Gas Registry and Switching Material Change Audit

For

Contact Energy Ltd

Prepared by: Tara Gannon

Date of Audit: July – September 2025

Date Audit Report Complete: 26 September 2025

Executive Summary

Contact Energy Limited (Contact) currently submits all ICP volumes as non-TOU. From 1 October 2025, Contact intends to switch in and supply 63 allocation group 1 and 2 TOU ICPs, including two ICPs for direct connect gas gates where allocation submissions are not required.

Field work, registry updates and switching will use the same processes and systems as Contact's existing non-TOU ICPs.

For ICPs connected to allocated gas gates, **Arthur D. Riley and Company Limited (ADR)** will collect meter data for AG2 ICPs and **Bluecurrent Assets NZ Limited (Bluecurrent)** will collect meter data for AG1 ICPs, receive meter data for AG2 ICPs from ADR, and validate and convert the readings to volumes. These volumes will be provided to Contact and used to produce invoices and allocation submissions.

Contact will monitor for changes to ICP information, and communicate these to their agents as necessary to ensure that all TOU ICPs are scheduled to be read, and that the agents hold current information on each ICP.

Training and training documentation has been provided to each affected team leader and training will be completed prior to switching in the ICPs. The end to end process has been tested.

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 Contact Energy'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 Contact's control environment is acceptable in all areas based on the process design and test results. Provided that Contact adopts the following recommendations, future compliance is not expected to be affected by the change:

- confirm corrector details (including register content) and identify faults, outages and changes to TOU ICP, meter and corrector information and communicate them to Bluecurrent,
- consider implementation of a regular reconciliation between Contact and Bluecurrent's records to ensure that ICP, meter and corrector data is consistent,
- test meter and corrector change processes, including ensuring that they correctly flow through to submission data,

- test read renegotiation processes, and develop a process to communicate any instances where the agreed switch event reading changes or is inconsistent with meter reading data to Bluecurrent,
- expand the monthly allocation group review to identify AG4 and AG6 ICPs with actual or estimated consumption over 10,000 GJ p.a. so that TOU metering can be installed and the ICP moved to AG1 if the TOU meter has telemetry, or AG2 if the TOU meter does not have telemetry, and
- resolve historic data discrepancies, if possible, to enable new TOU exceptions to more easily be identified.

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	Some switching and retailer information updates may be completed directly on the registry, and staff who complete these updates have been trained.
ICP identifier on invoice	5	-	-	Not affected by the change.
Uplift of READY ICP	6	Acceptable	Compliant	The new connection process for non-TOU ICPs will not change. No TOU new connections are expected, but if completed they will follow the same process as non-TOU new connections except Bluecurrent will be advised and provided with ICP and meter set up information.
Maintenance of ICP information in registry	7	Acceptable	Compliant	The process to maintain non-TOU ICP information will not change, and TOU ICPs will follow the same processes except for incoming metering information because full metering details are not recorded on the registry. Registry maintenance processes have been successfully tested.

[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	Contact will continue to run and review a monthly suite of validation reports, which will include TOU ICPs. Exceptions will be investigated and corrected. Under their agreement with Bluecurrent, Contact is to advise Bluecurrent of any outages, faults and changes to ICP or meter information. Contact intends to develop queries to identify ICPs with static and meter data changes, so that these can be communicated to Bluecurrent promptly and manual workarounds may be required until these processes are implemented. Some minor recommendations for improvements to the discrepancy management process were identified, including: • expanding the allocation group checks to identify ICPs where consumption is over 10,000 GJ p.a. so that TOU metering can be installed and the ICP moved to AG1 if the TOU meter has telemetry, or AG2 if the TOU meter does not have telemetry, • working through a backlog of ICPs potentially requiring allocation group changes, and • resolving existing static data discrepancies if possible.
Initiation of consumer switch/switching notice	9.1	Acceptable	Compliant	Switch gain processes have been successfully tested.
Response to a gas switching notice	9.2	Acceptable	Compliant	Contact does not expect to receive any incoming GNTs in the short term because all ICPs will have a fixed contract term. Switch loss processes have been confirmed and successfully tested.

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)[1]	Compliance Rating	Comments
Gas acceptance notice	9.3	Acceptable	Compliant	Contact does not expect to process any switch losses in the short term because all ICPs will have a fixed contract term. GAN files will be automatically generated by SAP and have been successfully tested.
Gas transfer notice	9.4	Acceptable	Compliant	Contact does not expect to process any switch losses in the short term because all ICPs will have a fixed contract term. GTN files will be created manually on the registry, using readings provided by Bluecurrent following receipt of a GNT file into SAP. The switching process has been successfully tested up to the point of SAP creating a CL21 BPEM which alerts the switching team that a manual GTN is required. Contact is able to successfully create manual GTN files via the registry user interface.
Accuracy of switch readings	9.5	Acceptable	Compliant	As TOU ICPs should receive regular actual readings it is likely that switches will be completed on actual readings and read renegotiations will not be required. Future compliance is not expected to be affected by the material change, provided that any instances are advised to Bluecurrent where the agreed switch event reading changes or is inconsistent with meter reading data, and the read change processes are successfully tested. Contact is able to generate GNC and GAC files directly on the registry in the event that SAP is unable to generate the file.
Gas switching withdrawal	9.6	Acceptable	Compliant	Switch withdrawal processes have been successfully tested.
Switch reading negotiation	9.7	Acceptable	Compliant	As for **section 9.5**, TOU ICPs should receive regular actual readings it is likely that switches will be completed on actual readings and read renegotiations will not be required. Future compliance is not expected to be affected by the material change, provided that any instances are advised to Bluecurrent where the agreed switch event reading changes or is inconsistent with meter

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)[1]	Compliance Rating	Comments
				reading data, and the read change processes are successfully tested. Contact is able to generate GNC and GAC files directly on the registry in the event that SAP is unable to generate the file.
Bypass distributor	10	-	-	Not applicable

Persons Involved in This Audit

Auditor:

Tara Gannon

Provera

People who assisted with the audit:

Name	Title	Company
Avtar Singh	Operations Team Leader	Contact Energy
Aaron Wall	Portfolio Analyst	Contact Energy
Lauren Ireland	Senior Business Analyst	Contact Energy
Maryanne Anderson	OSX New Connections Team Leader	Contact Energy
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Contents

1. Pre-Audit and Operational Infrastructure Information

1.1 Scope of Audit

Contact Energy currently submits all ICP volumes as non-TOU. From 1 October 2025, Contact intends to switch in and supply 63 allocation group 1 and 2 TOU ICPs, including two ICPs for direct connect gas gates where allocation submissions are not required.

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 Contact'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 Contact. 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 in July to September 2025.

1.2 Audit Approach

As mentioned in **section 1.1** the purpose of this audit is to assess the performance of Contact 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 Contact 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 completed in January 2024 by Tara Gannon of Provera. The table below shows the issues found during the audit and whether they have been resolved.

Section in this report	Summary of issue	Rules potentially breached	Status
6	**Alleged breach 2024-017:** Registry not populated within two business days of Contact entering into a contract to supply gas to a consumer for 22 of 30 new connections checked.	54.1	Awaiting a determination from the market administrator.
7	**Alleged breach 2024-018:** ICP status was not updated on the registry as soon as practicable for 56 of the 100 late updates checked. The registry was not updated as soon as practicable for 12 of the 25 late retailer updates checked.	61.1	Awaiting a determination from the market administrator.
8	**Alleged breach 2024-019:** Contact did not consistently use best endeavours to identify and resolve discrepancies, and some discrepancies have been present for extended periods. Depending on the fields affected the discrepancies can result in gas conversion or reconciliation submission errors, and some of the discrepancies caused errors outside the maximum permissible errors in NZS 5259. 16 of the 24 ICPs with ACTV or ACTC status where the registry recorded a meter identifier of "REMOVED" were confirmed to have an incorrect status and were updated to a removed or removed or decommissioned connection status during the audit. Ten out of ten ICPs sampled from a population of 545 ICPs with a meter removed connection status and a meter recorded by the meter owner had an incorrect status recorded by Contact. All ten were corrected to ACTC-GAS during the audit. 119 ICPs with ACTC or ACTV status had different allocation groups recorded in SAP and the registry. A sample of 20 were checked during the audit and found SAP was incorrect, and SAP was then updated. 20 out of 20 ICPs sampled from a population of 119 ICPs with allocation group discrepancies had an incorrect allocation group recorded in SAP. All 20 were corrected during the audit. 28 ICPs had an incorrect NSP recorded in SAP. For 21 of the ICPs with both gas gates connected to the same notional delivery point the gas gates were corrected in SAP during the audit. The other seven ICPs have SAP and registry gas gates that do not have the same notional delivery point and will be	62.1	Awaiting a determination from the market administrator.

Section in this report	Summary of issue	Rules potentially breached	Status
	corrected in the back end of the database from the correct effective date by the SAP team. 68 out of 68 ICPs sampled from a population of 9,000 ICPs with a different altitude recorded in SAP and the registry had an incorrect altitude recorded in SAP. 67 out of 68 were corrected during the audit and ICP 0000796051QTD51 should have an altitude of 84 but remains at 46. Eight of the errors resulted in altitude factors which were over the maximum permissible error in NZS 5259. Four of a sample of 170 ICPs checked had an incorrect altitude recorded in SAP, but the altitude was consistent with the registry value. One of the differences was over the maximum permissible error in NZS 5259. One out of 21 ICPs with zero altitude had an incorrect altitude recorded in SAP, but the altitude was consistent with the registry value. The difference was within the maximum permissible error in NZS 5259. 13 ICPs had incorrect meter numbers recorded in SAP and were corrected during the audit. Five ICPs had incorrect meter digits recorded and were corrected during the audit. Eight out of 16 ICPs with meter pressure differences had an incorrect meter pressure recorded in SAP and were corrected during the audit. Four of the differences were over the maximum permissible error in NZS 5259. Five pressure corrections had differences over the maximum permissible error in NZS 5259 and should have been corrected from the effective date rather than the next billed date.		
9.1	**Alleged breach 2024-020:** One of a sample of 20 standard GNTs (ICP 0001438966QTA4F GNT-9762699 30 August 2021 9:04:11 AM) was not issued within two business days of entering into a contract to supply gas. This was caused by a delay in issuing a new GNT for the correct ICP after a wrong property withdrawal.	66.1	Awaiting a determination from the market administrator.
9.1	**Alleged breach 2024-021 and 2024-022:** A NTD breach was recorded for ICP 1001242949QT115 GNT-9206576 24 July 2020, 14:13:01 because a requested switch date prior to the GNT issue date was recorded for a standard switch. Nine of a sample of 20 switch move GNTs had requested switch dates earlier than the date the GNT was issued. Eight were caused by delay in issuing a new GNT for the correct ICP after a wrong property withdrawal, and one was caused due to confusion where two applications were received by the customer.	67.3	Awaiting a determination from the market administrator.

Section in this report	Summary of issue	Rules potentially breached	Status
9.2	**Alleged breach 2024-023:** 1001257758NG8F1's switch on 1 November 2022 recorded a GAN, GNW and GTN breach because a response to the gaining retailer's GNT was not issued to the registry within two business days of receipt. The registry's switch breach history report is primarily used to identify switching files that are due, but for an unknown reason the ICP was omitted from the report for 1 to 3 November 2022 leading to late identification of the overdue file.	69.1	Awaiting a determination from the market administrator.
9.3	**Alleged breach 2024-024:** Three GANs had incorrect response codes applied by SAP. There is a low impact because the other retailer could determine the correct ICP status from registry status records.	70.3	Awaiting a determination from the market administrator.
9.3	**Alleged breach 2024-025:** Two switch move GANs had event dates before the GNT requested date applied manually; both switches were completed from the gaining retailer's requested date. 15 switch move GANs had event dates more than ten business days after NT receipt applied by SAP. Ten of the switches were withdrawn, and the other five switches were completed effective from the gaining retailer's requested date. The issue occurred primarily because the gaining retailer's GNT was backdated, making it more difficult to comply with the requirement to determine a switch date which is within ten business days of GNT receipt.	70.2.2	Awaiting a determination from the market administrator.
9.4	**Alleged breach 2024-026:** Two GTA breaches where the GTN was issued more than ten business days after receipt of the AN. The impact was low because the files were one and three business days overdue. Almost all GTNs were issued on time. The registry's switch breach history report is primarily used to identify switching files that are due, but for an unknown reason one of the ICPs was omitted from the report for 1 to 3 November 2022 leading to late identification of the overdue file. Controls could be improved by placing more reliance on the BPEM process.	70.2.2	Awaiting a determination from the market administrator.
9.6	**Alleged breach 2024-027:** ICP 0000100341QT79C GNW-10258710 26 October 2022 11:27:19 AM appears to have been issued in error possibly because the wrong ICP was selected and was rejected by the other retailer.	75.1	No material issues raised.

The table below shows the status of recommendations made during the January 2024 audit:

Section	Recommendation	Status
7	Develop processes to identify switches and registry updates that are backdated more than one year, and require reconciliation data corrections and communicate them to the reconciliation team so that a correction can be processed. I suggest running an event detail report, and calculating the number of days between the event entry date/time and event date, then filtering on events where the number of days is greater than 365. Events that should be investigated to determine whether a correction is required include: • GAC where the file is accepted by Contact or another retailer, • GTN where an ICP is switching to or from Contact, • GAW where the withdrawal is accepted by Contact or another retailer, and • status changes. Develop a process to communicate changes to ICP data which could cause conversion errors outside the maximum permissible errors in NZS 5259 where the change is backdated by more than one year, or the change is not processed in SAP from the effective date.	Adopted, with a one off report of backdated switches provided to the reconciliation team since 1 January 2025, and is now run monthly.
8	Develop a process to review and resolve discrepancies between the allocation group recorded in SAP and the registry for each ICP.	Adopted. A query is used to validate allocation groups in SAP against the registry monthly. A further recommendation is made in this audit to update incorrect allocation groups more promptly.
8	Improve validation of altitudes against the registry to ensure that exceptions are checked and resolved promptly. The audit found 9,000 differences between the altitudes recorded in SAP and the registry.	Adopted. Altitudes are validated as part of monthly validation reporting.
8	Improve validation of statuses against the registry to ensure that exceptions are checked and resolved promptly. The November 2023 status validation found 3,000 status discrepancies between SAP and the registry.	Adopted. Statuses are validated as part of monthly validation reporting.
8	Consider validating the meter number installed and meter digits against the registry. Reliance is currently placed on MRS processes, but because meters are only read every two months exceptions may not be promptly identified and resolved.	Not adopted, but Contact will consider adopting this in the future.

Section	Recommendation	Status
	Review of a sample of 25 out of 86 meter number differences found 13 incorrect meter numbers which had not been identified and corrected through the existing processes. Review of 20 digit differences found five ICPs with incorrect meter digits which had not been identified and corrected through the existing processes.	
8	Check the pressure values for ICPs with network pressure the same as or less than meter pressure. This can be valid, but is uncommon and may indicate that the network pressure or meter pressure is recorded incorrectly.	Adopted. Pressures are validated as part of monthly validation reporting.
8	Consider validating meter multiplier in SAP and the registry, even a periodic check that there are no multipliers greater than 1 in SAP or the registry will ensure ICPs with multipliers are identified.	Not adopted, but Contact will consider adopting this in the future.
9.4	Rule 72.1.3 requires GTN notices to contain "an annualised consumption (in gigajoules) estimate for the ICP", but it does not stipulate that the estimate must be accurate; therefore, I have not alleged a breach, but I recommend Contact reviews the annualised consumption calculation logic as it relates to "clocked" meters to ensure accuracy.	In progress. The ICT team is developing a solution for GTNs produced by SAP. TOU GTNs will be produced manually and are not affected by this recommendation.

1.3.2 Breach Allegations

Contact has 14 alleged switching breaches recorded by the Market Administrator since January 2024, 11 were alleged as part of the previous audit and the other three related to GAN content. A summary of the breaches is shown in the table below.

Breach notice number	Breach month	Underlying breaches	Rule allegedly breached	Details	Outcome
2024-001	Jan 2024	1	70.2	GAN content.	No material issues raised.
2024-005	Jan 2024	2	70.2		
2024-006	Mar 2024	2	70.2		
2024-017	Mar 2024	22	54.1	Raised following the January 2024 audit and described in **section 1.3.1**.	Awaiting a determination from the market administrator.
2024-018	Mar 2024	68	61.1		
2024-019	Mar 2024	297	62.1		
2024-020	Mar 2024	1	66.1		
2024-021	Mar 2024	10	67.3		

Breach notice number	Breach month	Underlying breaches	Rule allegedly breached	Details	Outcome
2024-022	Mar 2024	10	69.1		
2024-023	Mar 2024	1	70.3		
2024-024	Mar 2024	3	70.2.2		
2024-025	Mar 2024	17	70.2.2		
2024-027	Mar 2024	1	54.1		
2024-026	Mar 2024	2	75.1		No material issues raised.

No non conformances were identified during this audit.

1.4 Provision of Information to the Auditor (Rule 91)

In conducting this audit, the auditor may request any information from Contact, the industry body and any registry participant. Information was provided by Contact 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.

Party	Response	Comments provided	Attached as appendix
Contact Energy	Yes	Yes	Included in the body of the report in the recommendation boxes and comments section.

2. Participant Registration Information (Rules 7 and 10)

Processes to provide participant registration information are not affected by supply of TOU ICPs, and are outside of the scope of this audit.

3. Obligation to Act Reasonably (Rule 34)

Contact will continue to use the registry maintain ICP information and switch ICPs, and future compliance is not expected to be affected by supply of TOU ICPs.

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

Contact will continue to use the registry software.

5. ICP Identifier on Invoice (Rule 36)

Contact provided copies of invoices for TOU ICPs generated from their test system, and the ICP number was present. Future compliance is not expected to be affected by supply of TOU ICPs.

6. Uplift of Ready ICP (Rule 54)

The new connection process for non-TOU ICPs will not change. No TOU new connections are expected, but if completed they will follow the same process as non-TOU new connections except Bluecurrent will be advised and provided with ICP and meter set up information. Future compliance is not expected to be affected by the material change.

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

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).

Processes to maintain ICP information will be the same for TOU and non-TOU ICPs, except for metering details because full metering details are not recorded on the registry for TOU ICPs. The process to maintain non-TOU ICP information will not change.

Contact will monitor for changes to ICP information, and communicate these to ADR and Bluecurrent as necessary to ensure that all TOU ICPs are scheduled to be read, and that the agents hold current information on each ICP.

Status updates

TOU ICPs will have service orders raised and monitored using ORB. Paperwork returned from contactors includes the date work is completed, ICP status, connection status, and readings if they are available. The information is imported or manually entered into ORB depending on the party which completed the work, and then transferred from ORB to SAP. A workflow error is created if ORB is unable to update all the required fields in SAP and staff manually check and correct the issue. SAP will then update the registry.

Where ICPs are decommissioned by a distributor, the update will be imported into SAP as part of the overnight synchronisation process.

Retailer updates

Retailer updates can be made directly on the registry and imported into SAP as part of the overnight synchronisation process, or in SAP which is then synchronised to the registry.

Distributor and meter owner updates

Distributor changes to ICP information including decommissioned statuses will be imported into SAP as part of the overnight synchronisation process. BPEMs (business process exception management

items) will be generated and reviewed where any of these updates fail to load, and discrepancies for key fields will also be identified through monthly validation.

Limited meter owner information is recorded on the registry for TOU meters; meter pressure, multiplier and digit fields record n/a and no corrector information is recorded apart from the corrector owner. If a meter owner changes a meter identifier the information will be imported into SAP as part of the overnight synchronisation process. Contact will be alerted to the change via a BPEM, so that the meter change can be processed manually. Other meter and corrector changes will be identified through receipt of work completion paperwork from the meter owner.

The corrected register is used for submission purposes, and Contact will ensure that the corrected register is loaded in SAP with the site ID so that the validated and converted GJ volumes provided by Bluecurrent can be ingested and used to create invoices and allocation submissions. The meter creation, read import, invoicing, GAS050 TOU volumes and GAS070 billed volumes submissions have been successfully tested end to end.

Provision of information to Bluecurrent

Prior to switch in, Contact will provide information on each ICP to Bluecurrent by populating a Flow2E Setup template with a row for each ICP including:

- ICP, site name and site address,
- meter number and site ID (treated as the corrector number) and meter type (TOU or non-TOU),
- registry physical gas gate, and the associated pipeline, receipt point, delivery point and gas type which are determined from OATIS information,
- registry meter owner,
- registry ICP altitude,
- registry network pressure,
- parameters used as inputs for data validation which are determined from analysis of historic meter reading information for each ICP with Bluecurrent's assistance:
    - minimum and maximum expected meter pressure,
    - minimum and maximum expected corrected volume, and
    - maximum daily quantity.

Contact will separately provide the corrected register content code and multiplier (if greater than one), which will be confirmed with the meter owner where Bluecurrent does not already read the meter and hold the information. This information is currently being collected.

Under their agreement with Contact, Bluecurrent will manage meter master data including new meter set up, meter configuration and tracking of meter changes. Contact is to advise Bluecurrent of any outages, faults and changes to ICP or meter information. Contact intends to develop queries to identify ICPs with static and meter data changes, so that these can be communicated to Bluecurrent promptly and manual workarounds may be required until these processes are implemented. If any information is missing, Bluecurrent's agreement with Contact indicates they will obtain the information from the registry.

Conclusion

Timeliness will be checked in the first audit after the changes go live. Provided that the recommendations to confirm corrector details and identify faults, outages and changes to TOU ICP,

meter and corrector information and communicate them to Bluecurrent are adopted, future compliance is not expected to be affected by supply of TOU ICPs.

Recommendation	Audited party comment
Confirm the process to identify changes to TOU ICP static data, and confirm how these changes will be communicated to Bluecurrent promptly.	The Energy & Reconciliation team will monitor exception management reports to identify any changes to gas TOU ICP static data and this will be provided promptly to Bluecurrent. A system enhancement will be prioritised to ingest gas registry list files daily into the exception management tool to enable this process.
Confirm the process to identify changes to TOU meter or corrector data, and confirm how these changes will be communicated to Bluecurrent promptly.	Contact will instruct all gas TOU meter owners to notify Contact of any changes to gas TOU meters or correctors via a dedicated mailbox. The Switching team will monitor this inbox and will promptly notify Bluecurrent of any changes.
Confirm the process to identify TOU meter outages or faults and communicate them to Bluecurrent promptly.	Contact will ask all gas TOU customers to notify their Contact Account Manager of any planned outages or faults of which the customer is aware. On receipt of any notification, the Account Manager will notify the Switching team who will in turn promptly notify Bluecurrent. For unplanned outages or faults at AG1 sites, Bluecurrent will be the first to know via daily reading of these meters. For unplanned outages or faults at AG2 sites, Contact will instruct our meter reading contractor ADR to promptly notify our Switching team who will in turn promptly notify Bluecurrent.
Test meter and corrector change processes, including ensuring that they correctly flow through to submission data.	These processes will be tested during October 2025. This will include reviewing and/or testing Bluecurrent's part of the process.
Collect the corrected register content code and multiplier (if greater than one) information from the meter owner and provide it to Bluecurrent in an agreed format.	This information is currently being collected and will be provided to Bluecurrent by 1 October 2025.

8. Resolving Discrepancies (Rule 62.1)

I checked whether supplying TOU ICPs would affect compliance with Rule 62.1.

Contact will continue to run and review a monthly suite of validation reports as described below, which will include all ICPs supplied by Contact. Where errors are found in attributes affecting gas conversion or billing, SAP can be corrected effective from a date after the customer's last invoice date, unless the invoice(s) are reversed or the SAP team changes the data in the back end.

Under their agreement with Bluecurrent, Contact is to advise Bluecurrent of any outages, faults and changes to ICP or meter information. As discussed in **section 7**, Contact intends to develop queries

to identify ICPs with static and meter data changes, so that these can be communicated to Bluecurrent promptly and manual workarounds may be required until these processes are implemented.

ICP status and connection status

ICP status and connection status will continue to be validated using the monthly gas connection mismatch report which identifies:

- discrepancies between the SAP and registry ICP and connection status, including ICPs in SAP but not with Contact on the registry list and ICPs on the registry list but not in SAP,
- ICPs with metered connection statuses where no meter is open in SAP, and
- ICPs with an unmetered connection status where a meter is open in SAP.

I reviewed the report generated on 19 August 2025 and found there were only three genuine mismatches, which were under investigation. The previous audit backlog of status discrepancies has been resolved.

Allocation groups

Allocation groups will continue to be validated against the registry monthly using the gas ICP type code discrepancies – allocation group report. I reviewed the report generated on 21 August 2025 and found there were 93 mismatches.

Contact will also continue to complete a monthly review of allocation groups for gas ICPs supplied for 100 days of more:

- a report is generated of ICPs in AG6 with actual consumption over 250 GJ p.a.; the consumption is monitored for up to two months to determine whether it is genuine and the ICP will be moved to AG4 and monthly meter reading,
- a report is generated of all ICPs in AG4; where an ICP is in AG4, but consumption falls below 230 GJ p.a., Contact leaves the ICP in AG4 and a monthly meter reading round in case their consumption increases - the rules state that any ICP not assigned to allocation groups 1-4, should have a meter installed and be assigned to AG5 or AG6, and this is compliant.

To ensure future compliance, Contact should add a step to identify AG4 and AG6 ICPs with actual or estimated consumption over 10,000 GJ p.a. so that TOU metering can be installed and the ICP moved to AG1 if the TOU meter has telemetry, or AG2 if the TOU meter does not have telemetry.

Network and gas gate

There will be no changes to gas gate validation. Current values for gas gates and networks are validated against the registry monthly using the gas gate code discrepancy and gas network distributor discrepancy reports, with corrections made as necessary.

ICP altitude

There will be no changes to ICP altitude validation. Current values for altitudes are validated against the registry monthly using the gas altitude discrepancy report, with corrections made as necessary.

Network pressure

There will be no changes to network pressure validation. Current values for network pressure are validated against the registry monthly using the gas network pressure discrepancy report, with corrections made as necessary.

Meter numbers

TOU meters will be identified by the site ID corresponding to their corrector, which will be used to ensure that readings are recorded against the correct meter. There are no comparisons between SAP and the registry to identify meter serial number differences. Contact will rely on ADR and Bluecurrent communicating any site ID mismatches.

Meter digits

If the TOU meter is set to Y on the registry, the meter register digits field is ignored.

Meter operating at network pressure

If the TOU meter is set to Y on the registry, the meter operating at network pressure field is ignored.

Meter pressure

If the TOU meter is set to Y on the registry, the meter register pressure field is ignored.

There will be no changes to meter pressure validation for non TOU ICPs. Current values for meter pressure are validated against the registry monthly using the gas ICP meter pressure discrepancy report, with corrections made as necessary. The report identifies ICPs where the serial number recorded in SAP and the registry are the same, but the pressure is different, as well as ICPs where the meter serial numbers and pressures are different. Meter pressure is corrected for the meter instance. If an existing meter undergoes a pressure change, it is necessary to treat it as a meter replacement on the date of the pressure change so that the correct pressure can be applied.

I reviewed the report generated on 28 August 2025 and found there were ten discrepancies where the meter number and meter pressure did not match, indicating a timing difference where a meter change has occurred.

Meter multiplier

If the TOU meter is set to Y on the registry, the meter register multiplier field is ignored.

Current data discrepancies

It would be helpful to clear any backlogs of discrepancies in fields used by TOU and non-TOU ICPs, so that any new issues relating to TOU ICPs can be easily identified.

Field	Discrepancy
Allocation group	I reviewed the allocation group reports for August 2025 and found there were some non-TOU exceptions which require resolution: • ICP 0006000480NGE07 in AG4 which is expected to use over 250 GJ p.a. but has a bi-monthly meter reading route, and • 115 ICPs in AG6 which are expected to use over 250 GJ p.a. and are expected to be in AG4; 46 of those are read bi-monthly and one ICP does not have a reading route assigned.
Network and gas gate	I reviewed the report generated on 26 August 2025 and found the following discrepancies: • one permanently disconnected ICP with an incorrect network code, and • 30 ICPs with a gas gate discrepancy, where the gate assigned on the registry and in SAP were part of the same gas gate group or notional delivery point.

Field	Discrepancy
ICP altitude	I reviewed the report generated on 26 August 2025 and found there were 378 discrepancies for active ICPs where the SAP and registry altitudes are different. I confirmed that the altitude discrepancies identified during the previous audit have been resolved. Where differences occur bulk updates to SAP are made effective from the day after the last read date. If there is an open meter read order or an estimated read, an exception is created and the updates for affected ICPs are reprocessed once actual reads are available. This can take three to four months after the first attempt, because reads are scheduled every second month.
Network pressure	I reviewed the report generated on 4 September 2025 and found there were 34 network pressure discrepancies between the registry and SAP. 31 were for active ICPs and three were for disconnected ICPs. Where differences occur bulk updates to SAP are made effective from the day after the last read date. If there is an open meter read order or an estimated read, an exception is created and the updates for affected ICPs are reprocessed once actual reads are available. This can take three to four months after the first attempt, because reads are scheduled every second month.

Conclusion

Future compliance is not expected to be affected by supply of TOU ICPs, but it would be helpful to resolve existing discrepancies so that any new discrepancies relating to TOU ICPs can be promptly identified, expand the allocation group checks and complete a periodic reconciliation to ensure that Contact and Bluecurrent's records are consistent. The attributes where no validation is completed are ignored for TOU ICPs.

Recommendation	Audited party comment
Expand the monthly allocation group review to identify AG4 and AG6 ICPs with actual or estimated consumption over 10,000 GJ p.a. so that TOU metering can be installed and the ICP moved to AG1 if the TOU meter has telemetry, or AG2 if the TOU meter does not have telemetry. Based on the number of exceptions identified on the August 2025 reports there appears to be a backlog in moving ICPs to the correct allocation groups and routes. Contact should ensure that identification of any ICPs which require upgrade to TOU, or TOU ICPs in incorrect allocation groups are prioritised, and the backlog is cleared.	A new report will be built for this purpose during Q2 (Oct-Dec 25). The Operations Contractor Lead will monitor this report and will initiate metering upgrades and/or registry updates as required to clear the backlog and respond to any new mismatches.
Ensure that existing ICP static data discrepancies between SAP and the registry are resolved if possible, including: • networks and gas gates even if the gates are part of the same notional delivery point,	The Registry Analyst will use existing reports to identify and resolve these discrepancies. Additionally, new energy reconciliation exception management reports will be built during Q2 (Oct-

Recommendation	Audited party comment
• altitudes, • network pressures, and • meter pressures. This will allow any new TOU discrepancies to be easily identified and resolved.	Dec 2025) to ensure TOU discrepancies have been successfully resolved.
Consider a regular reconciliation between Bluecurrent's ICP, meter and corrector records and Contact's records to ensure details are complete and accurate.	Contact will work with Bluecurrent during Q2 (Oct-Dec 2025) to establish a suitable reconciliation process.

9. Switching

Non-TOU and TOU ICPs follow the same switching process. The only difference between TOU and non-TOU switches is that TOU meters have a meter and datalogger (or corrector) installed. Under the Gas (Switching Arrangements) Rules 2008 definitions, the datalogger (or corrector) forms part of the TOU meter:

> **TOU meter** means a meter which has an associated datalogger to allow register readings or gas consumption to be recorded automatically at pre-determined intervals;

GTN and GNC files require a meter, register and content code information. For non-TOU meters there is one meter register and the content is uncorrected (U). For TOU ICPs, there is an uncorrected meter register (U) and a corrected datalogger or corrector register, which will be corrected for temperature (T); temperature and absolute pressure (TA); temperature and gauge pressure; or temperature (TG), gauge pressure and supercompressibility (TGS). Readings for both are expected to be provided in GTN and GNC files, but if the datalogger only records daily or hourly volumes not readings, then a zero reading can be provided.

The register content code and datalogger or corrector details are not held on the registry for TOU ICPs, which prevents the registry from thoroughly validating GTN and GNC file content for TOU ICPs. I have found that retailer file content can be inconsistent for TOU ICPs, with retailers sometimes providing only the corrected or uncorrected register, and sometimes both as two registers under the meter. It is important to ensure that both values are provided, so that they can be validated against readings received after switch in by the gaining retailer to determine whether they are correct and a read renegotiation is required.

Move outs

Processes for customers to move out of a premises without the ICP switching out have been successfully tested, including updating the ANZSIC code if necessary to reflect the customer change.

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

There will be no changes to the existing processes for SAP to issue GNT files, or monitor and resolve BPEMs (Business Process Exception Management items) generated where SAP cannot automatically create GNT files.

Customer application details will be manually loaded into UTIL-Sales, which will create the customer account and ICP in SAP. Once the required fields are populated in SAP including the ICP, ANZSIC code if different to what is recorded on the registry, contract start date and switch type, SAP will create a process document (pdoc) to change the supplier to a new retailer, which generates the GNT and transfer it to the registry. The losing retailer has requested that contact apply the move switch type with a requested date of 1 October 2025, to ensure that all switches are processed by their system effective 1 October 2025.

SAP receives incoming registry acknowledgement files for GNTs and a BPEM is created if the acknowledgement contains an error or is not received within the expected timeframe. If necessary SAP allows the user to reprocess the current step so that the file can be reissued.

The incoming GAN and GTN files are monitored to ensure the switches are successfully completed effective from 1 October 2025. A BPEM is produced if an incoming GAN is not received within the expected timeframe. On issuing a GNT for a TOU ICP, SAP will create a CG39 BPEM on switch completion to remind the field connections team to manually install TOU metering. On completion of the switch a notification file is imported into SAP containing all the ICP attributes. The processes to receive incoming GAN and GTN files will ensure that the “no MR” flag is activated to indicate that ongoing register reads will not be loaded unless supplied for switch loss.

As discussed in **section 7**, Bluecurrent will be advised of ICPs that require set up in their system prior to switch in.

Switch gain processes have been successfully tested. 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 supply of TOU ICPs.

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

Contact does not expect to receive any incoming GNTs in the short term because all ICPs will have a fixed contract term.

Within two business days of receiving a gas switching notice (GNT), 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). Contact will continue to monitor BPEMs and the switch breach history report to identify switch files which are due, to ensure the files are created either from SAP or via the registry user interface depending on the type of file needed.

Switch loss processes have been successfully tested. 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 supply of TOU ICPs.

9.3 Gas Acceptance Notice (Rule 70)

Contact does not expect to receive any incoming GNTs in the short term because all ICPs will have a fixed contract term.

There will be no changes to the existing processes for SAP to issue GAN files, or monitor and resolve BPEMs (Business Process Exception Management items) generated where SAP cannot automatically

create GNT files. The switching team will continue to run the switch breach history report on the registry twice daily to identify any ICPs where switching files are expected but have not been issued. They work through the list and check any affected ICPs and either update SAP so that the file can be issued or create the file manually on the registry. The process has been successfully tested for TOU ICPs.

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 supply of TOU ICPs.

9.4 Gas Transfer Notice (Rule 72)

Contact does not expect to receive any incoming GNTs in the short term because all ICPs will have a fixed contract term. Contact will manually create TOU GTN files via the registry user interface, and will ensure that the content is consistent with the Rules and the Registry Detailed Requirements Specification.

On receipt of an incoming GTN, SAP will automatically create a GAN. Following that, SAP will attempt to create a GTN, but because all TOU ICPs are created with the MR flag set to No, the process will be halted and a CL21 BPEM will be created because no meter readings are available. The switching team will consult with the ICP's account manager to determine whether the ICP should be switched out, and will process the switch manually via the registry user interface if necessary. The GTN content will be determined from actual or estimated readings provided by Bluecurrent, and historic consumption data will be used to determine the annualised consumption estimate.

The switching process has been successfully tested up to the point of SAP creating a CL21 BPEM, and Contact is able to successfully create manual GTN files via the registry user interface.

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 supply of TOU ICPs.

9.5 Accuracy of Switch Readings (Rule 74)

Outgoing GTN

GTN files are generated by SAP and switch event readings are determined from the readings held within SAP. If a suitable reading is not available for the switch and an estimate cannot be generated a BPEM is created. A user will ensure that a validated or estimated switch event reading is entered, and then the GTN will be generated from SAP.

If an ICP switches out, the GTN will be manually created on the registry using corrected and uncorrected readings supplied by Bluecurrent which are consistent with submission data they provide. This will ensure that the content is consistent with the Rules and the Registry Detailed Requirements Specification.

Outgoing GNC

Contact will receive corrected and uncorrected register readings from Bluecurrent for AG1 ICPs and ADR for AG2 ICPs. They intend to validate the incoming readings in October 2025 against the incoming GTN readings, to identify any ICPs which require read renegotiations.

Outgoing GNC files will be initiated from SAP, which is configured to generate files with more than one meter register. BPEMs will be generated for accepted and rejected AC files returned by other retailers. They will be processed by the billing team who update the readings in SAP and reverse and rebill the customer as needed, and the change will be communicated to Bluecurrent.

The processes have not specifically been tested for gas.

Outgoing GAC

Incoming GNC files will be loaded into SAP and create a BPEM, prompting the user to check and accept or reject the request in SAP, which automatically creates the outgoing GAC. SAP will be manually updated with the correct readings as needed, and the change will be communicated to Bluecurrent.

The processes have not specifically been tested for gas.

Conclusion

Timeliness of switching files will be checked in the first audit after the changes go live. As TOU ICPs should receive regular actual readings it is likely that switches will be completed on actual readings and read renegotiations will not be required. Future compliance is not expected to be affected by the material change, provided that any instances are advised to Bluecurrent where the agreed switch event reading changes or is inconsistent with meter reading data, and the read change processes are successfully tested. Contact is able to generate GNC and GAC files directly on the registry in the event that SAP is unable to generate the file.

Recommendation	Audited party comment
Ensure that any instances where the agreed switch event reading changes or is inconsistent with meter reading data are advised to Bluecurrent.	Contact will establish a process to achieve this outcome, including obtaining register meter readings when required, during October 2025. The Switching team will be responsible for this process.
Test processes to issue GNC and GAC files.	Contact will establish a process to achieve this outcome, including obtaining register meter readings when required, during October 2025. The Switching team will be responsible for this process.

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

GNW

There will be no changes to the existing processes for SAP to identify ICPs requiring switch withdrawals, issue GNW files, or monitor and action incoming GAW responses. The processes have been successfully tested for TOU ICPs.

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 supply of TOU ICPs.

GAW

Incoming TOU NWs will be identified using a WD14 BPEM. There will be no changes to the existing processes for SAP to issue GAW files, or monitor and resolve BPEMs (Business Process Exception Management items) generated where SAP cannot automatically create GAW files. The switching team will continue to run the switch breach history report on the registry twice daily to identify any ICPs where switching files are expected but have not been issued. They work through the list and check any TOU ICPs with the account manager, and either update SAP so that the file can be issued or create the file manually on the registry.

Conclusion

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 supply of TOU ICPs.

9.7 Switch Reading Negotiation (Rule 79, 81)

Outgoing GNC and incoming GAC

Contact will receive corrected and uncorrected register readings from Bluecurrent for AG1 ICPs and ADR for AG2 ICPs. They intend to validate the incoming readings in October 2025 against the incoming GTN readings, to identify any ICPs which require read renegotiations.

Where read renegotiation is needed a service order is raised, which remains open until the process is complete. The GNC is generated from SAP using readings chosen by the user, the read type is only entered as actual if Contact has received an actual validated reading for the event date, such as contactor reconnection read. Otherwise, the read type is recorded as estimated.

GAC responses to GNCs issued by Contact are imported into SAP and create a task. A user manually updates the readings in SAP to reflect the outcome of the RR process, and if they are not satisfied with the outcome will undertake further negotiation with the other retailer and issue another GNC. Once the process is complete the service order associated with the renegotiation will be closed, and the change will be communicated to Bluecurrent.

The processes have not specifically been tested for gas.

Incoming GNC and outgoing GAC

Contact does not expect to receive any incoming GNTs in the short term because all ICPs will have a fixed contract term. Incoming GNC files will be loaded into SAP and create a BPEM, prompting the user to check and accept or reject the request in SAP, which automatically creates the outgoing GAC. SAP will be manually updated with the correct readings as needed, and the change will be communicated to Bluecurrent. GAC files due will also be identified using the switch breach history report.

The processes have not specifically been tested for gas.

Conclusion

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 supply of TOU ICPs, provided that the recommendations in **section 9.5** are adopted.

10. Bypass of Distributor (Rule 82)

Contact 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 ten recommendations:

Report section	Recommendation
7	Confirm the process to identify changes to TOU ICP static data, and confirm how these changes will be communicated to Bluecurrent promptly.
7	Confirm the process to identify changes to TOU meter or corrector data, and confirm how these changes will be communicated to Bluecurrent promptly.
7	Confirm the process to identify TOU meter outages or faults and communicate them to Bluecurrent promptly.
7	Test meter and corrector change processes, including ensuring that they correctly flow through to submission data.
7	Collect the corrected register content code and multiplier (if greater than one) information from the meter owner and provide it to Bluecurrent in an agreed format.
8	Expand the monthly allocation group review to identify AG4 and AG6 ICPs with actual or estimated consumption over 10,000 GJ p.a. so that TOU metering can be installed and the ICP moved to AG1 if the TOU meter has telemetry, or AG2 if the TOU meter does not have telemetry. Based on the number of exceptions identified on the August 2025 reports there appears to be a backlog in moving ICPs to the correct allocation groups and routes. Contact should ensure that identification of any ICPs which require upgrade to TOU, or TOU ICPs in incorrect allocation groups are prioritised, and the backlog is cleared.
8	Ensure that existing ICP static data discrepancies between SAP and the registry are resolved if possible, including: Networks and gas gates even if the gates are part of the same notional delivery point. Altitudes. Network pressures. Meter pressures. This will allow any new TOU discrepancies to be easily identified and resolved.
8	Consider a regular reconciliation between Bluecurrent's ICP, meter and corrector records and Contact's records to ensure details are complete and accurate.
9.5	Ensure that any instances where the agreed switch event reading changes or is inconsistent with meter reading data is advised to Bluecurrent.
9.5	Test processes to issue GNC and GAC files.

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 – Contact Comments

Contact appreciates the constructive and helpful engagement from Provera and GIC as we prepare to switch in and supply 63 allocation group 1 and 2 TOU ICPs from 1 October 2025.

We are confident we have implemented robust systems and processes to supply these gas TOU ICPs in a manner compliant with the rules. We acknowledge the areas for improvement or completion and will promptly implement Provera's ten recommendations to further strengthen our control environment.

Thank you again for your kind assistance.

Phil Hawkey

Strategic Metering & Commercial Manager