timeliness and/or accuracy. Negligible impact on other participants or consumers. Did not prevent the process completing. A small number of issues with the accuracy and/or timeliness of files to the Allocation Agent. Corrections were made by the interim allocation. A small number of issues not related to registry or allocation information.
Minor	Some issues with registry file timeliness and/or accuracy. Minor impact on other participants or consumers. Did not prevent the process completing. Some issues with the accuracy and/or timeliness of files to the Allocation Agent. Corrections were made by the interim allocation. A small number of issues not related to registry or allocation information.
Moderate	A moderate number of issues with registry file timeliness and/or accuracy. Moderate impact on other participants or consumers. Did prevent some processes completing. A moderate number of issues with the accuracy and/or timeliness of files to the Allocation Agent. Corrections were not made by the interim allocation. A moderate number of issues not related to registry or allocation information.
Major	A significant number of issues with registry file timeliness and/or accuracy. Major impact on other participants or consumers. Did prevent some processes completing. A significant number of issues with the accuracy and/or timeliness of files to the Allocation Agent. Corrections were not made by the interim allocation. A significant number of issues not related to registry or allocation information.

Appendix 3 – Remedial Rating Definitions

Rating	Definition
Completed	The alleged breach and impact have been resolved. Systems and processes are now compliant.
In progress	Steps are being taken to resolve the alleged breach and impact and ensure systems and processes are compliant.
No action	Participant undertakes no action to resolve or address auditor controls or impact assessments for commercial reasons.

Appendix 4 – Pulse Comments

Pulse provided one comment, which has been added to the recommendation in section 8.