Gas Registry and Switching Performance Audit Final Report

For

Genesis Energy Limited and Frank Energy

Prepared by

Bernie Cross: Crosshaven Consulting

Date of Audit: 20-23 November 2023

Date Audit Report Complete: 25 May 2024

Under the Gas (Switching Arrangements) Rules 2008 the Gas Industry Company commissioned Crosshaven Consulting to undertake a performance audit of Genesis Energy and Frank Energy. The purpose of the audit is to assess compliance with the rules and the systems and processes put in place to enable compliance.

Executive Summary

This Performance Audit was conducted at the request of the Gas Industry Company (GIC) in accordance with Rule 88 of the Gas (Switching Arrangements) Rules 2008 in effect from 14 September 2015.

The purpose of this audit is to assess the systems, processes and performance of three participants codes: Genesis Energy (GENG and GEND) and Frank Energy (GEOL).

The audit was conducted within the terms of reference supplied by the GIC and within the guideline note Guideline note for rules 65 to 75: the commissioning and carrying out of performance audits and event audits, version 3.0 (http://www.gasindustry.co.nz/dmsdocument/2858).

This three year audit period has been challenging for Genesis Energy and Frank Energy as well as the industry in general due to the Covid 19 pandemic and also extreme weather events impacting work practices & resourcing, meter read attainment, and customers consumption patterns.

These challenges are evident in the levels of data accuracy and timeliness measured across the audit period with more exceptions identified for earlier periods and more recent improvements to data accuracy and timeliness as process improvements have been implemented and additional resourcing allocated to tasks.

Genesis Energy and Frank Energy continue to have a culture where compliance is an integral part of how they do business, and there is a strong focus on ensuring that information updates are timely and accurate.

The summary of report findings in the table below shows that Genesis Energy's and Frank Energy's control environment is 'effective' for eight of the areas, 'acceptable' for three areas and 'needs improvement for three areas evaluated.

Six of the 14 areas evaluated were found to be compliant. Nine breach allegations are made in relation to:

- Late registry updates.
- Delays updating new connections.
- Delays in identifying and resolving data discrepancies.
- Incorrect switching file content.

Nine recommendations were made to improve future compliance, mostly focussed on monitoring, validation and improved timeliness of registry updates. The recommendations are listed in **section 11**, and the relevant report sections.

Summary of report findings

Issue	Section	Control Rating (Refer to Appendix 1 for definitions)	Compliance Rating	Comments
Participant registration information	2	Effective	Compliant	The contact number and email address are current and valid.
Obligation to act reasonably	3	Effective	Compliant	No examples of Genesis Energy or Frank Energy acting unreasonably were found.
Obligation to use registry software competently	4	Effective	Compliant	No examples of Genesis Energy or Frank Energy using registry software incompetently were found.
ICP identifier on invoice	5	Effective	Compliant	An example of an invoice was viewed for a Genesis Energy non TOU, Genesis TOU and Frank Energy non TOU customer. All were found to show the ICP
Uplift of READY ICP	6	Needs improvement	Not compliant	Registry not populated within two business days of Genesis Energy entering into a contract to supply gas to a consumer for 44 ICPs from a sample of 50 new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. Registry not populated within two business days of Frank Energy entering into a contract to supply gas to a consumer for a sample of 17 new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. Two ICPs (1002079115QT7D1, 1002148326QT20E) identified on the RSREADY report with Registry meter event records remain unclaimed by Frank Energy. Two recommendations made to improve process effectiveness. • Once a new connection has been confirmed as cancelled, follow up with the distributor to ensure the ICP is decommissioned on the

				registry so that the RSREADY report is an accurate representation of all current new connection ICPs. • Continue to actively monitor the registry 'RSREADY' report and match the ICPs listed against received customer supply applications to ensure all proposed new connections are accounted for
Maintenance of ICP information in registry	7	Needs improvement	Not compliant	Genesis Energy - For ICP 0004228390NGACF the TOU flag was set to N however the profile code was set to XTOU and the allocation group was 2. Genesis Energy - ICP status was not updated on the registry as soon as practicable for 64 of the 91 late updates checked. Genesis Energy - Four active ICPs with telemetry are incorrectly assigned allocation group 2. Frank Energy - ICP status was not updated on the registry as soon as practicable for four of the eight late updates checked. One recommendation made to improve process effectiveness. • Review the new connection process of back dating the initial retail event to align with the ICP creation date to ensure the ICP is claimed from the date Genesis has entered into an agreement with a customer for the ICP.
Resolving discrepancies	8	Needs improvement	Not compliant	Genesis Energy and Frank Energy did not consistently use best endeavours to identify and resolve discrepancies, and some discrepancies have been present for extended periods. **ICP status and connection status** 5 ICPs from a sample of ten have incorrect inactive status recorded on the registry. **Allocation groups** A review the meter read frequency of ten ICPs recently updated to allocation group 4 was undertaken and found that for six ICPs meter readings have not been obtained monthly since 1 August 2023.

				Nine allocation group 4 ICPs with annualised consumption below 250 GJ were identified that were not included in the Genesis Energy allocation group exception reporting. Four recommendations made to improve process effectiveness. • Ensure all ex EGAS ICPS that have not been decommissioned are set up in Gentrack to enable monitoring of registry information. • Ensure allocation group exception report is run and reviewed on a regular cycle. • Review process to update the allocation group value for an ICP to ensure that the meter reading frequency requirements have been confirmed as being updated by the meter reading agent prior to updating the allocation group on the registry. • Review allocation group exception report selection criteria to identify why some ICPs appear to be missing from this report.
Initiation of consumer switch/switching notice	9.1	Acceptable	Not Compliant	Genesis Energy - Five of a sample of 42 GNTs were not issued within two business days of entering into a contract to supply gas. Genesis Energy - A NTD breach was recorded for non TOU ICP 0004224678NGCE4, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch. Genesis Energy - Two NTD breaches were recorded for TOU ICP 0001028461NG515, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch. Genesis Energy - One GNT (ICP 0000509601QT523) was confirmed as being sent with the incorrect switch type. Genesis Energy - Two GNT's (ICPs 0002289861QTB84 and 1000592961PGB09 were confirmed as being sent with incorrect requested switch dates. Frank Energy - Two of a sample of 28 GNTs were not issued within two business days of entering into a contract to supply gas.

				Frank Energy - One GNT file (ICP 0000284341QT28D) was confirmed that the incorrect switch type was selected by Frank Energy. Frank Energy - Four GNT files (0000242291QT7BB, 0000495741QT6AA, 0000696991QT7DB, 0001290220PGA5A) were confirmed as being sent with incorrect requested switch dates
Response to a gas switching notice	9.2	Effective	Not Compliant	The switch breach report identified two Genesis Energy TOU ICPs (0003067547NGF4C – one day overdue, 1000540573PG23C – three days overdue) where a GAN file was sent late
Gas acceptance notice	9.3	Acceptable	Not Compliant	Genesis Energy - Two ICPs (1000502714PG2D4, 1000606216PGD60) had an acceptance code of PD – Premise Disconnected applied when the ICP was active due to a data accuracy issue in Gentrack. Frank Energy - Four ICPs (1002124101QT14E, 1001149255QT8FC, 0002020771QTCB6, 0002287011QT614) had an acceptance code of OC – Occupied due to the dummy account “the New Occupier’ being set up to ensure any meter readings received for the ICP was correctly validated and used in the submission process. However, these ICPs were vacant. Frank Energy - One ICP (0000282971QTABF) had an acceptance code of MU - No Meter in place when there was a meter present on site and recorded on the gas registry. Two recommendations made to improve process effectiveness. Increase frequency of monitoring status values between Gentrack and the registry to ensure continual alignment to ensure GAN response codes are accurate. Increase frequency of monitoring status values between Gentrack and the registry to ensure continual alignment to ensure GAN response codes are accurate.

Gas transfer notice	9.4	Acceptable	Not Compliant	Genesis Energy - Three ICPs (0000236516QTC00, 0000011895GN949, 0000545571QT368) had incorrect date of last read dates applied where the date of the move out estimate read was applied as the last actual read date. Genesis Energy - The switch breach detail report identified one breach (NTD) relating to ICP 0004224678NGCE4 where the switch date (28 June 2023) did not reflect the expected switch date provided by GENG in the gas acceptance notice (23 June 2023). Genesis Energy - Two ICPs (0004228390NGACF, 0003067547NGF4C had incorrect date of last read dates that recorded the switch transfer date as the last read date rather than the last day of supply. Frank Energy - The switch breach detail report identified one breach (TND) relating to ICP 1001285241NG619 where the switch date (11 June 2023) was prior to the proposed switch date provided by the gaining retailer in the gas switching notice (12 June 2023).
Accuracy of switch readings	9.5	Effective	Compliant	
Gas switching withdrawal	9.6	Effective	Not Compliant	Genesis Energy - For three GNW files an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied. Frank Energy - For nine GNW files an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied. Frank Energy - For two GNW files an incorrect request code of WP – Wrong Property was applied where a customer had requested to cancel the switch and a correct reason request code of CR – Customer Request should have been applied. One recommendation made to improve process effectiveness.

				• Review the 3rd party and online sign up processes to improve the accuracy of the information provided by customers to enable accurate switch types to be determined
Switch reading negotiation	9.7	Effective	Compliant	

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1. Pre-Audit and Operational Infrastructure Information

1.1. Scope of Audit

This Performance Audit was conducted at the request of the GIC in accordance with Rule 88 of the Gas (Switching Arrangements) Rules 2008 in effect from 14 September 2015.

88. Industry body to commission performance audits

88.1 The industry body must arrange performance audits of registry participants at intervals of no greater than five years.

88.2 The purpose of a performance audit under this rule is to assess in relation to the roles performed by a registry participant -

88.2.1 The performance of the registry participant in terms of compliance with these rules; and

88.2.2 The systems and processes of that registry participant that have been put in place to enable compliance with these rules.

The audit was conducted in accordance with terms of reference prepared by GIC.

The audit was carried out in Hamilton between 20th November and 22nd November 2023.

The scope of the audit includes compliance with the "switching arrangements" rules only. There is a separate report for downstream reconciliation.

1.2. Audit Approach

As mentioned in **section 1.1** the purpose of this audit is to assess the performance of Genesis Energy and Frank Energy 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 of Genesis Energy and Frank Energy 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.[1]

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.

1.3. General Compliance

For both Genesis Energy and Frank Energy non TOU ICPs, the status and trader updates are processed within the Gentrack system which then automatically updates the gas registry. Genesis Energy TOU

[1] in statistics, the determination that a result or an observation from a set of data is due to intrinsic qualities and not random variance of a sample. Statistical significance does not imply the size, importance, or practicality of an outcome; it simply indicates that the outcome's difference from a baseline is not due to chance. (Encyclopaedia Britannica)

ICPs are managed separately, mainly outside of Gentrack and status and trader updates are processed manually using the registry web interface.

Genesis Energy and Frank Energy continue to have a culture where compliance is an integral part of how they do business, and there is a strong focus on ensuring that information updates are timely and accurate.

1.3.1. Summary of Previous Audit

The previous audits were conducted in 2020 by Langford Consulting. The table below shows the findings of these audits and whether the issues have been resolved.

Breach Allegation	Rule	Section in this report	Status
Breach notice 2021-039 GENG GEOL and GEND initiate switches without a current use of system agreement with the relevant distribution system owner.	65.2.3	9.1	The Market Administrator did not raise any material issues in relation to the breach.
Breach notice 2021-040 GENG was late entering registry values for 34 new ICPs out of a sample of 64 ICPs drawn from the maintenance breach history report. GEOL was late entering registry values for 11 new ICPs out of a sample of 31 ICPs drawn from the maintenance breach history report.	54.1	6	The Market Administrator did not raise any material issues in relation to the breach. Further non-conformance was found during this audit
Breach notice 2021-041 GENG initiated a switch more than 2 business days after entering into a gas sales contract for a contract that did not have a commencement date more than 12 business days ahead, for 9 ICPs out of a sample of 41. GEOL initiated a switch more than 2 business days after entering into a gas sales contract for a contract that did not have a commencement date more than 12 business days ahead, for 2 ICPs out of a sample of 23.	66.1	9.1	The Market Administrator did not raise any material issues in relation to the breach. Further non-conformance was found during this audit
Breach notice 2021-042 GEND did not comply with the requirement to respond to a gas switching notice within 2 business days for 2 ICPs	69.1	9.3	The Market Administrator did not raise any material issues in relation to the breach.

Breach Allegation	Rule	Section in this report	Status
Breach notice 2021-043 A sample of GEND GTNs (transfer notices) found 3 ICPs with the wrong number of dials. The number of dials appeared to be a systematic problem with the GEND process	72.1.3, 72.1.8	9.4	The Market Administrator did not raise any material issues in relation to the breach.

1.3.2. Breach Allegations

The table below shows the breaches recorded by the Market Administrator for the audit period.

Participant code	Notifying participant	Breach No	Breach month	Underlying breaches	Rule allegedly breached	Outcome
GEND	Jade	2023-002	Feb-23	2	67.3	Awaiting decision by Market Administrator
GEND	Jade	2023-003	Mar-23	1	69.2	Awaiting decision by Market Administrator
GEND	Jade	2021-004	Feb-21	1	67.3	Closed – not material
GEND	Jade	2021-052	Jul-21	12	69.1	Closed – not material
GEND	Contact Energy Limited	2021-066	Aug-21	5	34.1, 72.1.5, 72.2, 74.1, 81.3	Closed – not material
GEND	Jade	2022-001	Jan-22	15	69.1, 69.2	Closed – not material
GEND	Jade	2022-013	Mar-22	1	81.1	Closed – not material
GEND	Jade	2022-032	Aug-22	2	69.1	Closed – not material
GENG	Jade	2020-021	Nov-20	1	72.2	Closed – not material
GENG	Jade	2020-065	Dec-20	3	70.2 & 72.2	Closed – not material
GENG	Jade	2021-053	Jul-21	2	70.2 & 72.2	Closed – not material
GEOL	Gas Industry Co	2020-022	Nov-20	1	62.1	Closed – not material

Non-compliance was found in eight sections of this audit. Nine breach allegations are made in relation to these matters.

Breach Allegation	Rule	Section in this report
Genesis Energy - GENG Registry not populated within two business days of Genesis Energy entering into a contract to supply gas to a consumer for 44 ICPs from a sample of 50 new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. **Frank Energy - GEOL** Registry not populated within two business days of Frank Energy entering into a contract to supply gas to a consumer for a sample of 17 new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. Two ICPs (1002079115QT7D1, 1002148326QT20E) identified on the RSREADY report with Registry meter event records remain unclaimed by Frank Energy.	54.1	6
Genesis Energy - GENG For ICP 0004228390NGACF the TOU flag was set to N however the profile code was set to XTOU, and the allocation group was 2. ICP status was not updated on the registry as soon as practicable for 64 of the 91 late updates checked. **Genesis Energy - GEND** Four active ICPs with telemetry are incorrectly assigned allocation group 2. ICP status was not updated on the registry as soon as practicable for four of the eight late updates checked. **Frank Energy - GEOL** ICP status was not updated on the registry as soon as practicable for 22 of the 45 late updates checked.	58.1, 61.1	7
Genesis Energy - GENG Genesis Energy did not consistently use best endeavours to identify and resolve discrepancies. **ICP status and connection status** 5 ICPs from a sample of ten have incorrect inactive status recorded on the registry. **Allocation groups** A review the meter read frequency of ten ICPs recently updated to allocation group 4 was undertaken and found that for six ICPs meter readings have not been obtained monthly since 1 August 2023. Nine allocation group 4 ICPs with annualised consumption below 250 GJ were identified that were not included in the Genesis Energy allocation group exception reporting. **Frank Energy - GEOL** Frank Energy did not consistently use best endeavours to identify and resolve discrepancies.	62.1	8

Breach Allegation	Rule	Section in this report
ICP status and connection status 12 ICPs from a sample of 13 where the ICP connection status code was incorrect as the code incorrectly reflected that a meter was present however the metering event and Gentrack information confirmed that the meter had been removed.		
Genesis Energy - GENG Five of a sample of 42 GNTs were not issued within two business days of entering into a contract to supply gas. A NTD breach was recorded for non TOU ICP 0004224678NGCE4, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch. Two NTD breaches were recorded for TOU ICP 0001028461NG515, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch. One GNT (ICP 0000509601QT523) was confirmed as being sent with the incorrect switch type. Two GNT's (ICPs 0002289861QTB84 and 1000592961PGB09 were confirmed as being sent with incorrect requested switch dates. **Frank Energy - GEOL** Two of a sample of 28 GNTs were not issued within two business days of entering into a contract to supply gas. One GNT file (ICP 0000284341QT28D) was confirmed that the incorrect switch type was selected by Frank Energy. Four GNT files (0000242291QT7BB, 0000495741QT6AA, 0000696991QT7DB, 0001290220PGA5A) were confirmed as being sent with incorrect requested switch dates.	66.1, 67.1.2, 67.3	9.1
Genesis Energy - GEND The switch breach report identified two GEND ICPs (0003067547NGF4C – one day overdue, 1000540573PG23C – three days overdue) where a GAN file was sent late.	69.2	9.2
Genesis Energy - GENG Two ICPs (1000502714PG2D4, 1000606216PGD60) had an acceptance code of PD – Premise Disconnected applied when the ICP was active due to a data accuracy issue in Gentrack. **Frank Energy - GEOL** Four ICPs (1002124101QT14E, 1001149255QT8FC, 0002020771QTCB6, 0002287011QT614) had an acceptance code of OC – Occupied due to the dummy account "the New Occupier' being set up to ensure any meter readings received for the ICP was correctly validated and used in the submission process. However, these ICPs were vacant.	70.3	9.3

Breach Allegation	Rule	Section in this report
One ICP (0000282971QTABF) had an acceptance code of MU - No Meter in place when there was a meter present on site and recorded on the gas registry.		
Genesis Energy - GENG Three ICPs (0000236516QTC00, 0000011895GN949, 0000545571QT368) had incorrect date of last read dates applied where the date of the move out estimate read was applied as the last actual read date. The switch breach detail report identified one breach (NTD) relating to ICP 0004224678NGCE4 where the switch date (28/6/2023) did not reflect the expected switch date provided by GENG in the gas acceptance notice (23/6/2023). Two ICPs (0004228390NGACF, 0003067547NGF4C had incorrect date of last read dates that recorded the switch transfer date as the last read date rather than the last day of supply.	72.1.5	9.4
Frank Energy - GEOL The switch breach detail report identified one breach (TND) relating to ICP 1001285241NG619 where the switch date (11/6/2023) was prior to the proposed switch date provided by the gaining retailer in the gas switching notice (12/6/2023).	72.2	9.4
Genesis Energy - GENG For three GNW files an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied **Frank Energy - GEOL** For nine GNW files an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied. For two GNW files an incorrect request code of WP – Wrong Property was applied where a customer had requested to cancel the switch and a correct reason request code of CR – Customer Request should have been applied.	76.2	9.6

1.4. Provision of Information to the Auditor (Rule 91)

In conducting this audit, the auditor may request any information from Genesis, the industry body, and any registry participant.

Information was provided by Genesis in a timely manner 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	Included in report
Genesis Energy	Comments on the draft audit report	23 May 2024 by email	Genesis Energy's comments have been added to the remedial action and audited party comment sections of the non compliance and recommendation boxes within this report. In addition to the comments in the boxes minor formatting changes were made to consolidate the non compliances into one alleged breach per section as these functions were performed by a single team for each participant code.

2. Participant registration information (rules 7 and 10)

All registry participants must supply registration information to the registry operator. Registration information consists of:

- the name of the registry participant,
- the registry participant's telephone number, physical address, facsimile number, email address, and postal address, and
- identification as to which class, or classes, of registry participant (retailer, distributor or meter owner) that the registry participant belongs.

Registration information must be given in the form and manner required by the registry operator as approved by the industry body. Every person who is a registry participant at the commencement date must supply the registration information within 20 business days of the commencement date. Every person who becomes a registry participant after the commencement date must supply the registration information within 20 business days of becoming a registry participant.

GENESIS ENERGY (GENG, GEND)

The participant registration information for Genesis Energy was reviewed. There is only one contact number and email address populated for each of the participant codes GENG and GEND. The contact number is a valid Genesis Energy number however the team member associated with this number is not involved in the registry or switching functions.

Frank Energy (GEOL)

The participant registration information for Frank Energy was reviewed. There is only one contact number and email address populated the participant code GEOL. The contact number is a valid Genesis Energy number however the team member associated with this number is not involved in the registry or switching functions.

3. Obligation to act reasonably (rule 34)

No examples of Genesis Energy or Frank Energy acting unreasonably were found.

4. Obligation to use registry software competently (rule 35)

No examples of Genesis Energy or Frank Energy using registry software incompetently were found.

5. ICP identifier on invoice (rule 36)

An example of an invoice was viewed for a Genesis Energy non TOU, Genesis TOU and Frank Energy non TOU customer. All invoices were found to show the ICP.

6. Uplift of READY ICP (rule 54)

The process for the connection and activation of new ICPs was examined.

To comply with rule 54, it is necessary for a retailer, once the ICP status is changed to READY by the distributor, to enter registry ICP parameters, including ICP status and valid connection status, within 2 business days of entering a contract to supply with the consumer.

GENESIS ENERGY non TOU (GENG)

The first point of contact for non TOU new connections is the customer or distributor as a READY ICP. The ICP is set up in Gentrack and claimed on the registry as soon as Genesis Energy detects a new ICP with GENG as the proposed retailer using the RSREADY registry report. The customer is contacted and signed up alongside the network application being approved in the respective distributor's portals.

A job is then raised in Siebel for the meter installation, where this is not also managed by the distributor livening process, and the process is then passed back to the network and meter installer. Details are entered in a new connections pending spreadsheet. When paperwork is received from the meter owner to say that the meter is now installed, the meter is then set up in Gentrack and the customer moved from being a future consumer to a current consumer. Gentrack in turn updates the registry status to active automatically.

Genesis Energy operates on a 30 day internal SLA for gas new connections. All outstanding proposed new connections are followed up after this period with both the customer and the distributor to provide updates regarding an expected livening ETA. Where a revised livening date is not able to be provided the field service request in Seibel is cancelled and another Siebel field service request is raised once the customer or distributor is able to provide a new proposed livening date. If the customer decides not to process with the new connection, then the Siebel field service request is cancelled and the ICP is requested to be decommissioned.

To comply with rule 54, it is necessary for a retailer, once the ICP status is changed to READY by the distributor, to enter registry ICP parameters, including ICP status and valid connection status, within two business days of entering a contract to supply with the consumer.

The Maintenance Breach History Report (RET breaches) was examined for input dates between 1 August 2022 and 31 July 2023. This report contained 2,481 ICPs (92.3%) where the initial registry update was later than two business days out of a total of 2,679 new connections with an average number of days to populate the registry of 20.4 days. The records for 50 ICPs were reviewed where the registry update was more than ten business days late and found:

- Six of the 50 ICPs reviewed were where the proposed retailer had not initially been GENG indicating that the initial new connection request was with another retailer.
- For 44 ICPs listed below, there were internal processing delays resulting in late registry population. For six of these ICPs the time taken to claim the ICP and update the status to active as resulted in some periods now being outside the final revision window. Non conformance is recorded for these six ICPs in the **Downstream Reconciliation performance audit report**.

ICP Identifier	Initial Retail / Status Event Date	Input Date	Days Overdue
1001299596NGAF2	21/08/2020	15/12/2022	579
1002105732QT41D	5/08/2020	1/09/2022	518
1001301873NG6A7	23/08/2021	17/05/2023	429
1001302284NG390	5/11/2021	21/07/2023	421
1002123848QT0D3	19/12/2020	8/08/2022	403
1001302183NGD59	12/10/2021	30/05/2023	402
1002156893QTEDC	16/12/2021	28/07/2023	397
1001302491NG274	7/12/2021	1/05/2023	342
1001302693NG8F6	14/02/2022	5/05/2023	302
1002159713QTDF9	5/05/2022	10/07/2023	292
1001302514NG375	9/12/2021	9/02/2023	286
1001302513NGEBF	9/12/2021	9/02/2023	286
1002146169QTDB2	10/08/2021	27/09/2022	281
1001302484NG596	7/12/2021	18/01/2023	273
1001302482NG419	7/12/2021	18/01/2023	273
1001302480NG49C	7/12/2021	18/01/2023	273
1001302483NG85C	7/12/2021	18/01/2023	273
1001303308NGD60	3/06/2022	12/07/2023	273
1001301931NGD83	7/09/2021	30/09/2022	264
1002160408QT70F	12/05/2022	24/05/2023	255
1001302199NG565	15/10/2021	13/10/2022	245
1001302218NGF69	19/10/2021	7/10/2022	239
1001302216NGCF2	19/10/2021	7/10/2022	239
1001302219NG32C	19/10/2021	7/10/2022	239
1001302220NGA85	19/10/2021	7/10/2022	239
1001302217NG0B7	19/10/2021	7/10/2022	239
1001301746NG31F	5/08/2021	22/07/2022	238
1001301743NGE50	5/08/2021	22/07/2022	238
1001301744NG39A	5/08/2021	22/07/2022	238
1001301745NGFDF	5/08/2021	22/07/2022	238

ICP Identifier	Initial Retail / Status Event Date	Input Date	Days Overdue
1001302722NGF05	16/02/2022	24/01/2023	231
1001302720NGF80	16/02/2022	24/01/2023	231
1001302723NG340	16/02/2022	24/01/2023	231
1001302724NGE8A	16/02/2022	24/01/2023	231
1001302721NG3C5	16/02/2022	24/01/2023	231
1001302181NGDDC	12/10/2021	31/08/2022	218
1001302266NG9AF	3/11/2021	19/09/2022	216
1001302095NGF7F	22/09/2021	8/08/2022	215
1000593937PG32E	1/11/2021	13/09/2022	214
1000593936PGF6B	1/11/2021	13/09/2022	214
1000593942PGB3C	1/11/2021	13/09/2022	214
1001302290NG837	9/11/2021	19/09/2022	212
1001302192NGBB1	14/10/2021	22/08/2022	209
1001302907NG914	17/03/2022	13/01/2023	203

Genesis Energy's gas new connections team use the registry RSREADY report to identify ICPs at "new" or "ready" where they are the proposed retailer. The "RSREADY" report was reviewed and 138 ICPs were recorded in the report with a small number dating back more than 12 months and as far as 2011. Where an ICP is no longer required as the gas new connection has been confirmed as being cancelled, Genesis Energy should follow up with the distributor to ensure the ICP is decommissioned on the registry. This will ensure that the results from the RSREADY report are current and accurate.

Recommendation	Audited party comment
Once a new connection has been confirmed as cancelled, follow up with the distributor to ensure the ICP is decommissioned on the registry so that the RSREADY report is an accurate representation of all current new connection ICPs.	**Response**: Agree **Comments**: Our New Connection team has recently transitioned into our wider retailer operations team, we will review this recommendation with a view to improving our current processes / compliance

GENESIS ENERGY TOU (GEND)

The Genesis Energy TOU new connection process follows a similar process to the non TOU ICP process.

The Maintenance Breach History Report (RET breaches) was examined for input dates between 1 August 2022 and 31 July 2023 and no ICPs were recorded in this report.

FRANK ENERGY (GEOL)

Frank Energy no longer performs gas new connections since late 2022.

The Maintenance Breach History Report (RET breaches) was examined for input dates between 1 August 2022 and 31 July 2023. This report contained 21 ICPs (72.4%) where the initial registry update was later than two business days out of a total of 29 new connections with an average number of days to populate the registry of 54.2 days. The records for 17 ICPs were reviewed where the registry update was more than ten business days late and found for all 17 ICPs listed below there were internal processing delays resulting in late registry population. For one ICP (1002107533QT11F) the time taken to claim the ICP and update the status to active as resulted in some periods now being outside the final revision window. Non conformance is recorded for ICP 1002107533QT11F in the **Downstream Reconciliation Performance Audit report.**

ICP Identifier	Initial Retail Event Date	Input Date	Days Overdue
1002107533QT11F	07-Sep-20	10-May-23	664
1002144745QT6BF	14-Jul-21	03-Oct-22	304
1002159920QT0CA	09-May-22	10-Oct-22	105
1001303360NG084	14-Jun-22	12-Oct-22	82
1000597363PG6A6	03-Aug-22	09-Nov-22	66
1002165784QT578	22-Aug-22	16-Nov-22	58
1002165782QT4F7	22-Aug-22	16-Nov-22	58
1000607620PG6B6	01-Aug-22	19-Oct-22	54
1002165783QT8B2	22-Aug-22	10-Nov-22	54
1000607378PG9AF	08-Jul-22	22-Sep-22	52
1000607805PG0A7	12-Aug-22	27-Oct-22	50
1000607047PG28A	26-Jun-22	18-Aug-22	36
1000607049PG111	16-Sep-22	09-Nov-22	34
1000607719PG61B	04-Jul-22	28-Jul-22	16
1000605294PGA4F	27-Sep-22	20-Oct-22	15
1000606914PGEEB	06-Jul-22	28-Jul-22	14
1000605413PG4C9	11-Jul-22	28-Jul-22	11

Frank Energy no longer perform new connections so no longer actively monitor the registry RSREADY report. The 'RSREADY' report for November 2023 contained six ICPs at GIR (ready) status where Frank Energy was the proposed retailer. A review of the six ICPs identified:

- Three ICPs have now been claimed, meter installed and have active status recorded on the registry, two by Genesis Energy and another of another retailer.
- One ICP remains unclaimed and at READY status.
- Two ICPs (1002079115QT7D1 – meter installed 1 July 2023, 1002148326QT20E - meter installed 2 July 2023) have meter event records recorded on the registry but remain unclaimed and at READY status.

Recommendation	Audited party comment
Continue to actively monitor the registry 'RSREADY' report and match the ICPs listed against received customer supply applications to ensure all proposed new connections are accounted for.	**Response**: Agree **Comments**: Genesis will continue to monitor the registry report

Auditor comment		
Non-compliance	Description	
Report section: 6 Rule: 54.1 From: 1 August 2022 To: 31 July 2023	Audit history: Yes Controls: Needs improvement Impact: Minor	**Genesis Energy (GENG)** Registry not populated within two business days of Genesis Energy entering into a contract to supply gas to a consumer for 44 ICPs from a sample of 50 new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. **Frank Energy (GEOL)** Registry not populated within two business days of Frank Energy entering into a contract to supply gas to a consumer for a sample of 17 new connections identified in the Maintenance Breach History Report between 1 August 2022 and 31 July 2023. Two ICPs (1002079115QT7D1, 1002148326QT20E) identified on the RSREADY report with Registry meter event records remain unclaimed by Frank Energy.

Remedial status	Remedial timeframe	Remedial comment
In progress	Ongoing	We will review our current processes and investigate ways of improving our timeline of claiming ICPs Frank Energy no longer processes New Connections

Audited party comment	
The circumstances of the matters outlined in the breach notice.	Several factors contribute to these non-compliances including, processing delays and late paperwork being received from contractors
Whether or not the participant admits or disputes that it is in breach.	Genesis accepts this breach
Estimate of the impact of the breaches (where admitted).	Minor
What steps or processes were in place to prevent the breaches?	A weekly report is run to manage pending / unclaimed ICPs

What steps have been taken to prevent recurrence?	The New Connection team have recently transitioned into the wider retail operation team, and we will review our current processes and investigate ways of improving our timeline of claiming ICPs Frank no longer processes New Connections

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).

The rules do not therefore define a specific period. The data has been assessed against a "two tiered" target of 90% within 5 business days and 100% within 30 business days.

GENESIS ENERGY non TOU (GEND)

Genesis Energy is responsible for maintaining the profile code, allocation group and responsible meter owner through retailer updates. All GENG ICPs use the GGRP profile code so profile changes do not occur. Retailer updates to allocation groups are made directly on the registry and then imported into Gentrack / MSD as part of the regular daily update process. Responsible meter owner changes are updated in Gentrack and then transferred to the registry.

I reviewed the registry list as of 4 September 2023 and found one ICP (0004228390NGACF) where the TOU flag was set to N where the profile code was set to XTOU, and the allocation group was 2. This ICP had been downgraded to non TOU as part of major renovations resulting in a significant reduction in gas load. As part of the downgrade process the ICP switch from GEND (Genesis TOU) to GENG (Genesis non TOU). However, as part of this switch the profile and allocation group codes were not updated to reflect that this ICP was now non TOU.

An analysis of the Genesis participant status events was undertaken to see how promptly the registry was being updated. The event detail report was examined for the period 1 January 2022 to 31 July 2023 to check the timeliness of all status event changes. The table below shows the results of this examination.

Status	Total ICPs	Update greater than 5 days	Update greater than 30 days	Average update days
ACTC	15,862	7,920 (49.9%)	2,445 (15.4%)	19.47
ACTV	11,832	2,849 (24.1%)	590 (5%)	7.97
INACT	4,254	380 (8.9%)	146 (3.4%)	6.93
INACP	438	282 (64.4%)	46 (10.5%)	14.7

The Rules do not define a specific time period to complete registry updates but for the purpose of this audit I checked the reasons for late updates for a sample of 91 ICPs. The selection of ICPs for each status was checked to confirm whether compliance was achieved with the requirement to update the information "as soon as practicable".

I have recorded breach allegations where I consider the reason for the late update was within Genesis Energy's control and additional steps could have been taken to prevent the late update.

Status	ICPs checked	Number of breaches
ACTC	35	32
ACTV	13	8
INACT	30	16
INACP	13	8

ACTC updates

ICP	Event date	Input date	Business days	Status code change	Reason
1002156893QTEDC	18/01/2022	31/07/2023	385	INACT to ACTC	New connection - late transition of consumer from future to current.
1000596532PG54D	16/02/2022	23/06/2023	339	READY to ACTC	New connection - late transition of consumer from future to current.
0001729781QTEC1	3/04/2022	24/07/2023	326	ACTV to ACTC	Attempted Active status change but interbrand switch (GEOL to GENG) in progress so status update failed. Active status Event date day after correct date.
1001119077QTC5F	24/03/2022	5/07/2023	321	ACTV to ACTC	Attempted Active status change but interbrand switch (GEOL to GENG) in progress so status update failed. Active status Event date day after correct date.
0000210441QTCCB	4/05/2022	3/08/2023	315	ACTV to ACTC	Attempted Active status change but interbrand switch (GEOL to GENG) in progress so status update failed. Active status Event date day after correct date.
1000606036PGA32	3/05/2022	1/08/2023	314	READY to ACTC	New connection - late transition of consumer from future to current.
0000326391QTE0B	30/05/2022	25/08/2023	313	INACT to ACTC	Late status update post meter change - Gentrack updated status to inactive but not back to active.
1002160141QTEFE	10/05/2022	25/07/2023	304	READY to ACTC	New connection – incorrect active status date applied to align with customer sign up rather than livening / meter install date. User error.

ICP	Event date	Input date	Business days	Status code change	Reason
1002039004QT3A8	4/05/2022	6/07/2023	296	ACTV to ACTC	Attempted Active status change but interbrand switch (GEOL to GENG) in progress so status update failed. Active status Event date day after correct date.
1002160147QTF71	10/05/2022	6/07/2023	292	READY to ACTC	New connection – incorrect active status date applied to align with customer sign up rather than livening / meter install date. User error.
1001302429NG2D2	8/06/2022	31/07/2023	288	READY to ACTC	New connection - late transition of consumer from future to current.
1002160591QTFBD	16/05/2022	6/07/2023	288	READY to ACTC	New connection – incorrect active status date applied to align with customer sign up rather than livening / meter install date. System issue.
1000602472PG31C	26/05/2022	18/07/2023	287	READY to ACTC	New connection - late transition of consumer from future to current.
1000603455PG223	28/01/2022	14/03/2023	283	ACTV to ACTC	New connection – incorrect active status date applied to align with customer sign up rather than livening / meter install date. System issue.
1000603451PG329	28/01/2022	8/03/2023	279	READY to ACTC	New connection - meter not installed on time - switch request triggered a hurry up to new con team to install meter and allow switch to complete.
1000596533PG908	15/02/2022	28/02/2023	261	READY to ACTC	New connection - late transition of consumer from future to current
1001302503NG412	29/07/2022	10/08/2023	260	ACTV to ACTC	Backdated insert of ACTV status for 11 days.
1001301961NG58B	24/08/2022	2/09/2023	258	READY to ACTC	New connection - late transition of consumer from future to current.
1000606315PG8A4	3/05/2022	2/05/2023	251	READY to ACTC	New connection - late transition of consumer from future to current.
0001003565NGB36	10/03/2022	28/02/2023 8:59	244	INACT to ACTC	New connection - late transition of consumer from future to current.

ICP	Event date	Input date	Business days	Status code change	Reason
1000602514PG467	18/08/2022	1/08/2023	239	READY to ACTC	New connection - late transition of consumer from future to current.
0000294141QT06B	29/04/2022	11/04/2023	239	INACT to ACTC	Status not updated at time of reconnection at time of switch gain.
0001658711QTE53	15/09/2022	18/08/2023	232	INACT to ACTC	Status not updated at time of reconnection at time of switch gain.
1000592715PG955	31/03/2022	22/02/2023	225	READY to ACTC	New connection - late transition of consumer from future to current.
1002148086QT912	17/10/2022	2/09/2023	220	INACT to ACTC	New connection - late transition of consumer from future to current.
0004221091NG929	9/09/2022	25/07/2023	218	INACT to ACTC	Status not updated at time of reconnection at time of switch gain.
0000490221QTB7F	16/08/2022	15/06/2023	209	INACT to ACTC	Status not updated at time of reconnection at time of switch gain.
0042148628PG84D	10/10/2022	3/08/2023	204	INACT to ACTC	meter install processed late in Gentrack.
1000608651PG6CE	4/11/2022	23/08/2023	200	READY to ACTV	New connection - late transition of consumer from future to current.
0001412170QT6ED	2/03/2022	23/09/2022	143	INACT to ACTC	Status not updated at time of reconnection at time of switch gain.
1000502319PG18E	21/10/2022	19/01/2023	61	INACT to ACTC	meter install processed late in GT - identified when ICP was being disconnected again.
1000608545PGE6A	16/09/2022	29/06/2023	196	READY to ACTV	New connection - late transition of consumer from future to current.

ACTV updates

ICP	Event date	Input date	Business days	Status code change	Reason
1000596608PG327	25/08/2022	25/07/2023	229	READY to ACTV	New connection - Customer disputed original livening / move in date resulting in no status event initially loaded

ICP	Event date	Input date	Business days	Status code change	Reason
1001303080NG93D	22/04/2022	17/03/2023	228	READY to ACTV	New connection – Customer moved out before meter was installed in Gentrack and no status event initially loaded.
1000596605PGC7C	25/08/2022	26/06/2023	209	READY to ACTV	User error - meter not set up in Gentrack until June 2023
1000596606PG0BC	25/08/2022	26/06/2023	209	READY to ACTV	User error - meter not set up in Gentrack until June 2023
1000596607PGCF9	25/08/2022	26/06/2023	209	READY to ACTV	New connection - Customer disputed original livening / move in date resulting in no status event initially loaded.
1001301809NG16B	2/12/2022	9/08/2023	170	INACT to ACTV	User error - closed account for wrong date
1001300844NGD35	25/02/2022	6/10/2022	155	INACT to ACTV	User error when installing meter in GT resulted in incorrect inactive status initially applied. Backdated correction then applied.
1000599997PG571	8/02/2022	4/08/2023	374	ACTC to ACTV	meter installed in Gentrack July 2023 - new connection process not completed. Customer had moved out before meter set up completed.

Genesis Energy moves in a dummy 'The New Occupier' consumer to vacant installations while waiting for either a new customer to be identified or for the vacant disconnection process to complete. This enables any meter reading received for the installation to be loaded and validated as part of the billing validation process and consumption detected can be included in the submission process. Once a new customer is set up in Gentrack, 'The New Occupier' consumer is either reversed out or moved out in Gentrack which in turn updates the registry status. In some cases, this Gentrack activity results in backdates registry status updates, however these do not impact Genesis Energy's submission information.

INACT updates

ICP	Event date	Input date	Business days	Reason
0000326391QTE0B	25/02/2022	25/08/2023	376	Late status update post meter change - Gentrack backdated status to inactive once new meter was installed.

0001799311QT32E	1/03/2022	21/03/2023	266	Backdated to align with No Read Code advice from meter reader of property demolished as google maps also showed demolition.
0003024938NG0B6	21/07/2022	23/06/2023	233	Late status change - no reason given
0002011171NGCFA	12/07/2022	8/06/2023	229	Late status change - no reason given
0001797141QT9E1	1/09/2022	13/07/2023	217	Late status change - no reason given
0003019318NGCE5	1/09/2022	8/06/2023	192	Late status change - no reason given
0002058711QT4FF	20/01/2022	19/08/2022	147	Applied backdated INACT event as initial event failed.
0000665011QTCE4	4/11/2022	7/06/2023	146	Applied backdated INACT event as initial event failed.
0004000685NG43D	10/11/2022	12/06/2023	145	Applied backdated INACT event as initial event failed.
0003000698NG8EB	7/11/2022	7/06/2023	145	Applied backdated INACT event as initial event failed.
0002128791QTF60	4/10/2022	27/04/2023	140	Applied backdated INACT event as initial event failed.
0003040615NG96F	2/02/2022	19/08/2022	138	Applied backdated INACT event as initial event failed.
1001300229NG794	17/02/2022	19/08/2022	127	Applied backdated INACT event as initial event failed.
1002151493QT6B0	21/02/2022	19/08/2022	125	Applied backdated INACT event as initial event failed.
1001151236QTE2D	21/02/2022	19/08/2022	125	Applied backdated INACT event as initial event failed.
1000578277PG018	21/02/2022	19/08/2022	125	Applied backdated INACT event as initial event failed.

INACP updates

ICP	Event date	Input date	Business days	Reason
0000028421QT7CF	16/02/2022	20/12/2022	214	late update – internal processing delay
0003017684NGDD9	19/12/2022	27/07/2023	150	late update – internal processing delay
0004213062NG792	28/10/2022	21/04/2023	120	late update – internal processing delay
0000842781QTBBA	13/07/2022	8/12/2022	106	late correction from INACT to INACP status.
0000017539GN280	5/07/2022	21/11/2022	99	late update – internal processing delay
0001036275PG4ED	20/02/2023	3/07/2023	92	late update – internal processing delay

0000029669GN067	16/05/2022	8/09/2022	82	late update – internal processing delay
1001295789NGE06	29/01/2022	26/05/2022	81	late correction from INACT to INACP status.

Genesis Energy runs a status alignment report at least monthly to identify status mismatches between Gentrack and the gas registry and exceptions are investigated and corrected. This report stopped functioning for a period of time during the audit period resulting in a number of delayed registry updates.

Registry retailer update timeliness

I reviewed the event detail report to identify all retailer updates made by Genesis Energy between 1 January 2022 and 31 July 2023.

Update type	Total updates	Update greater than five business days	Update greater than 20 business days	Latest update business days	Average update days
Retailer	2,481	1,318	239	633	18.3

A sample of ten ICPs were reviewed to identify the reasons for the late retail event updates. In all ten cases the retail event related to a new connection where the initial retail event date was applied to align with the ICP creation date as opposed to reflect the date Genesis Energy had receipted a signed customer agreement for the new connection.

Recommendation	Audited party comment
Review the new connection process of back dating the initial retail event to align with the ICP creation date to ensure the ICP is claimed from the date Genesis Energy has entered into an agreement with a customer for the ICP.	**Response**: Agree **Comments**: We will take this recommendation into consideration and review what action can be taken to strengthen our current reporting / controls

GENESIS ENERGY TOU (GEND)

Genesis Energy is responsible for maintaining the profile code, allocation group and responsible meter owner through retailer updates. All GENG ICPs use the GGRP profile code, so profile changes do not occur. Retailer updates to allocation groups are made directly on the registry and then imported into Gentrack / Oracle SQL database as part of the regular daily update process. Responsible meter owner changes are updated in Gentrack and then transferred to the registry.

A check of ICPs where a telemetry owner is recorded on the registry to ensure these ICPs were assigned to allocation group 1 was undertaken. Four active ICPs were identified where the allocation group was recorded as allocation group 2 and a telemetry owner was also recorded.

ICP Number	Meter Owner	Telemetry Owner	Allocation group
0000136921QT68A	NGCM	NGCM	2
1000518821PG1CD	POCO	POCO	2
1001146666VT8BE	VCTX	VCTX	2
1001263001QT0C0	NGCM	NGCM	2

The Rules do not define a specific time period to complete registry updates but for the purpose of this audit I checked the reasons for late updates for a sample of 9 ICPs. The selection of ICPs for each status was checked to confirm whether compliance was achieved with the requirement to update the information "as soon as practicable".

I have recorded breach allegations where I consider the reason for the late update was within Genesis Energy's control and additional steps could have been taken to prevent the late update.

Status	Total ICPs	Update greater than 5 days	Update greater than 30 days	Average update days
ACTC	4	4	4	116
ACTV	2	2	2	65.5
INACT	3	2	1	21
INACP	-	-	-	-

I checked a selection of ICPs for each status to confirm whether compliance was achieved with the requirement to update the information "as soon as practicable".

Status	ICPs checked	Number of breaches
ACTC	4	2
ACTV	2	-
INACT	2	2
INACP	-	-

ACTC updates

ICP	Event date	Input date	Business days	Status code change	Reason
0002037531QT895	25/03/2023	27/06/2023	63	INACT to ACTC	Late disconnection and reconnection updates applied manually
0009000903NGE73	9/02/2023	7/07/2023	103	INACT to ACTC	Late disconnection and reconnection updates applied manually

INACT updates

ICP	Event date	Input date	Business days	Reason
0009000903NGE73	9/08/2022	29/09/2022	38	Late disconnection and reconnection updates applied manually
0002037531QT895	22/02/2023	27/03/2023	24	Late disconnection and reconnection updates applied manually

FRANK ENERGY

The Rules do not define a specific time period to complete registry updates but for the purpose of this audit I checked the reasons for late updates for a sample of 45 ICPs. The selection of ICPs for each status was checked to confirm whether compliance was achieved with the requirement to update the information "as soon as practicable".

I have recorded breach allegations where I consider the reason for the late update was within Genesis Energy's control and additional steps could have been taken to prevent the late update.

Status	Total ICPs	Update greater than 5 days	Update greater than 30 days	Average update days
ACTC	2,604	1,395	458	21.75
ACTV	11,832	2,489	590	7.97
INACT	736	198	40	8.52
INACP	53	45	17	50.26

I checked a selection of ICPs for each status to confirm whether compliance was achieved with the requirement to update the information "as soon as practicable".

Status	ICPs checked	Number of breaches
ACTC	15	11
ACTV	15	-
INACT	10	6
INACP	5	5

ACTC updates

ICP	Event date	Input date	Business days	Status code change	Reason
0002035461QTAD9	4/07/2022	31/07/2023	271	INACT to ACTC	Status not updated at time of reconnection at time of switch gain
0001767511QT874	20/06/2022	12/04/2023	205	INACT to ACTC	New connection - late transition of consumer from future to current
0003021334NGE82	9/08/2022	29/05/2023	202	INACT to ACTC	Status not updated at time of reconnection at time of switch gain
1000596838PG2D4	28/07/2022	8/05/2023	195	INACT to ACTC	New connection - late transition of consumer from future to current
0001805781QT2F6	6/12/2022	15/08/2023	172	INACT to ACTC	Status not updated at time of reconnection at time of switch gain

ICP	Event date	Input date	Business days	Status code change	Reason
0002382472QTA69	9/02/2022	12/09/2022	149	INACT to ACTC	Status not updated at time of reconnection at time of switch gain
1000607047PG28A	26/06/2022	9/01/2023	137	READY to ACTC	New connection - late transition of consumer from future to current
0001660861QT82D	3/03/2022	12/09/2022	133	INACT to ACTC	New connection - late transition of consumer from future to current
1000605976PG37E	4/05/2022	9/11/2022	133	INACT to ACTC	New connection - late transition of consumer from future to current
1002045480QTAD0	27/10/2022	3/05/2023	128	INACT to ACTC	Status not updated at time of reconnection at time of switch gain
1000605640PGA06	5/01/2023	6/07/2023	126	INACT to ACTC	Status not updated at time of reconnection at time of switch gain

ACTV updates

Frank Energy moves in a dummy 'The New Occupier' consumer to vacant installations while waiting for either a new customer to be identified or for the vacant disconnection process to complete. This enables any meter reading received for the installation to be loaded and validated as part of the billing validation process and consumption detected can be included in the submission process. Once a new customer is set up in Gentrack, 'The New Occupier' consumer is either reversed out or moved out in Gentrack which in turn updates the registry status. In some cases, this Gentrack activity results in backdates registry status updates, however these do not impact Frank Energy's submission information. For all 15 ICPs sampled compliance was achieved with the requirement to update the information 'as soon as practicable'.

INACT updates

ICP	Event date	Input date	Business days	Reason
0003005474NGC68	21/06/2022	17/01/2023	146	late update – internal processing delay
1001285796QT552	14/01/2022	28/07/2022	135	Backdated correction of INACT date
0002240151QTD65	3/11/2022	3/05/2023	123	late update – internal processing delay
0002006574NG135	10/02/2022	28/07/2022	116	Backdated insert of INACT status
1002039426QT279	1/03/2022	29/07/2022	104	Backdated insert of INACT status
0001834191QTED1	4/11/2022	29/03/2023	100	late correction from ACTV to INACT

ICP	Event date	Input date	Business days	Reason
0004202530NG35B	1/04/2022	25/07/2022	77	Backdated insert of INACT status

INACP updates

ICP	Event date	Input date	Business days	Reason
0000192831QT54B	20/07/2022	30/08/2023	281	late correction from INACT to INACP.
0000027841QTD53	1/09/2022	30/08/2023	250	late correction from INACT to INACP.
0000016341QTED1	24/10/2022	30/08/2023	213	late update – internal processing delay
0000031401QTEDB	4/11/2022	30/08/2023	205	late update – internal processing delay
0000020271QT4C1	7/11/2022	30/08/2023	204	late update - Human error.

Frank Energy runs a status alignment report at least monthly to identify status mismatches between Gentrack and the gas registry and exceptions are investigated and corrected. This report stopped functioning for a period of time during the audit period resulting in a number of delayed registry updates.

Registry retailer update timeliness

I reviewed the event detail report to identify all retailer updates made by Frank Energy between 1 January 2022 and 31 July 2023.

Update type	Total updates	Update greater than five business days	Update greater than 20 business days	Latest update business days	Average update days
Retailer	2,481	1,318	239	633	18.3

A sample of ten ICPs were reviewed to identify the reasons for the late retail event updates. In eight cases the retail event related to a new connection where the initial retail event date was applied to align with the ICP creation date as opposed to reflect the date Frank Energy had receipted a signed customer agreement for the new connection. The other two cases were related to late paperwork or information from the meter owner for these new connections.

Auditor comment			
Non-compliance	Description		
Report section: 7 Rule: 58.1, 61.1 From: 14 Jan 2022 To: 30 August 2023	Audit history: No Controls: Needs improvement Impact: Minor	**Genesis Energy non TOU (GENG)** For ICP 0004228390NGACF the TOU flag was set to N however the profile code was set to XTOU, and the allocation group was 2. ICP status was not updated on the registry as soon as practicable for 64 of the 91 late updates checked. **Genesis Energy TOU (GEND)** Four active ICPs with telemetry are incorrectly assigned allocation group 2. ICP status was not updated on the registry as soon as practicable for four of the eight late updates checked. **Frank Energy (GEOL)** ICP status was not updated on the registry as soon as practicable for 22 of the 45 late updates checked.	
Remedial action rating	Remedial timeframe	Remedial comment	
In progress	October 2024	See below	
Audited party comment			
The circumstances of the matters outlined in the breach notice.	There are various contributing factors including workflow management, late paperwork from contractors and inaccuracies in data entry		
Whether or not the participant admits or disputes that it is in breach.	Genesis accepts this breach		
Estimate of the impact of the breaches (where admitted).	Minor		
What steps or processes were in place to prevent the breaches?	Monthly reporting is run to identify discrepancies between our system and the Gas Registry.		
What steps have been taken to prevent recurrence?	Genesis will review current processes regarding registry management with a view to improving timeliness and accuracy Genesis will review current process for identifying ICP with telemetry and establish a process of ensuring these are moved to the correct allocation group. Genesis will also review current processes regarding registry management with a view to improving timeliness and accuracy		

8. Resolving discrepancies (rule 62.1)

As discussed in **sections 6** and **7,** Genesis Energy and Frank Energy have a set of validation processes and reports to identify and resolve discrepancies between Gentrack and the registry, which was demonstrated during the audit. Also, registry acknowledgement files are monitored for failed status events which are investigated, and updates are then applied manually either directly in the registry or in Gentrack.

I checked several of the validation reports in detail, specifically those where errors could lead to incorrect submission of consumption information to the allocation agent.

- ICP status discrepancies, including status change dates.
- Altitude – this is a check between Gentrack and the registry, any adjustments flow through to the relevant submission and revision files,
- Meter Attribute discrepancies.
- Allocation group, and
- Gas gate.

GENESIS ENERGY

A review of ICPs where multiple status and retailer event reversals or replacement events had occurred was undertaken and none were identified for the period of 1 January 2022 to 31 July 2023.

ICP status and connection status

Genesis Energy updates ICP statuses and connection statuses where field services activity indicates a status change is required. Genesis Energy validates the connection status and ICP recorded in Gentrack against the registry monthly, including identifying ICPs where metering is installed but the connection status indicates the meter is removed, and ICPs with no meter installed in the registry but where the connection status indicates a meter is present.

A sample of 10 ICPs were reviewed and found:

- For three ICPs the metering had been removed confirmed as being removed at the ICP, but the metering event had not been updated.
- For ICP 0000614641QT9F3 a new meter event was added in 2019 but this meter is not reflected in Gentrack and the registry status is incorrect.
- For ICPs 0000747871QTDF8 (Meter 0000747871QTDF8 installed 21 January 2022), 0001562441QT680 (INACT 8 August 2009) and 0003012346NG896 (INACP 10 May 2022), all have current consuming customers set up in Gentrack confirming that the registry status is incorrect and consumption volumes are not being included in the submission process.
- For three ICPs (0000335431QT317, 0000349781QT39F, 0001545832QTEBC), These ICPs were part of the EGAS group of ICPs that were switched to Genesis as part of dissolution of the EGAS customer base however there is no record of these ICPs in Gentrack to enable effective monitoring of these ICPs against the registry information.

Recommendation	Audited party comment
Ensure all ex EGAS ICPS that have not been decommissioned are set up in Gentrack to enable monitoring of registry information.	**Response:** Genesis agrees with this recommendation **Comments:** The above EGAS ICPs have all been set-up in Gentrack, a review will be conducted to ensure there are no missing ICPs

Allocation groups

A report is generated manually which lists the differences in allocation groups recorded in both Gentrack and against the registry for each ICP and also validates the annualised consumption against the allocation group 4 and 6 thresholds. Exceptions are listed in this report for investigation and to enable updates to Gentrack, registry or both. The report is run on an ad hoc basis and was last run in August 2023 in preparation of the gas audit. This is the only run of the report in the last 12 months.

Genesis Energy provided their most recent report which confirmed that ICPs were reviewed and where necessary updates to the allocation group was applied in the registry from 1 August 2023. Genesis Energy then requests the meter read frequency updates to be applied with their meter reading agent.

A review the meter read frequency of ten ICPs recently updated to allocation group 4 was undertaken and found that for six ICPs[1] meter readings have not been obtained monthly since 1 August 2023.

Recommendation	Audited party comment
Ensure allocation group exception report is run and reviewed on a regular cycle.	**Response:** Genesis agrees with this recommendation **Comments:** A monthly process is currently being established for this
Review process to update the allocation group value for an ICP to ensure that the meter reading frequency requirements have been confirmed as being updated by the meter reading agent prior to updating the allocation group on the registry.	**Response:** Genesis agrees with this recommendation **Comments:** A monthly process is currently being established for this

An additional review of annualised consumption volumes provide by Genesis against the registry allocation group values was performed to confirm the accuracy of the Genesis Energy allocation group exception reporting. Nine allocation group 4 ICPs with annualised consumption below 250 GJ were identified that were not included in the Genesis Energy allocation group exception reporting.

ICP	Load Shedding Category	Annualised GJ	Allocation Group Code	ICP Status Code	Comment
0007002982NGE73	4	184.394	4	ACTC	Not picked up in our previous report in August 2023.

[1] ICPs 1002147083QTD3D, 1000595869PG479, 0003067309NG874, 0000916561QTA9F, 0000692481QTEFE, 1000570415PG46B.

0001858501QT4EF	4	175.952	4	ACTC	Not picked up in our previous report in August 2023.
0001443754QTE60	4	175.347	4	ACTC	Not picked up in our previous report in August 2023.
0000017331QTA2C	4	169.454	4	ACTC	Not picked up in our previous report in August 2023.
0009000470NG2E6	4	147.548	4	ACTC	Not picked up in our previous report in August 2023.
0004224654NG2AF	4	133.685	4	ACTC	Not picked up in our previous report in August 2023.
0009000364NG643	4	132.879	4	ACTC	Not picked up in our previous report in August 2023.
0004213221NG3F0	4	119.357	4	ACTC	Not picked up in our previous report in August 2023.
1001279230NG11D	4	27.813	4	ACTC	Not picked up in our previous report in August 2023.

Recommendation	Audited party comment
Review allocation group exception report selection criteria to identify why some ICPs appear to be missing from this report.	**Response:** Genesis agrees with this recommendation **Comments:** Genesis will review the current selection criteria to ensure all exceptions are identified and investigated

Network and gas gate

Current values for gas gates and networks are compared against the registry regularly.

Each ICP's network and gas gate in Gentrack was compared to a registry LIS file from 1 September 2023. No network or gas gate discrepancies were identified.

ICP altitude

The altitude in Gentrack / MSD was compared to a registry LIS file from 1 September 2023 for all active ICP's and no exceptions were identified.

A sample of 30 non-TOU ACTC or ACTV ICPs per distributor from the registry list as of 1 September 2023 was selected from a subset of ICPs where the standard deviation of altitude maximum and maximum values by street was more than 10 standard deviations. A further random sample of ten non-TOU ACTC or ACTV ICPs per distributor were also selected.

This sample of ICPs were checked against "google earth" data. The "google earth" data is based on the "Shuttle Radar Topography Mission" (SRTM) results and a number of recent studies indicate an accuracy of ± 10m for altitude. An evaluation against this data is considered an appropriate test for "reasonableness". Altitude figures that are within approximately 90m of the actual altitude will ensure an accuracy of ± 1.0%.

Section **3.8.2.3** of **NZS5259:2015** recommends altitude figures are determined to within 10m where practicable. An evaluation of altitude data on the registry was conducted to check whether this

recommendation had been met. As noted above, the margin of error of the 'google earth' data appears to be approximately ± 10m, therefore, to allow for this margin, I have checked that the registry data is within 20m of 'google earth' data.

As shown in the table below the altitude data on the registry for non-TOU ICPs appears to be accurate in most areas.

Distributor	Total ACTC and ACTV non-TOU ICPs	ICPs checked	Quantity outside 20m	Quantity outside 90m
UNLG	24,863	30	11	-
NGCD	25,598	30	-	-
POCO	41,507	30	8	1
GNET	3,779	30	-	-
Total	**95,747**	**120**	**19**	**-**

I have considered whether distributors have potentially breached any rules by populating the registry with inaccurate altitude information. Distributors have responsibility for populating the registry with altitude figures[1] and for maintaining the accuracy of this information. 18 ICPs were found to have a difference of more than 20m however the differences were not over the maximum permissible errors allowed under **NZS 5259:2015**

ICP	Distributor Code	Network Pressure	Meter Pressure	ICP Altitude	Gentrack Altitude	Google Earth Altitude	Difference	Altitude factor Gentrack	Altitude factor Google Earth	% Difference
0004227050NG743	POCO	118	3	66	66	6	60	0.992459	0.999314	-0.7%
0004228728NG668	POCO	118	3	64	64	6	58	0.992687	0.999314	-0.7%
0004227220NG819	POCO	118	3	66	66	6	60	0.992459	0.999314	-0.7%
0004227049NG3BF	POCO	118	3	66	66	6	60	0.992459	0.999314	-0.7%
0004227237NGF7E	POCO	118	3	66	66	6	60	0.992459	0.999314	-0.7%
0004216929NG5CA	POCO	118	1.5	67	67	6	61	0.992233	0.999304	-0.7%
1001299921QTF40	UNLG	400	2.75	96	96	15	81	0.989004	0.998282	-0.9%
1002055573QT7E2	UNLG	400	2.75	83	83	26	57	0.990493	0.997022	-0.7%
1002057884QTC77	UNLG	400	2.75	36	36	93	-57	0.995877	0.989348	0.7%
0004215365NGC9B	POCO	118	3	165	165	226	-61	0.981146	0.974176	0.7%
1002111187QT387	UNLG	400	2.75	75	75	19	56	0.991410	0.997824	-0.6%
1002106281QTD8A	UNLG	400	2.75	75	75	19	56	0.991410	0.997824	-0.6%
1002171908QTB46	UNLG	400	2.75	97	97	27	70	0.988890	0.996907	-0.8%
1002164000QTF9A	UNLG	400	2.75	6	6	60	-54	0.999313	0.993128	0.6%
1002182844QT485	UNLG	400	2.75	35	35	111	-76	0.995991	0.987286	0.9%
1002182863QT41A	UNLG	400	2.75	38	38	111	-73	0.995648	0.987286	0.8%
1002057884QTC77	UNLG	400	2.75	36	36	101	-65	0.995877	0.988432	0.8%
0001446658QT35A	UNLG	400	2.75	10	10	46	-36	0.998855	0.994731	0.4%

[1] Gas (Switching Arrangements) Rules 2008, Part A, ICP parameters maintained by Distributors and rules 41 and 58.

There was one altitude discrepancies which resulted in an altitude factor which was outside the threshold allowed by **NZS 5259:2015**. Non conformance is recorded in **section 2.1.2** of the **Downstream Regulations Performance Audit report**.

ICP	Distributor Code	Network Pressure	Meter Pressure	ICP Altitude	Gentrack Altitude	Google Earth Altitude	Difference	Altitude factor Gentrack	Altitude factor Google Earth	% Difference
0002288991QT337	POCO	118	1.5	166	166	5	161	0.9808	0.9994	-1.9%

A further evaluation was conducted of ICPs where the altitude was zero on the registry. This data historically appears to be less accurate than when a figure other than zero is populated. All 30 ICPs reviewed have an altitude difference of less than 20m.

Network pressure

I compared each ACTC and ACTV ICP's network pressure in Gentrack / MSD to the registry list and found no differences were found between network pressures recorded in Gentrack / MSD and the registry.

Meter numbers and digits

Genesis Energy has a validation report and processes to identify and resolve meter number and number of digit discrepancies between Gentrack / MSD and the registry in case field work paperwork from the meter owner is late or incorrect. Additionally, the meter reading processes are designed to identify meter number or digit discrepancies.

A review of meter serial numbers and meter digits between the registry and Gentrack / MSD was conducted and no were found.

Meter pressure

Current values for meter pressure are validated against the registry monthly. The report identifies ICPs where the serial number recorded in Gentrack / MSD and the registry are the same, but the pressure is different. Meter pressure is then corrected for the affected period.

A comparison the meter pressure in Gentrack / MSD to a registry list as of 1 September 2023 for each ACTC and ACTV ICP where the meter number had matched, or where the meter number difference related to a different prefix or suffix. No differences were identified.

Meter multiplier

A comparison of Gentrack / MSD and registry information as of 1 September 2023 was performed and no multiplier mismatches were identified.

Rule 62.1 requires the responsible retailer to use "best endeavours" to resolve discrepancies between their data and registry data. The best endeavours requirements were not consistently met for all data fields.

FRANK ENERGY

ICP status and connection status

Frank Energy updates ICP statuses and connection statuses where field services activity indicates a status change is required. Frank Energy validates the connection status and ICP recorded in Gentrack against the registry monthly, including identifying ICPs where metering is installed but the connection status indicates the meter is removed, and ICPs with no meter installed in the registry but where the connection status indicates a meter is present.

A sample of 13 ICPs were reviewed and found in 12 cases that the ICP connection status code was incorrect as the code incorrectly reflected that a meter was present however the metering event and Gentrack information confirmed that the meter had been removed.

ICP	Registry connection status code	Correct connection status code	Reason
0001372470PGE05	GVC	GVM	Registry not updated when meter was removed.
0001344781PG5B8	GVC	GVM	User error selecting correct connection status code.
0001600181QT9C6	GVC	GVM	Registry not updated when meter was removed.
0001501171QT4C5	GVT	GVM	Registry not updated when meter was removed.
0001560761QTB96	GVC	GVM	Registry not updated when meter was removed.
0001770281QT410	GVC	GVM	Registry not updated when meter was removed.
0002017151QT2A9	GNC	GNM	User error selecting correct connection status code.
0002045871QT6C1	GVC	GVM	User error selecting correct connection status code.
0003024033NG76B	GVC	GVM	User error selecting correct connection status code.
0041122111PG935	GVC	GVM	Registry not updated when meter was removed.
1000501701PG7D6	GVC	GVM	Registry not updated when meter was removed.
1001139591QTBA2	GVC	GVM	Registry not updated when meter was removed.

Allocation groups

A report is generated manually which lists the differences in allocation groups recorded in both Gentrack and against the registry for each ICP and also validates the annualised consumption against the allocation group 4 and 6 thresholds. Exceptions are listed in this report for investigation and to enable updates to Gentrack, registry or both. The report is run on an ad hoc basis and was last run in August 2023 in preparation of the gas audit.

Frank Energy provided their most recent report confirmed that ICPs were reviewed and where necessary updates to the allocation group was applied in the registry from 1 August 2023. Frank Energy then requests the meter read frequency updates to be applied with their meter reading agent.

A review the meter read frequency of ICPs recently updated to allocation group 4 was undertaken and found that for all sampled ICPs, meter readings were successfully obtained monthly since 1 August 2023.

Network and gas gate

Current values for gas gates and networks are compared against the registry regularly.

Each ICP's network and gas gate in Gentrack was compared to a registry LIS file from 1 September 2023. No network or gas gate discrepancies were identified.

ICP altitude

The altitude in Gentrack / MSD was compared to a registry LIS file from 1 September 2023 for all active ICP's and no exceptions were identified.

The altitude in Gentrack / MSD was compared to a registry LIS file from 1 September 2023 for all active ICP's and no exceptions were identified.

A sample of 30 non-TOU ACTC or ACTV ICPs per distributor from the registry list as of 1 September 2023 was selected from a subset of ICPs where the standard deviation of altitude maximum and maximum values by street was more than 10 standard deviations. A further random sample of ten non-TOU ACTC or ACTV ICPs per distributor were also selected.

This sample of ICPs were checked against "google earth" data. The "google earth" data is based on the "Shuttle Radar Topography Mission" (SRTM) results and a number of recent studies indicate an accuracy of ± 10m for altitude. An evaluation against this data is considered an appropriate test for "reasonableness". Altitude figures that are within approximately 90m of the actual altitude will ensure an accuracy of ± 1.0%.

Section **3.8.2.3** of **NZS5259:2015** recommends altitude figures are determined to within 10m where practicable. An evaluation of altitude data on the registry was conducted to check whether this recommendation had been met. As noted above, the margin of error of the 'google earth' data appears to be approximately ± 10m, therefore, to allow for this margin, I have checked that the registry data is within 20m of 'google earth' data.

As shown in the table below the altitude data on the registry for non-TOU ICPs appears to be accurate in most areas.

Distributor	Total ACTC and ACTV non-TOU ICPs	ICPs checked	Quantity outside 20m	Quantity outside 90m
UNLG	5,508	30	2	-
NGCD	3,712	30	-	-
POCO	4,386	30	-	-
GNET	360	30	-	-
Total	**13,426**	**100**	**2**	**-**

I have considered whether distributors have potentially breached any rules by populating the registry with inaccurate altitude information. Distributors have responsibility for populating the registry with altitude figures[1] and for maintaining the accuracy of this information. Two ICPs were found to have a difference of more than 20m however the differences were not over the maximum permissible errors allowed under **NZS 5259:2015**

ICP	Distributor Code	Network Pressure	Meter Pressure	ICP Altitude	Gentrack Altitude	Google Earth Altitude	Difference	Altitude factor Gentrack	Altitude factor Google Earth	% Difference
1002162602QTCD9	UNLG	400	2.75	4	4	50	-46	0.99954	0.99427	-0.5%
0001419742QT876	UNLG	400	3	9	9	54	-45	0.99897	0.99383	-0.5%

[1] Gas (Switching Arrangements) Rules 2008, Part A, ICP parameters maintained by Distributors and rules 41 and 58.

A further evaluation was conducted of ICPs where the altitude was zero on the registry. This data historically appears to be less accurate than when a figure other than zero is populated. All seven ICPs reviewed have an altitude difference of less than 20m.

Network pressure

I compared each ACTC and ACTV ICP's network pressure in Gentrack / MSD to the registry list and found no differences were found between network pressures recorded in Gentrack / MSD and the registry.

Meter numbers and digits

Genesis Energy has a validation report and processes to identify and resolve meter number and number of digit discrepancies on behalf of Frank Energy between Gentrack / MSD and the registry in case field work paperwork from the meter owner is late or incorrect. Additionally, the meter reading processes are designed to identify meter number or digit discrepancies.

A review of meter serial numbers and meter digits between the registry and Gentrack / MSD was conducted and no were found.

Meter pressure

Current values for meter pressure are validated against the registry monthly. The report identifies ICPs where the serial number recorded in Gentrack / MSD and the registry are the same, but the pressure is different. Meter pressure is then corrected for the affected period.

A comparison the meter pressure in Gentrack / MSD to a registry list as of 1 September 2023 for each ACTC and ACTV ICP where the meter number had matched, or where the meter number difference related to a different prefix or suffix. No differences were identified.

Meter multiplier

A comparison of Gentrack / MSD and registry information as of 1 September 2023 was performed and no multiplier mismatches were identified.

Rule 62.1 requires the responsible retailer to use "best endeavours" to resolve discrepancies between their data and registry data. The best endeavours requirements were not consistently met for all data fields.

Auditor comment		
Non-compliance	Description	
Report section: 8 Rule: 62.1 From: 1 October 2020 To: 31 October 2023	Audit history: Yes Controls: Needs improvement Impact: Minor	**Genesis Energy (GENG)** Genesis Energy did not consistently use best endeavours to identify and resolve discrepancies. **ICP status and connection status** 5 ICPs from a sample of ten have incorrect inactive status recorded on the registry. **Allocation groups** A review the meter read frequency of ten ICPs recently updated to allocation group 4 was undertaken and found that for six ICPs meter readings have not been obtained monthly since 1 August 2023. Nine allocation group 4 ICPs with annualised consumption below 250 GJ were identified that were not included in the Genesis Energy allocation group exception reporting. **Frank Energy (GEOL)** Frank Energy did not consistently use best endeavours to identify and resolve discrepancies. **ICP status and connection status** 12 ICPs from a sample of 13 where the ICP connection status code was incorrect as the code incorrectly reflected that a meter was present however the metering event and Gentrack information confirmed that the meter had been removed.

Remedial action rating	Remedial timeframe	Remedial comment
In progress	September 2024	The ICPs with the incorrect status are in the process of being investigated and updated accordingly. Allocation group 4 ICPs to be prioritised in relation to being unable to obtain reads

Audited party comment	
The circumstances of the matters outlined in the breach notice.	A no access process in place, however allocation group 4 ICPs are not prioritised as part of this
Whether or not the participant admits or disputes that it is in breach.	Genesis accepts this breach
Estimate of the impact of the breaches (where admitted).	Minor

What steps or processes were in place to prevent the breaches?	We have a process (No Access) for investing ICPs we have been unable to read
What steps have been taken to prevent recurrence?	The no access report is to be updated to prioritise allocation group 4 ICP that we have not been able to obtain a reading for.

9. Switching

9.1. Initiation of consumer switch / switching notice (rules 65 to 67)

Genesis Energy and Frank Energy have valid and subsisting agreements with all relevant distributors as listed below.

Distributor	Agreement type
First Gas	Operating arrangement in place
Vector	Current UoSA
Powerco	Current UoSA
GasNet	Operating arrangement in place

GENESIS ENERGY

GNT timeliness

The processes for the initiation of a switch were reviewed for compliance with the requirement for a gas switching notice to be sent within 2 business days of entering a contract to supply gas to the consumer unless the contract to supply gas is entered into more than 12 business days in advance of the commencement date. (**Rule 66.1**)

Where Genesis Energy is the gaining retailer either a CSR completes the sign up which includes going to the registry to get the relevant registry information for new connections and switching. Or a customer can complete an online application which is then validated against Registry information via an automated process. Validated customer and ICP information are then entered / uploaded into Gentrack and a GNT file this then automatically created. Any errors arising from the GNT creation is then managed by the switching team.

Genesis completed 19,266 non TOU GNT and 23 TOU GNT files for the period 1 January 2022 to 31 July 2023. A sample of 42 GNT files were reviewed to confirm they were sent within two business days of entering into a contract to supply gas to the consumer and found:

- 12 of the 42 files (28.5%) were not sent within two business days of the agreement date.
    - For two files, a second GNT file was required as the initial GNT file was withdrawn on request of the losing trader and the initial GNT file was submitted within two business days of the agreement date.

- Five GNT files related to future dated customer agreements where the delivery of the GNT file was delayed to ensure it was not sent earlier than 10 business days prior to the requested switch date.
- Five GNT files listed in the table below were submitted more than two business days of entering into a contract to supply gas to the consumer.

ICP	Event date	Input date	Date agreement was entered into with customer / preconditions met	Business days	Reason for delay
1002055301QT43C	9/05/2023	28/04/2023	19/04/2023	6	User error – GNT paused as the proposed switch date was more than 12 business days in advance. GNT not correctly restarted.
0002377240QT9AE	22/06/2023	22/06/2023	14/06/2023	6	Delay in processing sign up received from 3rd party agent
0002346061QT235	11/10/2022	11/10/2022	2/10/2022	6	Delay in processing sign up received from 3rd party agent
1002080605QTB42	1/12/2021	14/06/2023	2/02/2023	383	No access identified issue of wrong ICP - backdated switch more than one year to honour original application for supply.
0001016517NG12F	10/06/2021	21/10/2022	10/06/2021	346	GNT failed to be created - exception created but not actioned - did not reappear as an exception again. Did not get processed until October 2022 when ICP was disconnected by other retailer.

A NTD breach was recorded for non TOU ICP 0004224678NGCE4, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch. The initial GNT file failed to be successfully processed by Gentrack and a manual GNT file was created and uploaded to the registry two days later. However, this manual file retained the original requested switch date that was now in the past.

Two NTD breaches were recorded for TOU ICP 0001028461NG515, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch. In both cases the incorrect switch type was being applied.

No GNT files were sent more than 10 business days in advance of the switch date. Compliance is confirmed.

GNT content

The accuracy of GNT files were assessed by reviewing a sample of GNT files where a gas notification of withdrawal was created with request reason codes of WS – Wrong Switch Type, DF – Date Fail, UA – Unauthorised Switch or WP – Wrong Property.

- Request reason code WS – Wrong Switch Type; a sample of five GNT files were reviewed and one GNT (ICP 0000509601QT523) was confirmed as being sent with the incorrect switch type.

- Request reason code DF – Date Fail; a sample of six GNT files were reviewed and two GNT's (ICPs 0002289861QTB84 and 1000592961PGB09 were confirmed as being sent with incorrect requested switch dates.
- Request reason code UA – Unauthorised Switch; a sample of two GNT files were reviewed, and both were confirmed as being accurate.
- Request reason code WP – Wrong Property; a sample of eight GNT files were reviewed, and three GNT's (ICPs 1001295283NG992, 1002140587QTD52, 1002141985QT07B) were identified as being sent for an incorrect address where the process is where similar addresses are present on the gas registry that metering information is requested from the customer to verify the correct address. This process was not performed for three ICPs.

FRANK ENERGY

The sign up process is the same as described above for Genesis Energy.

GEOL completed 5,330 GNT files for the period 1 January 2022 to 31 July 2023. A sample of 28 GNT files were reviewed to confirm they were sent within two business days of entering into a contract to supply gas to the consumer and found:

- Five of the 28 files (17.9%) were not sent within two business days of the agreement date.
    - Three GNT files (ICPs 1000563170PG9D0 – 662 days, 0001424174QT30B - 556 days, 1000596140PGC94 – 438 days) relate to wrong property switches where the correct ICP was then requested. All three switches had event dates that were backdated more than 13 months resulting in some consumption volumes not able to be included in the submission process. Non Conformance is recorded in **section 5.2** of the **Downstream Reconciliation Performance Audit report.**
    - Two GNT files (ICPs 0000016671GN092, 0000014939GNC6C) were submitted more than two business days of entering into a contract to supply gas to the consumer. In both cases the ICPs were inactive and unmetered and the customer had requested meter install and reconnection. Genesis waited for the fieldwork to be completed prior to initiating the switch as opposed to switching the ICP then initiating the required fieldwork.

All GNT files for standard switches were sent prior to the event date. Compliance is confirmed.

No GNT files were sent more than 10 business days in advance of the switch date. Compliance is confirmed.

The accuracy of GNT files were assessed by reviewing a sample of GNT files where a gas notification of withdrawal was created with request reason codes of WS – Wrong Switch Type, DF – Date Fail, UA – Unauthorised Switch or WP – Wrong Property.

- Request reason code WS – Wrong Switch Type; a sample of ten GNT files were reviewed and for one GNT file (ICP 0000284341QT28D) it was confirmed that the incorrect switch type was selected by Frank Energy. For three other GNT files (ICPs 0000022451GN06C, 0001434521QT2AC, 0002027773NGE95) it was confirmed that the incorrect switch type was selected by the customer as part of the online sign up process.
- Request reason code DF – Date Fail; a sample of five GNT files were reviewed and four GNT files (0000242291QT7BB, 0000495741QT6AA, 0000696991QT7DB, 0001290220PGA5A) were confirmed as being sent with incorrect requested switch dates.
- Request reason code UA – Unauthorised Switch; one GNT file was reviewed and it was confirmed as being accurate.

- Request reason code WP – Wrong Property; a sample of seven GNT files were reviewed, and two GNT files (ICPs 0000755291QT6E9, 0000145321QT4D9) were confirmed as being sent for an incorrect address where the process is where similar addresses are present on the gas registry that metering information is requested from the customer to verify the correct address. This process was not performed for these two ICPs.

<table>
<tr><td colspan="4">Auditor comment</td></tr>
<tr><td>Non-compliance</td><td colspan="3">Description</td></tr>
<tr><td>Report section: 9.1
Rule: 66.1, 67.1.2, 67.1.3
From: 31 August 2022
To: 3 July 2023</td><td>Audit history: Yes
Controls: Acceptable
Impact: Minor</td><td colspan="2">Genesis Energy (GENG)
Five of a sample of 42 GNTs were not issued within two business days of entering into a contract to supply gas.
A NTD breach was recorded for non TOU ICP 0004224678NGCE4, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch.
Two NTD breaches were recorded for TOU ICP 0001028461NG515, because the requested switch date was prior to the GNT issue date for a GNT that was submitted for a standard switch.
One GNT (ICP 0000509601QT523) was confirmed as being sent with the incorrect switch type.
Two GNT’s (ICPs 0002289861QTB84 and 1000592961PGB09 were confirmed as being sent with incorrect requested switch dates.
Frank Energy (GEOL)
Two of a sample of 28 GNTs were not issued within two business days of entering into a contract to supply gas.
One GNT file (ICP 0000284341QT28D) was confirmed that the incorrect switch type was selected by Frank Energy.
Four GNT files (0000242291QT7BB, 0000495741QT6AA, 0000696991QT7DB, 0001290220PGA5A) were confirmed as being sent with incorrect requested switch dates.</td></tr>
<tr><td>Remedial action rating</td><td colspan="2">Remedial timeframe</td><td>Remedial comment</td></tr>
<tr><td>In progress</td><td colspan="2">Ongoing</td><td>See below</td></tr>
<tr><td colspan="4">Audited party comment</td></tr>
<tr><td>The circumstances of the matters outlined in the breach notice.</td><td colspan="3">Genesis Energy (GENG)
A delay from 3rd party contractors resulted in a delay in completing the sign up in our system, human errors have also contributed to the breaches outlined above.
0002289861QTB84 – The customer requested to change the NT date after NT was initiated
Frank Energy (GEOL)
Human error contributed to the breaches outlined above.</td></tr>
</table>

	0000495741QT6AA & 0001290220PGA5A – Customer requested to change NT date after the NTs had been initiated. 0000696991QT7DB – alt retailer requested we change NT date due to their contract end date
Whether or not the participant admits or disputes that it is in breach.	Genesis accepts this breach
Estimate of the impact of the breaches (where admitted).	Minor
What steps or processes were in place to prevent the breaches?	Ongoing training and feedback for human error
What steps have been taken to prevent recurrence?	Ongoing training and feedback for human error Currently our billing platform allows for incorrect dates to be selected. We will review this as part of our billing platform upgrade. In relation to GEND switching Genesis currently process this directly into the registry, automation will be established as part on our billing platform upgrade. Genesis will continue to work with 3rd parties to ensure we are receiving the sign-up data in a timely manner.

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:

1. a gas acceptance notice (GAN), or
2. a gas transfer notice (GTN), or
3. a gas switching withdrawal notice (GNW).

GENESIS ENERGY

Where Genesis receive the GNT (i.e. are the losing retailer) the GNT is processed automatically if it meets the criteria of having a current customer. The GAN is completed automatically and does not stipulate a date unless one is provided in the gaining retailers GNT file, in which case the given date is used. Any errors appear on a work list and are manually worked by the Customer Service Representative team (CSR team).

The switch breach report identified two GEND ICPs (0003067547NGF4C – one day overdue, 1000540573PG23C – three days overdue) where a GAN file was sent late.

Auditor comment			
Non-compliance	Description		
Report section: 9.2 Rule: 69.1 From: 25 July 2022 To: 26 January 2023	Audit history: No Controls: Effective Impact: Minor	The switch breach report identified two GEND ICPs (0003067547NGF4C – one day overdue, 1000540573PG23C – three days overdue) where a GAN file was sent late.	
Remedial action rating	Remedial timeframe	Remedial comment	
In progress	October 2024	Further training has been provided to the team in relation to the importance of working the switch breach report. We will also be investigating the possibility of automating this reporting.	
Audited party comment			
The circumstances of the matters outlined in the breach notice.	The breaches were due to workflow management and the breach report not being worked in a timely manner		
Whether or not the participant admits or disputes that it is in breach.	Genesis Accepts this breach		
Estimate of the impact of the breaches (where admitted).	Minor		
What steps or processes were in place to prevent the breaches?	Processes were in place to run the switch breach report daily to ensure the above breaches did not occur		
What steps have been taken to prevent recurrence?	Further training has been provided to the team in relation to the importance of working the switch breach report. We will also be investigating the possibility of automating this reporting for GEND.		

FRANK ENERGY

The process for providing a response to a GNT file is the same as Genesis Energy.

The switch breach report confirmed compliance with this requirement.

9.3. Gas acceptance notice (rule 70)

A sample of GAN files were reviewed to confirm the accuracy of the content and that the expected switch date was not later than 10 business days as stipulated in Rule 70.2.2, and where the gas switching notice included a requested switch date that complied with rule 67.3 or 67.3A, the responsible retailer must use the requested switch date as the switch date and provide switch readings applicable to that date in Rule 72.2

GENESIS ENERGY

A sample of 24 GAN files were reviewed to confirm the accuracy of the content and found:

- 22 GAN files had a correct acceptance code provided.
- Two ICPs (1000502714PG2D4, 1000606216PGD60) had an acceptance code of PD – Premise Disconnected applied when the ICP was active due to a data accuracy issue in Gentrack.

Recommendation	Audited party comment
Increase frequency of monitoring status values between Gentrack and the registry to ensure continual alignment to ensure GAN response codes are accurate.	**Response:** Genesis agrees with this recommendation **Comments:** We will review our current processes and increase the frequency of registry reporting to improve timeliness and accuracy

The expected switch date for all GAN files provided was confirmed as not being later than 10 business days as stipulated in Rule 70.2.2.

FRANK ENERGY

A sample of 29 GAN files were reviewed to confirm the accuracy of the content and found:

- 24 GAN files had a correct acceptance code provided.
- Four ICPs (1002124101QT14E, 1001149255QT8FC, 0002020771QTCB6, 0002287011QT614) had an acceptance code of OC – Occupied due to the dummy account "the New Occupier' being set up to ensure any meter readings received for the ICP was correctly validated and used in the submission process. However, these ICPs were vacant.
- One ICP (0000282971QTABF) had an acceptance code of MU - No Meter in place when there was a meter present on site and recorded on the gas registry.

Recommendation	Audited party comment
Increase frequency of monitoring status values between Gentrack and the registry to ensure continual alignment to ensure GAN response codes are accurate.	**Response:** Genesis agrees with this recommendation **Comments:** The frequency of our current reconciliation between Gentrack and the registry will be reviewed and increased accordingly

The expected switch date for all GAN files provided was confirmed as not being later than 10 business days as stipulated in Rule 70.2.2.

Auditor comment		
Non-compliance	Description	
Report section: 9.3 Rule: 70.3 From: 1 January 2020 To: 31 July 2023	Audit history: No Controls: Effective Impact: Minor	**Genesis Energy (GENG)** Two ICPs (1000502714PG2D4, 1000606216PGD60) had an acceptance code of PD – Premise Disconnected applied when the ICP was active due to a data accuracy issue in Gentrack. **Frank Energy (GEOL)** Four ICPs (1002124101QT14E, 1001149255QT8FC, 0002020771QTCB6, 0002287011QT614) had an acceptance code of OC – Occupied due to the dummy account "the New Occupier' being set up to ensure any meter readings received for the ICP was correctly validated and used in the submission process. However, these ICPs were vacant. One ICP (0000282971QTABF) had an acceptance code of MU - No Meter in place when there was a meter present on site and recorded on the gas registry.

Remedial action rating	Remedial timeframe	Remedial comment
In progress	September 2024	Genesis will increase the frequency that the Gentrack /gas registry alignment reporting is run

Audited party comment	
The circumstances of the matters outlined in the breach notice.	**Genesis Energy (GENG)** 1000502714PG2D4 was due to a delay in the status being updated after a reconnection, and a switch request was received prior to the status being updated. 1000606216PGD60 was due to a system issue. Genesis has previously held this ICP and when it had previously switched it was at a disconnected status. We regained the site when reconnected but as the ICP was disconnected when we previously held it this status remained. **Frank Energy (GEOL)** Due to system limitations when there is an 'Occupier' our automated system defaults to 'OC' however sites are vacant. This will be addressed as part of our billing platform upgrade. Feedback has been passed on to our metering team as ICP 0000282971QTABF was identified in the meter mismatch report as no metering in our system however metering was loaded in the registry.
Whether or not the participant admits or disputes that it is in breach.	Genesis Accepts this breach

Estimate of the impact of the breaches (where admitted).	Minor
What steps or processes were in place to prevent the breaches?	Standard operating procedures and Training. Control reports are in place to pick up incorrect status differences between Gentrack and the gas registry
What steps have been taken to prevent recurrence?	Genesis will increase the frequency that the Gentrack /gas registry alignment reporting is run. Systems issues impacting Switching compliance will be addressed as part of our billing platform upgrade

9.4. Gas transfer notice (rule 72)

GENESIS ENBERGY non TOU (GENG)

When a GTN is received, the information loads automatically into Gentrack. Any errors are worked by the CSR team but there are not many. Where GENG is the losing retailer, the GTN information is collated and sent by the switching team.

The content of a sample of 22 non TOU GTN files were reviewed to confirm accuracy and found:

- 19 were confirmed as accurate.
- Three ICPs (0000236516QTC00, 0000011895GN949, 0000545571QT368) had incorrect date of last read dates applied where the date of the move out estimate read was applied as the last actual read date. For ICPs 0000011895GN949and 0000545571QT368, the read type provided in the GTN file were also incorrectly recorded as actual.

I checked the records for five ICPs where the annual consumption was zero. In all cases, zero was correct because the ICPs were either vacant, had a very short switch in period, or genuinely had zero consumption.

The switch breach detail report identified one breach (NTD) relating to ICP 0004224678NGCE4 where the switch date (28 June 2023) did not reflect the expected switch date provided by GENG in the gas acceptance notice (23 June 2023).

GENESIS ENERGY TOU (GEND)

The TOU switching process is managed manually by a specialist team.

The content of a sample of 11 TOU GTN files were reviewed to confirm accuracy and found:

- Nine were confirmed as accurate.
- Two ICPs (0004228390NGACF, 0003067547NGF4C had incorrect date of last read dates that recorded the switch transfer date as the last read date rather than the last day of supply.

FRANK ENERGY (GEOL)

The process for managing GTN files is the same as for Genesis Energy non TOU process.

The content of a sample of 24 GTN files were reviewed to confirm accuracy and found:

- 20 were confirmed as accurate.
- Three ICPs (1002049232QT561, 0001410865QTB46, 0000022998GNCDA) had incorrect date of last read applied where the date of the move out estimate read was applied as the last actual read date. For ICP 0000022998GNCDA, the read type provided in the GTN file was also incorrectly recorded as actual.

- For ICP 0001018140NG02C, the annualised consumption calculation included an initial switch gain read that had been replaced by the switch read negotiation process prior to Genesis Energy receiving a GNT file for the ICP. This resulted in an incorrect negative annualised consumption calculation being applied and recorded in the resulting GTN as part of the switch loss.

The switch breach detail report identified one breach (TND) relating to ICP 1001285241NG619 where the switch date (11 June 2023) was prior to the proposed switch date provided by the gaining retailer in the gas switching notice (12 June 2023). The cause of this error was identified as human error.

<table>
<tr><td>Non-compliance</td><td colspan="3">Description</td></tr>
<tr><td>Report section: 9.4
Rule: 72.2
From: 12 June 2023
To: 12 June 2023</td><td>Audit history: No
Controls: Acceptable
Impact: Insignificant</td><td colspan="2">Genesis Energy TOU (GEND)
Three ICPs (0000236516QTC00, 0000011895GN949, 0000545571QT368) had incorrect date of last read dates applied where the date of the move out estimate read was applied as the last actual read date.
Frank Energy (GEOL)
The switch breach detail report identified one breach (TND) relating to ICP 1001285241NG619 where the switch date 12 June 2023 was prior to the proposed switch date provided by the gaining retailer in the gas switching notice 12 June 2023.</td></tr>
<tr><td colspan="2">Remedial action rating</td><td>Remedial timeframe</td><td>Remedial comment</td></tr>
<tr><td colspan="2">In progress</td><td>Ongoing</td><td>Staff refresher training has been provided and the systems issue that allows for a date prior to the NT to be selected will be resolved as part of our billing platform upgrade</td></tr>
<tr><td colspan="4">Audited party comment</td></tr>
<tr><td colspan="2">The circumstances of the matters outlined in the breach notice.</td><td colspan="2">Genesis Energy TOU (GEND)
The issues relating to incorrect last read type were due to a systems issue that results in MF (Manual Final) reads being flagged as actual instead of estimates.
The issues with the difference between expected and actual switch date was due to a delay in the switching process.
The ICPs that has the last read date recorded as the switch transfer date rather than the previous day were due to human error.
Frank Energy (GEOL)
The ALT retailer requested this site for the 12th of June and Genesis confirmed this date. However, due to human error the ICP was released from the 11th of June. The employee in question was new to the gas process.</td></tr>
<tr><td colspan="2">Whether or not the participant admits or disputes that it is in breach.</td><td colspan="2">Genesis accepts this breach</td></tr>
</table>

Estimate of the impact of the breaches (where admitted).	Insignificant
What steps or processes were in place to prevent the breaches?	Standard operating procedures and employee training
What steps have been taken to prevent recurrence?	Training has been provided to the team regarding the Gas process. We have also identified a systems issue that allows for a date to be selected that is prior to the NT date. This will be addressed as art of our billing platform upgrade

9.5. Accuracy of switch readings (rule 74)

The accuracy of switch readings was examined as a part of the activities detailed in section 9.3 above. There are no additional issues to report in this section.

9.6. Gas switching withdrawal (rule 74A, 75, 76, 78)

Analysis was undertaken of GNWs (switching withdrawal notices) to identify the number within each reason category. This was done as both the recipient of the GNW and as the initiator of the GNW. The results are shown in the tables below, where I have left in the 2020 results to enable comparison with the 2023 results.

GENESIS ENERGY non TOU (GENG)

GNW files sent and received 2020.

GNW Files	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
GNW Sent (old)	4,132	64		104	43	146	542	5,031	26.11%
GNW Sent (new)	740	137		35	3	216	47	1,178	6.11%
GNW Received (old)	2,337	21		11	43	89	220	2,721	14.12%
GNW Received (new)	396	113		27	3	127	31	697	3.62%

GNW files sent and received 2023.

GNW Files	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
GNW Sent (old)	806	92		156		250	1618	2,922	15.17%

GNW Sent (new)	818	70		30		310	60	1,288	6.69%
GNW Received (old)	672	84	2	60	280	422	810	2,330	12.09%
GNW Received (new)	1,312	336		88	2	430	114	2,282	11.84%

There has been an increase in GNW requests for WS – wrong switch type since 2020. This appears to be due to customers being able to sign up online or via 3rd party agents and the information provided by the customer regarding whether they are moving into a property is later found to be incorrect. Each switch withdrawal and reissue of a revised GNT has a component of time associated with it for both the gaining and losing retailers and a recommendation is made to review the online sign up process to improve the accuracy of the information provided by customers to enable accurate switch types to be determined.

Recommendation	Audited party comment
Review the 3rd party and online sign up processes to improve the accuracy of the information provided by customers to enable accurate switch types to be determined.	**Response:** Genesis agrees with this recommendation **Comments:** Genesis will review the current sign-up process and look for improvements that will increase the accuracy of the information obtained

I checked 40 examples including all GNW codes where Genesis Energy was the new retailer and where Genesis Energy was the old retailer and found:

- For 37 GNW files, the correct codes were used, and Genesis Energy had sufficient information to support the withdrawal.
- For three GNW files (ICPs 0002289861QTB84, 0000101011QTD37, 0000266701QT214) an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied.

I checked a sample of 10 ICPs where GNW files had been sent by other retailers and had been rejected by GENG. In all cases, GENG had sufficient information to support the rejection. 4.0% (9 of 224) of GNW files received were rejected.

13 of 181 GNW files sent by GENG (7.2%) were rejected. 10 were reviewed and found that there were valid reasons at the time of sending files.

GENESIS ENERGY TOU (GEND)

GNW files sent and received 2020.

GNW Files	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
GNW Sent (old)	2	0	0	0	0	0	0	2	20.00%
GNW Sent (new)	2	0	0	0	0	0	0	2	20.00%
GNW Received (old)	0	1	0	0	0	0	0	1	10.00%
GNW Received (new)	0	0	0	0	0	0	0	0	0.00%

GNW files sent and received 2023.

GNW Files	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
GNW Sent (old)	-	-	-	-	-	-	-	-	-%
GNW Sent (new)	-	-	-	-	-	-	-	-	-%
GNW Received (old)	2		1				3	6	11.1%
GNW Received (new)	-	-	-	6	-	-	-	6	11.1%

I checked 12 examples including all GNW codes where Genesis Energy was the new retailer and where Genesis Energy was the old retailer and found that in all cases, the correct codes were used, and Genesis Energy had sufficient information to support the withdrawal.

FRANK ENERGY

GNW files sent and received 2020.

GNW Files	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
GNW Sent (old)	148	5		10		14	95	272	7.2%

GNW Sent (new)	103	13		12		59	26	213	5.6%
GNW Received (old)	135	6	1	3	10	36	109	165	4.3%
GNW Received (new)	86	26		2		30	16	160	4.2%

GNW files sent and received 2023.

GNW Files	CR	DF	IN	MI	UA	WP	WS	Total	% of GNTs
GNW Sent (old)	20	5		13		17	184	239	2.28%
GNW Sent (new)	90	13		2		39	45	189	1.80%
GNW Received (old)	63	22		12	23	45	138	303	2.89%
GNW Received (new)	140	30		8	4	42	26	250	2.38%

There has been an increase in GNW requests for WS – wrong switch type since 2020. This appears to be due to customers being able to sign up online or vis 3rd party agents and the information provided by the customer regarding whether they are moving into a property is later found to be incorrect.

I checked 40 examples including all GNW codes where Frank Energy was the new retailer and where Frank Energy was the old retailer and found.

- For 29 GNW files, the correct codes were used, and Frank Energy had sufficient information to support the withdrawal.
- For nine GNW files[1] an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied.
- For two GNW files[2] an incorrect request code of WP – Wrong Property was applied where a customer had requested to cancel the switch and a correct reason request code of CR – Customer Request should have been applied.

I checked a sample of 10 ICPs where GNW files had been sent by other retailers and had been rejected by Frank Energy. In all cases, Frank Energy had sufficient information to support the rejection. 12.3% (67 of 543) of GNW files received were rejected.

[1] ICPs 0000284341QT28D, 0000696991QT7DB, 0001290220PGA5A, 1001248820QT7F0, 0000749701QTF6A, 0000242291QT7BB, 0000284341QT28D, 0000495741QT6AA, 0000696991QT7DB.
[2] ICPs 1002074092QTC75, 1002074092QTC75.

33 of 438 GNW files sent by Frank Energy (7.5%) were rejected. 10 were reviewed and found that in all cases, the correct codes were used, and Frank Energy had sufficient information to support the withdrawal.

<table>
<tr><td colspan="4">Auditor comment</td></tr>
<tr><td>Non-compliance</td><td colspan="3">Description</td></tr>
<tr><td>Report section: 9.6
Rule: 76.2
From: 12 January 2022
To: 12 June 2023</td><td>Audit history: No
Controls: Effective
Impact: Minor</td><td colspan="2">Genesis Energy (GENG)
For three GNW files an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied.
Frank Energy (GEOL)
For nine GNW files an incorrect request reason code of DF – Date failed was applied where a customer had requested a change in switch date where a correct reason request code of CR – Customer Request should have been applied.
For two GNW files an incorrect request code of WP – Wrong Property was applied where a customer had requested to cancel the switch and a correct reason request code of CR – Customer Request should have been applied.</td></tr>
<tr><td colspan="2">Remedial action rating</td><td>Remedial timeframe</td><td>Remedial comment</td></tr>
<tr><td colspan="2">In progress</td><td>March 2024</td><td>Refresher training has been provided to all the Switching Team</td></tr>
<tr><td colspan="4">Audited party comment</td></tr>
<tr><td colspan="2">The circumstances of the matters outlined in the breach notice.</td><td colspan="2">The main reason for these breaches was human error resulting in the incorrect reason code being selected</td></tr>
<tr><td colspan="2">Whether or not the participant admits or disputes that it is in breach.</td><td colspan="2">Genesis accepts this breach</td></tr>
<tr><td colspan="2">Estimate of the impact of the breaches (where admitted).</td><td colspan="2">Minor</td></tr>
<tr><td colspan="2">What steps or processes were in place to prevent the breaches?</td><td colspan="2">There is standard operating procedure in relation to reason codes and when they should be used</td></tr>
<tr><td colspan="2">What steps have been taken to prevent recurrence?</td><td colspan="2">Refresher training has been provided to all the Switching Team</td></tr>
</table>

9.7. Switch reading negotiation (rule 79, 81)

Where an actual or customer read received after an ICP switches in that is either lower than the switch event reading, or significantly higher than the switch event reading then a meter reading exception is created and investigated. Genesis Energy requests a check read to be obtained and from the two available actual reads a decision is made whether to request a switch read negotiation (GNC) via the registry.

GENESIS ENERGY non TOU (GENG)

It is a manual process to create GNC files and a template is used to calculate, from the obtained actual reads and read dates plus the switch transfer date, a suitable alternative switch event reading.

Analysis was undertaken of GNCs (switch read negotiation) to identify the number within each reason category. This was done as both the recipient of the GNC and as the initiator of the GNC. The results are shown in the tables below.

GNC sent by GENG.

	Count	%
GNT files	19,266	
GNC requests	618	
Ratio GNC to GNT		3.21%
GNC Accepted	517	83.66%
GNC Rejected	102	16.50%

GNC received by GENG.

	Count	%
GTN files	21,771	
GNC requests	1,126	
Ratio GNC to GNT		5.17%
GNC Accepted	908	80.64%
GNC Rejected	216	19.18%

There were 1,126 GNCs sent by other retailers, indicating inaccurate switch reads by Genesis Energy.

There were 618 GAC files sent by Genesis Energy where they rejected the other retailer's switch read. There were 102 ICPs where the other retailer rejected Genesis Energy's proposed read.

A sample of 30 were reviewed and all GNC requests were found to be substantiated.

GENESIS ENERGY TOU (GEND)

There were no sent or received switch reading negotiations for GEND during the audit period.

FRANK ENERGY (GEOL)

It is a manual process to create GNC files and a template is used to calculate, from the obtained actual reads and read dates plus the switch transfer date, a suitable alternative switch event reading.

Analysis was undertaken of GNCs (switch read negotiation) to identify the number within each reason category. This was done as both the recipient of the GNC and as the initiator of the GNC. The results are shown in the tables below.

GNC sent by GEOL.

	Count	%

GNT files	5,330	
GNC requests	188	
Ratio GNC to GNT		3.5%
GNC Accepted	164	87.2%
GNC Rejected	24	12.8%

GNC received by GEOL.

	Count	%
GTN files	5,163	
GNC requests	286	
Ratio GNC to GNT		5.5%
GNC Accepted	217	75.9%
GNC Rejected	68	23. 8%

There were 286 GNCs sent by other retailers, indicating inaccurate switch reads by Frank Energy.

There were 68 GAC files sent by Genesis Energy where they rejected the other retailer's switch read. There were 24 ICPs where the other retailer rejected Genesis Energy's proposed read.

A sample of 21 and all GNC requests were found to be substantiated.

10. Bypass of distributor (rule 82)

None of the Genesis participant codes are retailers on a bypass network so they have no responsibilities under **Rule 82**.

11. Recommendations

GENESIS ENERGY

Seven recommendations were made during this audit, as follows:

- Once a new connection has been confirmed as cancelled, follow up with the distributor to ensure the ICP is decommissioned on the registry so that the RSREADY report is an accurate representation of all current new connection ICPs.
- Review the new connection process of back dating the initial retail event to align with the ICP creation date to ensure the ICP is claimed from the date Genesis Energy has entered into an agreement with a customer for the ICP.
- Ensure all ex EGAS ICPS that have not been decommissioned are set up in Gentrack to enable monitoring of registry information.
- Ensure allocation group exception report is run and reviewed on a regular cycle.
- Review process to update the allocation group value for an ICP to ensure that the meter reading frequency requirements have been confirmed as being updated by the meter reading agent prior to updating the allocation group on the registry.
- Review allocation group exception report selection criteria to identify why some ICPs appear to be missing from this report.
- Increase frequency of monitoring status values between Gentrack and the registry to ensure continual alignment to ensure GAN response codes are accurate.

FRANK ENERGY

Two recommendations were made during this audit, as follows:

Refresh the participant registration information to ensure there is sufficient and current contact information relating to the respective teams responsible for registry interactions.

- Review the 3rd party and online sign up processes to improve the accuracy of the information provided by customers to enable accurate switch types to be determined.
- Increase frequency of monitoring status values between Gentrack and the registry to ensure continual alignment to ensure GAN response codes are accurate.

Appendix 1 – Control Rating Definitions [1]

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.

[1] All relevant systems and processes in place

Appendix 2 – Impact Rating Definitions[1]

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.

[1] These ratings are indicative and will be used as a guide only, to aid the Market Administrator's assessment of alleged breaches.

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 – Genesis Energy Comments

Genesis Energy would like to thank Crosshaven Consulting for the time and effort they have put into competing this audit, and the recommendations they have made on the back of this,

We are fully committed to further enhancing our controls and improving our compliance and will address the remaining recommendations from this audit as detailed in the relevant non compliances above.

We are in the process of upgrading our billing platform / CRM upgrade and making sure that this helps to resolve compliance issues that stem from current system constraints is a priority. We expect this to bring significant compliance benefits.