



GAS REGISTRY AND SWITCHING PERFORMANCE AUDIT GENESIS ENERGY LTD

Date of audit: 13 to 17 July 2020

Report completed: 22 October 2020

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

Auditor Julie Langford

Executive Summary

Under the Gas (Switching Arrangements) Rules 2008 (the rules) the Gas Industry Company commissioned Langford Consulting to undertake a performance audit of Genesis Energy Ltd. The scope of the audit included 3 participants: Genesis Energy TOU (GEND); Genesis Energy mass market (GENG) and Energy Online (GEOL).

The purpose of the audit is to:

- assess compliance with the rules
- assess the systems and processes put in place to enable compliance with the rules

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>).

The summary of report findings shows that the Genesis control environment, for the fifteen areas evaluated, is “effective” for eleven areas and “adequate” for three areas. The area of use of system agreements was found to be inadequate as Genesis do not have any current agreements.

Nine breach allegations are made in relation to the non-compliant areas and are summarised in the following table. The following observation was also made:

OBSERVATION If the issue relating to Genesis not having current use of system agreements with distributors is a wider industry issue there could be value in GIC involvement to help resolve this.

Summary of breach allegations

Section	Summary of issue	Rules potentially breached
7	GENG GEOL and GEND initiate switches without a current use of system agreement with the relevant distribution system owner	r65.2.3
8	<p>GENG was late entering registry values for 34 new ICPs out of a sample of 64 ICPs drawn from the maintenance breach history report</p> <p>GEOL was late entering registry values for 11 new ICPs out of a sample of 31 ICPs drawn from the maintenance breach history report</p>	r54.1
11.1	<p>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.</p> <p>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.</p>	r66.1
11.3	GEND did not comply with the requirement to respond to a gas switching notice within 2 business days for 2 ICPs.	r69.1
11.4	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.	r72.1.3 and 72.1.8

Summary of report findings

Issue	Section	Control Rating (refer to appendix 1 for definitions)	Compliance Rating	Comments
Participant registration information	3	Effective	Compliant	This had been rectified since the last audit
Obligation to act reasonably	4	Effective	Compliant	No unreasonable behaviour was observed
Obligation to use registry software competently	5	Effective	Compliant	Software was being used competently
ICP identifier on invoice	6	Effective	Compliant	This was observed
Use of system agreements	7	Not adequate	Not compliant	No current agreements
Uplift of READY ICP	8	Adequate	Not compliant	Sampling found examples of late entering into the registry of values for new ICPs
Maintenance of ICP information in registry	9	Adequate	Compliant	Analysis shows that a significant portion of GEOL and GENG status changes take more than 20 business days to update
Resolving discrepancies	10	Effective	Compliant	Alignment with the registry was good
Initiation of consumer switch/switching notice	11.1	Adequate	Not compliant	Sampling found examples of switches initiated more than 2 business days after entering into a gas sales contract for GENG and GEOL
Response to a gas switching notice	11.2	Effective	Compliant	Given the number of switches done by Genesis the number of automatic alleged breaches is modest
Gas acceptance notice	11.3	Effective	Not compliant	GEND were late for 2 ICPs Controls for GEOL and GENG were however effective
Gas transfer notice	11.4	Effective	Not compliant	There was a systematic problem with the no of dials for GEND
Accuracy of switch readings	11.5	Effective	Compliant	No issues were identified
Gas switching withdrawal	11.6	Effective	Compliant	No issues were identified
Switch reading negotiation	11.7	Effective	Compliant	No issues were identified

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1. Introduction

Under the Gas (Switching Arrangements) Rules 2008 (the rules) the Gas Industry Company (GIC) commissioned Langford Consulting to undertake a performance audit of Genesis Energy Ltd. The audit was commissioned under rule 88 and was conducted within terms of reference prepared by GIC. The scope of the audit included 3 participants: Genesis Energy (TOU); Genesis Energy (mass market) and Energy Online (GEOL).

The engagement commenced on 16 January 2020 and involved a site visit to the retailer between 13 to 17 July 2020. The audit date had been planned for March but was unable to occur due to Covid-19 alert level protocols.

The purpose of the audit is to:

- assess compliance with the rules
- assess the systems and processes put in place to enable compliance with the rules

The audit was undertaken in parallel with a performance report under the Gas (Downstream Reconciliation) Rules 2008 which is reported on separately.

In preparing the report, the auditor used the processes set out in the guideline note issued on 1 June 2013: *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>).

2. General Compliance

Genesis are currently using v3.8 of Gentrack, which is nearing the end of its lifespan. Options are being considered for its upgrade or replacement, but meanwhile there would be a lower level of change or updates to the system. GEOL and GENG processes have now been fully aligned, which has helped with reconciliation issues, and has also improved the management of event-based processes. GEND customers are managed separately, mostly outside of Gentrack.

Genesis commented that their first advanced metering pilot was beginning shortly.

2.1 Summary of Previous Audits

Genesis underwent its first switching audit in September 2016. The audit report listed a number of alleged breaches including:

- Physical address information being out of date on the registry (all participant codes)
- Status updates for new connections not being done within 2 business days (all participant codes)
- Status event updates exceeding 30 business days (GEOL; GENG)
- Notification of GNTs exceeding 2 business days (GENG)
- Problems with last actual read dates on GTNs (GEOL)
- GTN switch reading type incorrect (GEOL)
- Incorrect reason codes on GNWs (GEOL; GENG)
- Rejection of a valid NT (GENG)

There was a recommendation that Genesis import meter location information into their systems for use by meter readers and to pass on to subsequent retailers, which has been done.

Energy Online underwent a major system change audit in September 2018 when it switched from using Orion to Gentrack. The following were issues recorded in relation to the switching rules:

- Incorrect physical address on the registry
- Incorrect allocation groups
- Vacant ICPs sent in the GAN files with the OC code which indicates the ICP is occupied when it is not.

2.2 Switch Breach Report

Since the last audit, the three Genesis retailers have had 17 alleged breaches reported to the market administrator, all reported by Jade and relating to switch transactions not received by their due date.

GENG has had 8 alleged breaches

GEOL has had 5 alleged breaches

GEND has had 4 alleged breaches

2.3 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.

3. Participant registration information (rules 7 and 10)

The participant registration information was reviewed and confirmed as current. It was last updated in November 2019, for all three participant codes. This was a process improvement arising from the last audit.

4. Obligation to act reasonably (rule 34)

No examples of Genesis acting unreasonably were found.

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

No examples of Genesis using registry software incompetently were found.

6. ICP identifier on invoice (rule 36)

An example of an invoice was viewed for GEOL, GEND and GENG. All were found to show the ICP.

7. Use of system agreements (rule 65.2.3)

The rules require that before initiating a switch a retailer must be party to a valid subsisting agreement with the owner of the distribution system to which the consumer installation is connected. As a part of this audit Genesis were asked to supply copies of their current use of system agreements with the distribution system owners. Although Genesis were able to provide some historical agreements none were current.

- ALLEGED BREACH r 65.2.3 GENG initiate switches without a current use of system agreement with the relevant distribution system owner
- ALLEGED BREACH r 65.2.3 GEOL initiate switches without a current use of system agreement with the relevant distribution system owner
- ALLEGED BREACH r 65.2.3 GEND initiate switches without a current use of system agreement with the relevant distribution system owner

OBSERVATION If the issue relating to Genesis not having current use of system agreements with distributors is a wider industry issue there could be value in GIC involvement to help resolve this.

8. Uplift of READY ICP (rule 54)

This audit was completed alongside another audit under the Gas (Downstream Reconciliation) Rules 2008 which reports on the analysis of the new connections process with respect to those rules and the general new connections process. This is therefore not repeated here.

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.

The Maintenance Breach History Report (RET breaches) was examined for input dates in 2019 where the initial registry update was later than two business days.

- For GEOL there were 130 ICPs
- For GEND there were 2 ICPs
- For GENG there were 3,067 ICPs

But this on its own is not sufficient to establish a breach as it is necessary to also consider the date the contract was entered into which is not recorded on the registry. Genesis were asked to supply the dates that the contracts were entered into for a sample of these possible breaches.

The following alleged breaches arose:

- ALLEGED BREACH rule 54.1 GENG was late entering registry values for 34 new ICPs out of a sample of 64 ICPs drawn from the maintenance breach history report

- ALLEGED BREACH rule 54.1 GEOL was late entering registry values for 11 new ICPs out of a sample of 31 ICPs drawn from the maintenance breach history report

See appendix 2 for detail regarding these alleged breaches

There were no alleged breaches for GEND.

9. 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 (r58) 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” (r61). 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 20 business days

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 2019 to check the timeliness of all status event changes. The table below shows the results of this examination.

GENG

Status Updates in 2019	Total ICPs	Update greater than 5 business days	Update greater than 20 business days
ACTC	11,383	4,966	1,584
ACTV	9,150	2,404	878
INACP	375	234	133
INACT	6,627	1,935	358
TOTAL as %		35%	11%

GEND

Status Updates in 2019	Total ICPs	Update greater than 5 business days	Update greater than 20 business days
ACTC	2	1	0
ACTV	Nil		
INACP	1	0	0

INACT	Nil		
TOTAL as %		33%	Nil

GEOL

Status Updates in 2019	Total ICPs	Update greater than 5 business days	Update greater than 20 business days
ACTC	3,116	1,694	697
ACTV	2,737	322	96
INACP	45	27	11
INACT	500	248	65
TOTAL as %		36%	14%

A review of some of the status updates that took longer than 20 business days were done on site to establish the main reasons. The following themes were identified:

- Some of the longest ACTC status changes were the result of backdated switches or 'move ins'.
- Disconnects that subsequently use gas become a backdated status change when they are reconnected
- Some of the latest ACTVs relate to final billing complications e.g. read disputes or reinstated customers.
- Some had detailed notes of complex scenarios and had arisen from the active working of status discrepancy lists. Genesis run a comparison of registry v Gentrack status weekly and have a status validity versus metering report that can be run on an ad hoc basis.
- Slow INACPs can be the result of a distributor request to allow decommissioning which is then backdated to when the meter was removed; there can also be delays in paperwork regarding meter removal
- Slow INACTs can be due to a long gap between an ICP being made READY and a contract being entered into.

An analysis of status codes was done and is shown in the tables below. The ICP status codes were all paired with legitimate connections status codes.

GENG

	No of status events	Paired with
ACTC	11,383	GAS/GTD
ACTV	9,150	GAS
INACP	375	GPC/GPM
INACT	6,627	GMM/GNC/GNM/GSC/GSM/GSU/GVC/GVM

GEND

	No of status events	Paired with
ACTC	2	GAS
ACTV	Nil	
INACP	1	GPM
INACT	Nil	

GEOL

	No of status events	Paired with
ACTC	3,116	GAS/GTD
ACTV	2,737	GAS
INACP	45	GPC/GPM
INACT	500	GMM/GNC/GNM/GSC/GVC/GVM

10. Resolving discrepancies (rule 62.1)

During the audit, checks between the registry and Genesis' systems showed good alignment. Most registry fields are automatically aligned between the two systems.

There was evidence of Genesis actively working status discrepancies (see above).

11. Switching

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

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. (r66.1)

Where Genesis are the gaining retailer the CSR does the sign up which includes going to the registry to get the relevant registry information for new connections and switching. This creates the GNT, with any errors arising being managed by the switching team.

A sample of GNTs initiated by Genesis in 2019 for each of the three retailer codes were reviewed for compliance with the 2-business day rule. The following alleged breaches were found:

- ALLEGED BREACH r 66.1 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.
- ALLEGED BREACH r 66.1 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.

See appendix 2 for further detail.

There were no alleged breaches found for GEND in the sample reviewed.

All GNTs for switch type S and SM were reviewed for compliance with r67.3 and 67.3A to check they were not sent more than 10 business days prior to the switch date. No breaches were found.

11.2 Response to a gas switching notice (rules 69 to 75)

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 done automatically and does not stipulate a date unless one is given by the counterparty, in which case the given date is used. Any errors appear on a work list and are manually worked by the Customer Service Representative (CSR).

The breach report for Genesis retailers was reviewed for alleged breaches. Since the last audit, the three Genesis retailers have had 17 alleged breaches reported to the market administrator, all reported by Jade for switch transactions. They included problems with expected switch dates; late response to a switching withdrawal notice; late response to a gas switching notice.

GENG has had 8 alleged breaches

GEOL has had 5 alleged breaches

GEND has had 4 alleged breaches

Given the number of switches done by Genesis this is considered a modest number of breaches.

11.3 Gas acceptance notice (rule 70)

A sample of GANs (acceptance notices) initiated by Genesis were reviewed for compliance with the 2-business day rule in r69.1 and the switch date rules in r70.2 and r72.2.

- ALLEGED BREACH (rule 69.1) GEND did not comply with the requirement to respond to a gas switching notice within 2 business days for 2 ICPs.

See appendix 2 for further detail.

GEOL – no breaches found

GENG – no breaches found

11.4 Gas transfer notice (rule 72)

When Genesis as GENG/GEOL receive a GTN the information loads automatically into Gentrack. Any errors are worked by the CSR team but there are not many. If they are the losing retailer the losing ICP is collated and sent by the switching team.

The GEND process is managed manually by a specialist team.

A sample of GTNs (transfer notices) where Genesis was the responsible retailer were reviewed for compliance with r 72 and r74 for all three retailer codes. The following alleged breaches were found:

OBSERVATIONS

GEND a reading was described as an estimate when it was an actual read.

GEOL a final read from a customer was described as an estimate when it was an actual read.

GENG the annualised consumption estimate was 14, Gentrack suggests 10

GENG a final read from a customer was entered as an estimate when it was an actual read

- ALLEGED BREACH r72.1.8 GEND the number of dials were incorrect for 3 ICPs

The number of dials issue appeared to be a systematic problem with the GEND process as the sample available for review was small, GEND do not complete many GTNs. The process prone to error because it is very manual and staff do not work many examples.

11.5 Accuracy of switch readings (rule 74)

The accuracy of switch readings was examined as a part of the activities detailed in section 11.4 above. There are no additional issues to report in this section.

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

Withdrawals are worked manually by the switching team. They usually originate either from the customer or are derived from an e-mail from the other retailer.

An analysis was undertaken of GNWs (switching withdrawal notices) to identify the number within each reason category. This was done for the audited participant as both the recipient of the GNW and as the initiator of the GNW and where Genesis was the old retailer and the new retailer. The results are shown in the tables below.

GENG as responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	740	6.1%
N	DF	137	1.1%
N	MI	35	0.3%
N	UA	3	0.0%
N	WP	216	1.8%
N	WS	47	0.4%
O	CR	4,132	24.5%
O	DF	64	0.4%
O	MI	104	0.0%
O	UA	43	0.2%
O	WP	146	0.9%
O	WS	542	3.2%

GENG not responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	396	3.3%
N	DF	113	0.9%
N	MI	27	0.2%
N	UA	3	0.0%
N	WP	127	1.0%
N	WS	31	0.3%
O	CR	2,337	13.9%
O	DF	21	0.1%
O	MI	11	0.1%
O	UA	43	0.3%
O	WP	89	0.5%
O	WS	220	1.3%

GEOL as responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	103	2.2%
N	DF	13	0.3%
N	MI	12	0.3%
N	WP	59	1.3%
N	WS	26	0.5%
O	CR	148	3.9%
O	DF	5	0.1%
O	MI	10	0.3%
O	WP	14	0.4%

O	WS	95	2.5%
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GEOL not responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	86	1.2%
N	DF	26	0.6%
N	MI	2	0.0%
N	WP	30	0.7%
N	WS	16	0.4%
O	CR	135	3.5%
O	DF	6	0.2%
O	NI	1	0%
O	MI	3	0.1%
O	UA	10	0.3%
O	WP	36	1.0%
O	WS	109	2.9%

GENG as responsible retailer

Role code	Requesting reason	Number	% of GNTs
O	DF	1	10%

GENG not responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	2	8%
O	CR	2	20%

N = requesting retailer is new retailer, O = requesting retailer is old retailer.

The largest category is 'Customer Request' initiated by GENG when they are the losing retailer. Many of these were the result of the Genesis' WINBACK initiative.

A sample of GNWs were reviewed, with an emphasis on CRs initiated by GENG. Evidence of the reason for the withdrawal was provided for the whole sample with no matters arising.

Request Reason Code	Request Reason Code Description
CR	Customer request
DF	Date failed
IN	Invalid ICP status
MI	Withdrawn on metering issue
UA	Unauthorised switch
WP	Wrong premises
WR	Losing retailer not current retailer
WS	Wrong switch type

11.7 Switch reading negotiation (rule 79, 81)

Read amendments are initiated by the customer or other retailer and are worked by the switching team.

In 2019 there were 412 instances of GENG initiating a GNC and 751 instances of GENG receiving a GNC; 202 examples of GEOL initiating a GNC and 179 examples of GEOL receiving a GNC. There were no examples of GEND receiving or initiating a GNC in 2019.

A sample of the GENG and GEOL GNCs were reviewed with no issues arising.

12. Bypass of distributor (rule 82)

None of the Genesis retailers are retailers on a bypass network so they have no responsibilities under rule 82.

13. Breach Allegations

Section	Summary of issue	Rules potentially breached
7	GENG GEOL and GEND initiate switches without a current use of system agreement with the relevant distribution system owner	r65.2.3
8	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	r54.1
11.1	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.	r66.1
11.3	GEND did not comply with the requirement to respond to a gas switching notice within 2 business days for 2 ICPs.	r69.1
11.4	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.	r72.1.3 and 72.1.8

14. Conclusion

The summary of report findings shows that the Genesis control environment, for the fifteen areas evaluated, is “effective” for eleven areas and “adequate” for three areas. The area of use of system agreements was found to be inadequate, Genesis do not have any current agreements.

Nine breach allegations are made in relation to the non-compliant areas and are summarised in the above table. The following observation was also made:

OBSERVATION If the issue relating to Genesis not having current use of system agreements with distributors is a wider industry issue there could be value in GIC involvement to help resolve this.

Appendix 1 Control Rating Definitions

Control Rating	Definition
Control environment is not adequate	<p>Operating controls designed to mitigate key risks are not applied, or are ineffective, or do not exist.</p> <p>Controls designed to ensure compliance are not applied, or are ineffective, or do not exist.</p> <p>Efficiency/effectiveness of many key processes requires improvement.</p>
Control environment is adequate	<p>Operating controls designed to mitigate key risks are not consistently applied or are not fully effective.</p> <p>Controls designed to ensure compliance are not consistently applied or are not fully effective.</p> <p>Efficiency/effectiveness of some key processes requires improvement.</p>
Control environment is effective	<p>Isolated exceptions identified when testing the effectiveness of operating controls to mitigate key risks.</p> <p>Isolated exceptions identified when testing the effectiveness of controls to ensure compliance.</p> <p>Isolated exceptions where efficiency/effectiveness of key processes could be enhanced.</p>

Appendix 2 Alleged Breach Detail

Uplift of READY ICP

- ALLEGED BREACH rule 54.1 GENG was late entering registry values for 34 new ICPs out of a sample of 64 ICPs drawn from the maintenance breach history report

Input Date	ICP Identifier	Contract date
8/01/2019	1001296827NG86D	10/10/2018
10/01/2019	1000579189PG137	11/02/2018
30/01/2019	1000579950PG229	17/12/2018
8/02/2019	1000574754PGF08	6/01/2018
6/03/2019	1000581012PG19C	13/02/2019
21/03/2019	1000580445PG9FF	20/12/2018
4/04/2019	1002062226QT8EB	4/03/2019
13/05/2019	1000577709PGABB	24/08/2018
10/06/2019	1000582986PG498	5/02/2019
14/06/2019	1000581844PG816	23/05/2019
3/07/2019	1001297150NG853	7/02/2019
4/07/2019	1001297187NG8DB	7/03/2019
4/07/2019	1000582641PG1B2	24/04/2019
8/07/2019	1000582047PG63B	21/03/2019
7/08/2019	1002067917QT778	8/06/2019
28/08/2019	1002039340QT304	10/02/2017
28/08/2019	1001297220NGE0D	4/04/2019
3/09/2019	1000582040PGBF1	20/03/2019
3/09/2019	1000584801PG0DC	8/08/2019
5/09/2019	1002051211QT115	9/03/2019
6/09/2019	1002057231QT980	9/03/2019
2/10/2019	1001297659NG900	8/01/2019
30/10/2019	1000584275PGE81	15/07/2019
31/10/2019	1000576618PG4F7	24/10/2019
5/11/2019	1001297204NG252	15/04/2019
5/11/2019	1001297713NG030	11/04/2019
7/11/2019	1002051773QTB65	30/09/2019
11/11/2019	1002063907QTB55	11/07/2019
11/11/2019	1002072696QTEB9	11/08/2019
12/11/2019	1002071245QT1DA	10/02/2019
10/12/2019	1002072916QT4FC	25/10/2019
13/12/2019	0000032391GN060	10/01/2019
16/12/2019	0000301461QTCB3	12/06/2019
16/12/2019	1000585558PG22D	29/08/2019

- ALLEGED BREACH rule 54.1 GEOL was late entering registry values for 11 new ICPs out of a sample of 31 ICPs drawn from the maintenance breach history report

Input Date	ICP identifier	Contract date
26/03/2019	1002051769QT359	9/11/2018
5/04/2019	1001296893NGBD5	22/01/2019
5/07/2019	0000032357GN600	7/04/2019
3/09/2019	1000581781PGDB9	9/02/2019
4/09/2019	1000570207PG845	9/02/2019
4/09/2019	1000573538PGD81	9/02/2019
5/09/2019	1001297717NG13A	9/04/2019
5/11/2019	1000586306PGD58	11/04/2019
8/11/2019	1001297990NGFB1	11/07/2019
11/11/2019	1000586651PGD9F	11/08/2019
10/12/2019	1001298225NGA22	12/09/2019

Initiation of consumer switch / switching notice

- ALLEGED BREACH r 66.1 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.

ICP	Event Date	Entry Date	Date entered into contract
0000011388GNFB1	15/04/2019	15/04/2019	9/04/2019
0001022341NG902	13/09/2019	19/09/2019	30/08/2019
0001726751QTAE3	3/05/2019	3/05/2019	15/04/2019
0001742241QT193	29/10/2019	29/10/2019	21/10/2019
0001820241QTEF1	22/06/2019	24/06/2019	10/06/2019
0002350771QTABB	28/05/2019	28/05/2019	22/05/2019
0004203372NG6DD	29/01/2019	29/01/2019	21/02/2019
1001276755QT901	3/06/2019	6/06/2019	30/05/2019
1001279388QTE79	21/09/2019	18/11/2019	1/11/2019

- ALLEGED BREACH r 66.1 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.

ICP	Event Date	Entry Date	Date entered into contract
0002162791QTAB5	8/02/2019	13/02/2019	8/02/2019
0007003480NGA5E	27/05/2019	27/05/2019	21/05/2019

Gas acceptance notice

- ALLEGED BREACH (rule 69.1) GEND did not comply with the requirement to respond to a gas switching notice within 2 business days for 2 ICPs.

ICP	GAN entry date	GNT received date	GAN Expected switch date	Alleged breach
0000013521QT007	25/3/19	15/3/19	1/3/19	r69.1
0003067549NGCD7	23/9/19	17/9/19	1/9/19	r69.1

Gas transfer notice

OBSERVATIONS

GEND a reading was described as an estimate when it was an actual read.

0000013521QT007

GEOL a final read from a customer was described as an estimate when it was an actual read.

0000006081QT2DC

GENG the annualised consumption estimate was 14, Gentrack suggests 10

0000000091QTD

GENG a final read from a customer was entered as an estimate when it was an actual read

0000012259GN552

- ALLEGED BREACH r72.1.8 GEND the number of dials should have been 6 not 8
0000037811QTDBA
- ALLEGED BREACH r72.1.8 GEND the number of dials should have been 7 not 8
0000072511QT407
- ALLEGED BREACH r72.1.8 GEND the number of dials should have been 7 not 8
0000531691QT6E8