



GAS REGISTRY AND SWITCHING PERFORMANCE AUDIT PULSE ENERGY ALLIANCE LP

Date of audit: 7, 8 and 14 October 2020

Report completed: 8 February 2021

Under the Gas (Switching Arrangements) Rules 2008 the Gas Industry Company commissioned Langford Consulting to undertake a performance audit of Pulse Energy Alliance LP. 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 Pulse Energy Alliance LP (Pulse).

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 Pulse control environment, for the fifteen areas evaluated, is “effective” for ten areas, “adequate” for one area and “not adequate” for four areas.

Four breach allegations are made in relation to Pulse regarding the non-compliant areas and are summarised in the following table. The following observation and recommendation were also made:

OBSERVATION If the issue relating to Pulse 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.

RECOMMENDATION That the systems for ensuring alignment of Pulse’s systems and the registry be reviewed to ensure alignment between data sets and for resolving any discrepancies.

Summary of breach allegations

Section	Summary of issue	Rules potentially breached
3	The contact phone number on the registry is out of date	r10.1.1
7	Pulse initiate switches without a current use of system agreement with all the relevant distributors	r65.2.3
8	Pulse was late entering registry values for 28 new ICPs out of 32 ICPs drawn from the maintenance breach history report.	r54.1
9	Status updates are not being done as soon as reasonably practicable.	r61.1

Summary of report findings

Issue	Section	Control Rating (refer to appendix 1 for definitions)	Compliance Rating	Comments
Participant registration information	3	Not adequate	Not compliant	The phone number supplied had been disconnected
Obligation to act reasonably	4	Effective	Compliant	No examples of Pulse acting unreasonably were found
Obligation to use registry software competently	5	Effective	Compliant	No examples of Pulse using software incompetently were found
ICP identifier on invoice	6	Effective	Compliant	The ICP identifier is on Pulse invoices
Use of System Agreements	7	Not adequate	Not compliant	Some agreements held by Vector on behalf of Pulse appear to have expired
Uplift of READY ICP	8	Not adequate	Not compliant	Pulse was late entering registry values for 28 new ICPs
Maintenance of ICP information in registry	9	Not adequate	Not compliant	A large proportion of status updates took more than 20 business days and maintenance was done by infrequent batch clean ups
Resolving discrepancies	10	Adequate	Compliant	Processes for ensuring system information is aligned with the registry are in place but they could be tighter
Initiation of consumer switch/switching notice	11.1	Effective	Compliant	No issues found with this process
Response to a gas switching notice	11.2	Effective	Compliant	No issues found with this process

Gas acceptance notice	11.3	Effective	Compliant	No issues found with this process
Gas transfer notice	11.4	Effective	Compliant	No issues found with this process
Accuracy of switch readings	11.5	Effective	Compliant	No issues found with this process
Gas switching withdrawal	11.6	Effective	Compliant	No issues found with this process
Switch reading negotiation	11.7	Effective	Compliant	No issues were found with this process

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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 Pulse Energy Alliance LP (Pulse). The audit was commissioned under rule 88 and was conducted within terms of reference prepared by GIC.

The engagement commenced on 15 January 2020. Pulse use Vector Data Services (Vector) as a service provider so the on-site part of this audit was completed at Vector's offices in New Plymouth and was done in parallel with the audits of other retailers who use Vector's services. Arrangements for site visits were made, but cancelled twice due to pandemic protocols, but were able to occur in October. Other aspects of this audit were conducted using e-mail and virtual meetings with Pulse.

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

Pulse has been a registry participant since 23 October 2013.

Pulse use Vector Data Services as their agent for dealing with switching and other registry matters. Vector use a SQL database with an Access front end, known as Artemis, to achieve this. Interactions between Vector and Pulse occur mostly via a regular file transfer protocol (FTP) with additional ad hoc emails, as required.

2.1 Summary of Previous Audit

This is the first audit for Pulse under the rules.

2.2 Switch Breach Report

Pulse has had 18 alleged switching breaches, 17 reported by Jade and one by Langford Consulting. However, it is noticeable that these allegations were all reported between 2015 and 2018, there have been none reported in 2019. Pulse started to use Vector's services from February 2018.

2.3 Provision of information to the Auditor (rule 91)

In conducting this audit, the auditor may request any information from Pulse, the allocation agent and any allocation participant. Information was also provided by Vector as Pulse's data services agent.

Information was provided by Pulse and Vector in a timely manner in accordance with this rule. It is considered that all parties have complied with the requirements of this rule.

3. Participant registration information (rules 7 and 10)

The participant registration information was reviewed, it was found the phone number had been disconnected.

ALLEGED BREACH r10.1.1 The phone number on the registry was not current.

4. Obligation to act reasonably (rule 34)

No examples of Pulse acting unreasonably were found.

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

No examples of Pulse using registry software incompetently were found.

6. ICP identifier on invoice (rule 36)

An example of a Pulse invoice was viewed and was 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, the auditor requested sight of the current use of system agreements with the gas distributors. As a part of the company's agreement with Vector, Vector Gas Ltd holds the use of system agreements with the distributors.

The auditor conducted a brief review of the use of system agreement documentation immediately available at Vector's premises. There was evidence of Vector Gas Ltd having a use of system agreement with all of the four current distributors, but this initial review suggested those with First Gas Ltd and GasNet (Wanganui) had expired. Those with Vector Ltd and Powerco looked as if they may still be current as no expiry date could be identified.

ALLEGED BREACH r65.2.3 Pulse initiate switches without a current use of system agreement with all the relevant distributors

It is noted however that Vector believes their agreements with First Gas and GasNet were amended in 2014 to allow Vector to provide our delivered gas service arrangements for third parties and in 2015 they were all assigned from Vector Limited to Vector Gas Trading Limited. Based on the above Vector believes they will be able to demonstrate they have Use of Systems agreements in place with all the open access networks albeit these are all up to or more than 20 years old and are seeking confirmation from GasNet and First Gas that this is their understanding. Nonetheless Vector acknowledges this does not reduce the need for the networks to offer and retailers to negotiate new up to date agreements.

OBSERVATION If the issue relating to Pulse 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)

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.

Vector demonstrated the process for creating new ICPs on the retailer's instructions. Pulse send an e-mail requesting Vector claim the ICP on their behalf, they supply the ICP, event date, status, connection status and allocation group. Vector initiate the claim, asking for any additional information from Pulse to complete all the required fields. Pulse liaises with the meter owner for the relevant paperwork and the initial read.

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, there were 32 ICPs reported. But this on its own is not enough to establish a breach as it is necessary to also consider the date the contract was entered into. When the contract date was also included it was found that 28 of the 32 were not input within the 2 business days.

- ALLEGED BREACH rule 54.1 Pulse was late entering registry values for 28 new ICPs out of 32 ICPs drawn from the maintenance breach history report.

See appendix 2 for detail regarding these alleged breaches

9. Maintenance of ICP information in the registry (rules 58 to 61)

Vector explained their processes.

Vector checks every day to see if Pulse have any items on the breach timer report. If so they send Pulse details by email so they can supply the necessary response within the required timeframes.

Vector also routinely pull LIS files from the registry once a month to identify any fields that have changed to update their SQL database.

Pulse notify Vector of any status changes by e-mail and also tell them the event date. Vector then action these on receipt.

Vector also use month end files from the distributors to identify discrepancies which suggest a status change has been missed. For example if a distributors' report showed some ICPs as being active when they were still INACT in Vector's system and on the registry. Vector raise any discrepancies with Pulse who in turn advise if a status change should be made.

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 but for this year's audit a more tailored approach has been taken to this requirement. 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 Pulse 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.

Status Updates	Total ICPs	Update greater than 5 business days	Update greater than 20 business days
ACTC	447	342	307
ACTV	411	96	34
INACP	1	1	1
INACT	171	35	11
TOTAL as %	1,030	46%	34%

As a part of this analysis it was noted that there were a large number of status updates done across three days in August 2019. Pulse were asked what prompted this and they responded that this was a mass clean up they do once in a while. In total there were 266 status updates done over 3 days in August 2019 where the event date was more than 20 business days prior to the update date. This suggests Pulse are not using reasonable endeavours to maintain current and accurate information and that they are not updating information as soon as practicable.

ALLEGED BREACH: In 2019 Pulse did 353 status updates that were more than 20 business days after the effective date. Of these 266 were done as part of a mass clean up across 3 days in August. These were not updated as soon as reasonably practicable (r 61.1)

Further detail is given in appendix 2.

	No of status events	Paired with
ACTC	447	GAS
ACTV	411	GAS
INACP	1	GPM
INACT	171	GVC/GMC/GNC/GNM/GVM

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

10. Resolving discrepancies (rule 62.1)

The records in the Pulse system were compared against the information in the registry for gas gate; meter pressure; dials and multiplier. Generally there was good alignment, but some discrepancies were found in the gas gate, meter pressure and number of dials fields. Further details can be found in appendix 2 of the associated downstream reconciliation audit report.

As these registry fields are not the responsibility of the retailer to keep current no alleged breach has been made here under rule 62.1, however it is recommended that Pulse review its processes for ensuring alignment between its systems and the registry, and for dealing with any discrepancies identified. Further reference is made to these discrepancies in the associated downstream reconciliation audit report.

RECOMMENDATION That the systems for ensuring alignment of Pulse’s systems and the registry be reviewed to ensure alignment between data sets and for resolving any discrepancies.

11. Switching

Vector send Pulse a switch report every day so they can supply the necessary response within the required timeframes. Communication between Pulse and Vector is by FTP, this typically arrives by 11.30 each day for Vector to action. Vector process instructions from Pulse every day, typically by midday.

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

When Vector receive an instruction from Pulse to initiate a switch their process is:

- Request a REQ file
- Add the ICP to their SQL database
- Create a GNT in Access
- Send the GNT to the registry and receive GNT acknowledgment

- The registry then prompts the losing retailer

Vector process any such requests daily.

The processes for the initiation of a switch were reviewed for compliance with the requirements to be sent within 2 business days of entering a contract to supply gas to the consumer, along with a review of a sample of GNTs (notice to transfers). (r66.1)

Pulse had 1,562 GNTs in 2019, 805 were 'S' switch types and 757 'SM' switch types. A sample were reviewed to see if they were initiated within 2 business days of entering into a contract. No breaches were found.

The 'S' type GNTs were all reviewed for compliance with r67.3 and 67.3A to check they weren't sent more than 10 business days prior to the switch date, none had a requested a switch date so there were no breaches found.

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

Vector receives an FTP which runs every 10 minutes. At about 10am every morning Vector go into their Access database and import all files. Any GNTs from the previous 24 hours will appear. They send Pulse a file daily of any GNTs relevant to them and Pulse send them a response instruction back the next morning, which will include a partly completed GTN with the relevant meter read information. Vector action Pulse instructions, including the completion of the other GTN fields.

The SWLEN report was reviewed for all switches in 2019 where Pulse was the losing retailer. Analysis was done to identify a list of those with a switch length of more than 3 days as these may have potentially breached r69.1. 459 were found and a sample of these were further reviewed individually in the gas registry, but all were found to have been acknowledged by a GAN within two business days.

11.3 Gas acceptance notice (rule 70)

A sample of GANs (acceptance notices) initiated by Pulse were reviewed for compliance with the 2-business day rule in r69.1 and the switch date rules in 70.2.

No issues were found.

11.4 Gas transfer notice (rule 72)

A sample of GTNs (transfer notices) where Pulse was the responsible retailer were reviewed for compliance with r 72 and r74, no issues arose.

11.5 Accuracy of switch readings (rule 74)

The accuracy of switch readings was examined as a part of the activities detailed in section 10.4 above. There are no additional issues to report in this section.

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

If Vector identify a GNW for Pulse when they do their daily import of registry files, they screenshot this and send it to Pulse. Pulse conduct any discussions with the other retailer, Vector take no part in this. Pulse then instructs Vector to accept or reject the withdrawal and Vector sends the GAW file.

If the retailer wants to initiate a GNW they send Vector the details by email, Vector convert this into the GNW format and submit it to the registry.

An analysis was undertaken of GNWs (switching withdrawal notices) submitted to the registry in 2019, 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 Pulse was the old retailer and the new retailer. The results are shown in the tables below.

PUNZ as responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	42	0.6%
N	DF	12	0.2%
N	WP	6	0.1%
O	CR	45	0.5%
O	DF	7	0.1%
O	MI	2	0%
O	UA	2	0%
O	WP	1	0%
O	WS	46	0.5%

PUNZ not responsible retailer

Role code	Requesting reason	Number	% of GNTs
N	CR	47	0.6%
N	DF	11	0.2%
N	MI	1	0%
N	WP	13	0.2%
N	WS	1	0%
O	CR	45	0.5%
O	DF	8	0.1%
O	MI	2	0%
O	UA	2	0%
O	WP	1	0%
O	WS	47	0.5%

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

CR is customer request; DF date failed; MI metering issue; UA unauthorised switch; WS is wrong switch type; WP is wrong premises.

There are NIL entries for other reason codes.

A sample were reviewed to confirm the correct reason codes were given, no issues arose.

11.7 Switch reading negotiation (rule 79, 81)

There were 58 instances of Pulse initiating a GNC in 2019. A sample of these were reviewed.

There were 61 instances of Pulse receiving a GNC. A sample of these were also reviewed on-site.

There were no matters arising from these reviews.

12. Bypass of distributor (rule 82)

Pulse is not a retailer on a bypass network so they have no responsibility under r82.

13. Breach Allegations

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7	Pulse initiate switches without a current use of system agreement with all the relevant distributors	r65.2.3
8	Pulse was late entering registry values for 28 new ICPs out of 32 ICPs drawn from the maintenance breach history report.	r54.1
9	Status updates are not being done as soon as reasonably practicable.	r61.1

14. Conclusion

The summary of report findings shows that the Pulse control environment, for the fifteen areas evaluated, is “effective” for ten areas, “adequate” for one area and “not adequate” for four areas.

Four breach allegations are made in relation to Pulse regarding the non-compliant areas and are summarised in the above table. The following observation and recommendation were also made:

OBSERVATION If the issue relating to Pulse 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.

RECOMMENDATION That the systems for ensuring alignment of Pulse's systems and the registry be reviewed to ensure alignment between data sets and for resolving any discrepancies.

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

8 Uplift of Ready ICPs

Input Date	Effective Date	Days Over due	ICP Identifier / Gas Gate Code / Loss Factor Code	Varies	Entered into contract date	>2bdays
11/02/2019	23/05/2018	179	1000572933PGEF9	PUNZ	31/01/2019	7
27/02/2019	20/02/2019	3	1001296943NGF93	PUNZ	8/02/2019	14
27/02/2019	21/02/2019	2	1001296939NG85F	PUNZ	5/02/2019	16
11/03/2019	12/02/2019	17	0000013755GN2E9	PUNZ	25/01/2019	30
24/04/2019	20/03/2019	21	1002059696QT894	PUNZ	21/02/2019	42
24/04/2019	12/04/2019	4	1002060708QT060	PUNZ	21/03/2019	22
4/06/2019	8/05/2019	16	1002062815QT9D9	PUNZ	26/04/2019	27
6/06/2019	27/05/2019	5	0000032336GN5B5	PUNZ	10/05/2019	19
13/06/2019	10/06/2019	1	1000582916PGB7F	PUNZ	13/05/2019	23
18/06/2019	5/06/2019	7	1000583423PG560	PUNZ	7/06/2019	8
21/06/2019	17/06/2019	2	1002063588QTDCCD	PUNZ	14/05/2019	28
2/07/2019	26/06/2019	2	1002062977QTFA8	PUNZ	16/04/2019	51
4/07/2019	17/05/2019	31	1002063307QT15F	PUNZ	7/05/2019	42
4/07/2019	22/05/2019	28	1000581650PG5BA	PUNZ	5/04/2019	60
4/07/2019	27/06/2019	3	1000582890PG6BE	PUNZ	28/06/2019	5
12/09/2019	30/08/2019	7	1001297907NGD9C	PUNZ	29/08/2019	11
12/09/2019	9/09/2019	1	1001297703NGA9D	PUNZ	16/07/2019	43
23/09/2019	17/09/2019	2	1002066937QTB8D	PUNZ	5/09/2019	13
24/09/2019	16/09/2019	4	1002068675QTE62	PUNZ	2/09/2019	17
24/09/2019	18/09/2019	2	1001297894NG7BF	PUNZ	9/09/2019	12
1/10/2019	26/09/2019	1	1002069808QT3CF	PUNZ	25/09/2019	5
3/10/2019	12/07/2019	57	1000583830PGF01	PUNZ	7/05/2019	107
10/10/2019	27/09/2019	7	1002070048QT526	PUNZ	16/09/2019	19
23/10/2019	18/10/2019	1	1000586439PGA7C	PUNZ	7/10/2019	13
23/10/2019	18/10/2019	1	1000585654PG230	PUNZ	30/09/2019	18
30/10/2019	16/10/2019	7	1000585642PG912	PUNZ	17/10/2019	9
5/11/2019	29/10/2019	3	1002069603QTB10	PUNZ	28/08/2019	49
2/12/2019	27/11/2019	1	1001298187NG1BB	PUNZ	18/11/2019	11

9 Maintenance of ICP information in the registry

Status updates over 20 business days

ICP	Event type	Event date	Entry date	Status	Connection status	Bus days
0001010520NGEDD	Status	9/11/2018	7/01/2019 11:50	PUNZ ACTC	GAS	40
0003020385NG1D5	Status	31/03/2018	10/01/2019 11:48	PUNZ ACTV	GAS	202
1001293248NG569	Status	30/09/2018	14/01/2019 11:57	PUNZ ACTC	GAS	74

0001436587QT87C	Status	6/07/2018	17/01/2019 12:03	PUNZ	ACTC	GAS	138
0007007177NG406	Status	29/07/2017	17/01/2019 12:03	PUNZ	ACTC	GAS	382
0004010122NG60B	Status	13/12/2018	21/01/2019 11:45	PUNZ	ACTV	GAS	25
0002127851QTEEO	Status	24/11/2018	23/01/2019 11:42	PUNZ	ACTV	GAS	40
1001287446QT853	Status	1/06/2018	23/01/2019 11:42	PUNZ	ACTC	GAS	166
0001746771QT5EE	Status	26/11/2018	24/01/2019 11:54	PUNZ	ACTV	GAS	41
0002201591QTCBE	Status	4/03/2017	24/01/2019 11:54	PUNZ	ACTC	GAS	491
0000898241QTB41	Status	3/08/2018	28/01/2019 11:54	PUNZ	ACTC	GAS	123
0000723931QT281	Status	16/07/2018	1/02/2019 12:13	PUNZ	ACTV	GAS	141
1000498151PG6D0	Status	17/12/2018	14/02/2019 11:42	PUNZ	ACTC	GAS	39
0001430213QTC53	Status	7/01/2019	15/02/2019 12:07	PUNZ	ACTC	GAS	27
0004009124NG3C5	Status	30/11/2018	15/02/2019 12:07	PUNZ	ACTC	GAS	51
0000480351QTFC7	Status	19/12/2018	27/02/2019 11:45	PUNZ	ACTC	GAS	46
0000085051QT25B	Status	17/12/2018	6/03/2019 12:01	PUNZ	ACTV	GAS	53
0004008670NG465	Status	9/11/2018	21/03/2019 11:39	PUNZ	ACTC	GAS	90
1001271826QTBFB3	Status	21/02/2019	25/03/2019 11:47	PUNZ	ACTV	GAS	23
1001271826QTBFB3	Status	22/02/2019	25/03/2019 11:47	PUNZ	ACTC	GAS	22
0001017566NG997	Status	21/01/2019	29/03/2019 11:45	PUNZ	ACTV	GAS	47
0000031724GN17C	Status	3/03/2017	5/04/2019 11:39	PUNZ	ACTC	GAS	541
0001776581QTED2	Status	14/03/2019	24/04/2019 10:02	PUNZ	ACTV	GAS	27
1001288157QT2DE	Status	15/03/2019	24/04/2019 10:02	PUNZ	ACTV	GAS	26
0000563921QTB61	Status	29/03/2019	13/05/2019 11:43	PUNZ	ACTC	GAS	28
1001246453QTAA1	Status	6/01/2019	13/05/2019 11:43	PUNZ	ACTV	GAS	84
0002300871QT6C0	Status	1/04/2019	22/05/2019 11:49	PUNZ	ACTC	GAS	34
1001122910QT9A0	Status	15/04/2019	22/05/2019 11:49	PUNZ	ACTC	GAS	24
0000015784GN62E	Status	1/05/2019	30/05/2019 12:20	PUNZ	ACTC	GAS	22
0000013279GN9A7	Status	8/04/2019	4/06/2019 9:15	PUNZ	ACTC	GAS	37
0001783011QT68C	Status	3/05/2019	6/06/2019 11:41	PUNZ	ACTC	GAS	24
0001011375NGC3C	Status	10/03/2018	10/06/2019 11:43	PUNZ	ACTC	GAS	316
0001794791QT045	Status	1/04/2019	12/06/2019 12:05	PUNZ	ACTV	GAS	48
0001819831QTC2A	Status	20/03/2019	19/06/2019 11:42	PUNZ	INACT	GVC	61
0001034210PG512	Status	20/04/2018	20/06/2019 11:50	PUNZ	ACTC	GAS	295
0007003757NG9D5	Status	20/03/2019	20/06/2019 11:50	PUNZ	INACT	GVC	62
0002022111QT600	Status	29/10/2018	21/06/2019 11:41	PUNZ	ACTV	GAS	160
0003036523NG362	Status	17/03/2019	24/06/2019 11:48	PUNZ	ACTV	GAS	66
0000031149GN7D1	Status	20/03/2019	1/07/2019 11:59	PUNZ	INACT	GVC	69
0001502850PG482	Status	17/01/2019	5/07/2019 11:46	PUNZ	ACTV	GAS	114
0001414440QT1D0	Status	5/05/2019	12/07/2019 11:51	PUNZ	ACTV	GAS	49
0000054271QT8F8	Status	6/03/2019	15/07/2019 11:49	PUNZ	INACT	GNC	89
0001636861QTE99	Status	18/02/2019	15/07/2019 11:49	PUNZ	INACT	GNC	101
0003063436NG9D0	Status	11/05/2018	15/07/2019 11:49	PUNZ	INACT	GNC	297
0004001646NGEB2	Status	27/02/2018	15/07/2019 11:49	PUNZ	INACT	GNC	350
0004004017NGBD9	Status	11/08/2018	15/07/2019 11:49	PUNZ	ACTC	GAS	231
0007000843NGF9D	Status	7/02/2019	15/07/2019 11:49	PUNZ	INACT	GNC	108
0002149751QTB77	Status	31/05/2017	17/07/2019 11:48	PUNZ	ACTC	GAS	546
0001003806NGD0E	Status	22/08/2017	19/07/2019 12:13	PUNZ	ACTC	GAS	489
0007002473NG729	Status	8/06/2019	19/07/2019 12:13	PUNZ	ACTC	GAS	30
0001000696NG602	Status	21/07/2017	22/07/2019 11:51	PUNZ	INACT	GVC	512

0001003806NGD0E	Status	5/06/2019	22/07/2019 11:51	PUNZ	ACTV	GAS	34
0001003806NGD0E	Status	6/06/2019	22/07/2019 11:51	PUNZ	ACTC	GAS	33
0002001572NG4DA	Status	21/07/2017	22/07/2019 11:51	PUNZ	INACT	GVC	512
0002028030NG692	Status	9/05/2019	22/07/2019 11:51	PUNZ	ACTV	GAS	52
1001254941QTE20	Status	14/06/2019	25/07/2019 11:47	PUNZ	ACTV	GAS	30
1001242145QT206	Status	12/12/2018	29/07/2019 12:03	PUNZ	ACTC	GAS	154
1001254246NG622	Status	5/07/2019	14/08/2019 11:42	PUNZ	ACTV	GAS	29
0000032221QT768	Status	16/08/2017	19/08/2019 11:55	PUNZ	ACTC	GAS	514
0001435376QTOC8	Status	24/05/2018	19/08/2019 11:55	PUNZ	ACTC	GAS	313
0001442692QTOA4	Status	14/08/2017	19/08/2019 11:55	PUNZ	ACTC	GAS	516
0001664751QT65A	Status	1/02/2019	19/08/2019 11:55	PUNZ	ACTC	GAS	136
0007000669NG652	Status	17/03/2018	19/08/2019 11:55	PUNZ	ACTC	GAS	361
0007008644NG95C	Status	29/01/2017	19/08/2019 11:55	PUNZ	ACTC	GAS	656
1000510867PGFE7	Status	21/07/2017	19/08/2019 11:55	PUNZ	ACTC	GAS	532
0004202473NG43A	Status	8/07/2019	21/08/2019 11:46	PUNZ	ACTV	GAS	33
0000019225GNCF1	Status	15/03/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	629
0001624991QTC2B	Status	10/08/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	523
0001776381QT8D4	Status	18/07/2019	26/08/2019 12:05	PUNZ	ACTC	GAS	28
0002002394NGB09	Status	3/12/2018	26/08/2019 12:05	PUNZ	ACTC	GAS	181
0002007290NG427	Status	20/04/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	603
0002203011QTFB1	Status	10/09/2018	26/08/2019 12:05	PUNZ	ACTC	GAS	241
0003028187NG657	Status	8/05/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	591
0007002702NGD32	Status	21/07/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	537
0075001401PGCAA	Status	21/02/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	645
1000495441PG358	Status	17/07/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	541
1000506261PG943	Status	7/02/2018	26/08/2019 12:05	PUNZ	ACTC	GAS	394
1000523962PG860	Status	6/01/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	677
1001154922QT1A4	Status	4/08/2018	26/08/2019 12:05	PUNZ	ACTC	GAS	266
1001164249QT2A2	Status	20/06/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	560
1001294092NG4DD	Status	1/09/2017	26/08/2019 12:05	PUNZ	ACTC	GAS	507
0000022123GN0B1	Status	30/05/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	316
0000023969GN128	Status	18/05/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	324
0000026563GN895	Status	27/07/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	274
0000031159GND7C	Status	9/02/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	394
0000237177QT214	Status	4/02/2019	28/08/2019 11:52	PUNZ	ACTC	GAS	142
0000380221QT695	Status	21/07/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	539
0000599651QTAEF	Status	17/01/2019	28/08/2019 11:52	PUNZ	ACTC	GAS	152
0000694211QT2DF	Status	5/02/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	398
0000823061QTDFA	Status	30/05/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	316
0000838421QT45F	Status	5/02/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	398
0001018635NG73C	Status	19/12/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	432
0001023473NG0DD	Status	16/11/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	455
0001392478QTBDD	Status	23/08/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	255
0001405244QTF9D	Status	10/09/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	243
0001424619QTCOA	Status	6/04/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	354
0001427800QTCB5	Status	13/08/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	263
0001429685QTA7B	Status	9/08/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	265
0001436180QT9B7	Status	31/07/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	272

0001551490PGEF5	Status	15/11/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	456
0001732690PGC92	Status	16/11/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	455
0001767681QT490	Status	29/03/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	360
0001778231QTBA2	Status	4/10/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	225
0001779031QT005	Status	19/06/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	302
0001799101QT384	Status	9/10/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	222
0001839111QT1BB	Status	17/08/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	259
0002107531QTDD5	Status	25/05/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	319
0002284091QT1BE	Status	11/01/2019	28/08/2019 11:52	PUNZ	ACTC	GAS	156
0003011844NG9FD	Status	4/12/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	443
0003024148NG5E6	Status	31/01/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	401
0003040520NG0DB	Status	21/07/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	539
0004219448NGA17	Status	28/08/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	513
0004224422NGC7A	Status	31/03/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	358
0006000827NG7DE	Status	1/03/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	380
0007001204NGB58	Status	20/10/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	474
0007002191NG813	Status	26/10/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	470
0042115000PG85E	Status	31/08/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	249
1000506373PGA6F	Status	19/04/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	345
1000514989PG942	Status	6/11/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	463
1000523614PG3BD	Status	29/03/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	360
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1001119033QTF0	Status	20/03/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	367
1001149380QT1F5	Status	12/11/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	198
1001251816QT5C6	Status	6/12/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	180
1001256683QT505	Status	9/07/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	288
1001273776QTFB4	Status	31/12/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	163
1001274931QT2B0	Status	4/12/2017	28/08/2019 11:52	PUNZ	ACTC	GAS	443
1001276870QT614	Status	15/05/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	327
1001277010NGE8F	Status	2/10/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	227
1001279292QTF41	Status	17/05/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	325
1001281419QTA45	Status	11/04/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	351
1001288002QTE9D	Status	26/01/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	404
1001294102QT4F8	Status	15/08/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	261
1002043480QTF10	Status	30/06/2018	28/08/2019 11:52	PUNZ	ACTC	GAS	293
1002049449QT8EE	Status	31/01/2019	28/08/2019 11:52	PUNZ	ACTC	GAS	144
0000011741GNA0E	Status	7/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	396
0000017236GN25C	Status	13/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	392
0000017913GN148	Status	27/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	296
0000018242GNF6B	Status	9/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	288
0000018359GN216	Status	18/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	237
0000018522GNF99	Status	4/12/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	182
0000021699GND70	Status	30/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	250
0000022586GN9E0	Status	22/01/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	408
0000022593GNE02	Status	14/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	371
0000022972GN4F1	Status	13/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	306
0000023366GN4FC	Status	11/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	329
0000024672GNE3E	Status	27/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	230

0000025466GNE3E	Status	23/01/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	407
0000026667GNA9C	Status	11/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	263
0000026829GND A9	Status	25/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	232
0000027379GN70F	Status	1/10/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	228
0000028219GN89B	Status	6/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	289
0000031312GNB0A	Status	19/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	388
0000031458GN43C	Status	15/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	434
0000048161QT237	Status	22/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	150
0000048721QT694	Status	21/07/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	539
0000076401QT12E	Status	8/02/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	139
0000119871QT72B	Status	25/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	298
0000125651QT6D9	Status	4/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	443
0000142971QT2BB	Status	29/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	251
0000157351QTA25	Status	18/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	303
0000181071QTDE2	Status	12/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	241
0000213931QTE7E	Status	13/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	458
0000236310QTB89	Status	22/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	299
0000237610QTF2C	Status	26/07/2019	28/08/2019 11:53	PUNZ	ACTV	GAS	24
0000237610QTF2C	Status	27/07/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	23
0000246701QTB D9	Status	11/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	329
0000261621QT225	Status	7/03/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	120
0000306431QT0DB	Status	27/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	296
0000441651QTFD2	Status	21/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	473
0000476511QTB38	Status	12/10/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	219
0000480361QTB83F	Status	14/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	305
0000494371QTCF3	Status	27/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	296
0000609941QT43D	Status	28/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	361
0000646321QT332	Status	21/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	300
0000691751QT25F	Status	24/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	277
0000785121QTB09	Status	31/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	315
0000786141QT619	Status	9/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	331
0000799251QTE36	Status	27/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	426
0000812191QT465	Status	22/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	256
0000837961QTA92	Status	19/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	280
0000877711QT251	Status	9/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	158
0000887321QTC34	Status	31/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	315
0000898561QT916	Status	2/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	379
0000918161QTE5E	Status	22/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	256
0000945041QT35B	Status	7/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	333
0001000316NG64D	Status	1/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	488
0001002012NG704	Status	25/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	147
0001002059NGB75	Status	4/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	334
0001003971NGC9D	Status	5/11/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	203
0001007791NG6AC	Status	9/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	460
0001008782NG9A1	Status	6/05/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	82
0001026321NG072	Status	6/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	245
0001028905NGEE7	Status	23/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	321
0001032618NG2BF	Status	10/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	287

0001394828QTA16	Status	14/02/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	135
0001401554QTCB2	Status	24/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	254
0001403620QT8A6	Status	9/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	374
0001409340QTC13	Status	30/11/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	184
0001429323QT6EE	Status	28/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	252
0001431347QTDF5	Status	12/03/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	117
0001436989QT7EB	Status	25/04/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	341
0001452771QT73B	Status	15/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	327
0001491742PGOED	Status	15/03/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	114
0001511595PG12B	Status	17/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	454
0001608411QTE24	Status	7/05/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	81
0001643961QTA04	Status	20/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	367
0001653011QTEB1	Status	24/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	254
0001657701QTD9E	Status	21/07/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	539
0001706061QTB4D	Status	20/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	279
0001735301QT4EB	Status	2/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	379
0001767821QTA84	Status	13/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	284
0001802201QT6D9	Status	14/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	262
0001850591QT608	Status	1/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	380
0002007225NGBDA	Status	6/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	484
0002007601NGB84	Status	29/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	228
0002008149NGD57	Status	31/03/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	619
0002009272NG6D8	Status	7/06/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	59
0002018871QTF95	Status	21/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	150
0002029190NG629	Status	4/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	486
0002032071QT815	Status	21/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	278
0002065441QT4F8	Status	30/01/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	402
0002110851QTBAC	Status	24/04/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	89
0002202161QT248	Status	27/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	469
0002242811QT589	Status	21/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	257
0002315511QT3F9	Status	25/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	298
0002344301QTD86	Status	13/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	479
0002376796QT1C6	Status	31/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	272
0002377869QTOA0	Status	7/08/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	528
0002380149QT500	Status	15/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	434
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0003006924NG388	Status	17/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	238
0003028638NG439	Status	14/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	239
0003033230NGD2D	Status	25/02/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	128
0004001305NG5D2	Status	26/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	318
0004003265NG066	Status	18/09/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	498
0004003380NGE97	Status	26/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	383
0004004143NGBDF	Status	28/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	318
0004008131NG587	Status	13/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	306
0004008257NG8FB	Status	7/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	244
0004009484NGEDF	Status	30/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	316
0004010235NG26F	Status	6/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	463
0004010249NG42C	Status	19/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	150

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0004010856NGB55	Status	9/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	265
0004201320NGD10	Status	15/10/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	218
0004203283NG38B	Status	26/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	275
0004217655NGD26	Status	6/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	289
0004220201NGD69	Status	1/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	466
0004227305NG107	Status	3/04/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	101
0004227591NG9EC	Status	7/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	462
0007000170NGDAC	Status	18/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	476
0007000866NGF87	Status	16/04/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	348
0007001332NG42B	Status	26/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	231
0007002379NGABA	Status	11/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	286
0007004157NGBB3	Status	23/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	298
0075000471PG857	Status	27/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	253
0075000965PG6F8	Status	15/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	434
0075002105PGA45	Status	25/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	319
0075003274PG1FE	Status	13/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	392
0088409603PG2F5	Status	8/10/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	223
1000384674QT51C	Status	17/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	325
1000496411PG9B0	Status	21/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	430
1000499772PG0E3	Status	2/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	379
1000508625PGE2D	Status	5/10/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	224
1000546143PGC05	Status	15/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	434
1000548048PG315	Status	30/04/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	86
1000562968PG0C4	Status	8/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	159
1000754990QT44D	Status	17/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	477
1000755922QT7DA	Status	20/05/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	72
1001112410QTD84	Status	31/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	315
1001131405QT14B	Status	13/06/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	306
1001131410QT6A9	Status	21/07/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	539
1001132939QT245	Status	28/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	318
1001140244QT2B4	Status	18/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	324
1001140350QT017	Status	1/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	400
1001140780QT154	Status	18/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	324
1001140798QT9ED	Status	10/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	482
1001148765QTBA1	Status	20/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	279
1001158481QTBFB3	Status	12/01/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	414
1001240681QT8A1	Status	15/10/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	218
1001241245NG523	Status	1/05/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	85
1001241500QT30D	Status	6/04/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	354
1001242957NGEE5	Status	20/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	279
1001243503QTC8D	Status	11/01/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	156
1001250623QT8DA	Status	1/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	466
1001254938QT52C	Status	3/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	248
1001256049QT67D	Status	21/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	323
1001259211QTF06	Status	14/08/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	523
1001260714QTAC0	Status	14/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	239
1001262425QT13E	Status	24/01/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	406

1001266133QT999	Status	7/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	333
1001266846NGE44	Status	3/08/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	530
1001268739QT5CE	Status	23/02/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	128
1001270460QT575	Status	13/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	263
1001270842NG26F	Status	26/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	231
1001275756NG1E7	Status	19/04/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	345
1001277474QTAB2	Status	9/02/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	394
1001278877QT31E	Status	22/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	322
1001278903QTE4D	Status	3/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	248
1001279566QT15E	Status	25/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	232
1001282714QT4FD	Status	7/03/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	376
1001290752NGAB0	Status	30/11/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	445
1001293114NGD7C	Status	28/07/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	273
1001293361NGF69	Status	11/01/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	415
1001294343NG6D9	Status	4/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	247
1001295161QT668	Status	26/10/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	470
1001295534NG9E8	Status	12/04/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	94
1001295698NG1EA	Status	23/08/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	255
1001298094QT814	Status	21/12/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	430
1001299979QT55C	Status	21/07/2017	28/08/2019 11:53	PUNZ	ACTC	GAS	539
1002023942QTF2A	Status	24/05/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	320
1002040305QTAF7	Status	12/09/2018	28/08/2019 11:53	PUNZ	ACTC	GAS	241
1002048767QT483	Status	4/03/2019	28/08/2019 11:53	PUNZ	ACTC	GAS	123
0000029127GNE5B	Status	11/01/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	156
0000764431QT87C	Status	9/10/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	222
0000948551QT6D3	Status	23/01/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	149
0001009083NGB46	Status	6/05/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	82
0002352681QT0E8	Status	18/04/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	90
0007000558NGEEC	Status	29/01/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	146
0007000714NG550	Status	6/05/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	82
0054229610PGFFF	Status	12/11/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	198
1000572609PG49F	Status	27/09/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	230
1000575972PG479	Status	3/10/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	226
1001117966QTB7E	Status	28/09/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	229
1001244023QT0BD	Status	8/02/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	139
1001252216NGBEA	Status	10/05/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	78
1001256554QT68E	Status	8/10/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	223
1002023666QTC7A	Status	20/09/2018	28/08/2019 11:54	PUNZ	ACTC	GAS	235
1002039342QT381	Status	12/03/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	117
1002062718QT98D	Status	29/06/2019	28/08/2019 11:54	PUNZ	ACTC	GAS	43
0000019896GN889	Status	16/07/2019	29/08/2019 11:58	PUNZ	ACTV	GAS	33
0001764451QT135	Status	29/07/2019	6/09/2019 11:46	PUNZ	ACTC	GAS	30
0000018197GNC65	Status	10/07/2019	9/09/2019 11:46	PUNZ	INACT	GVC	44
1001289840QTD10	Status	18/08/2019	7/10/2019 11:49	PUNZ	ACTV	GAS	36
1002023453QTCCA	Status	7/12/2017	7/10/2019 11:49	PUNZ	ACTC	GAS	468
1001259328NG96D	Status	28/08/2019	14/10/2019 11:42	PUNZ	ACTV	GAS	34
1001294502QT8F9	Status	20/09/2019	21/10/2019 11:46	PUNZ	ACTC	GAS	22
0075000813PGB2E	Status	18/09/2019	29/10/2019 11:08	PUNZ	ACTV	GAS	29

0003061295NG849	Status	18/11/2018	31/10/2019 11:50	PUNZ	ACTC	GAS	238
1001277010NGE8F	Status	26/09/2019	1/11/2019 11:55	PUNZ	ACTV	GAS	26
0000333981QT16D	Status	1/08/2019	8/11/2019 11:42	PUNZ	ACTV	GAS	71
0003065088NG138	Status	6/09/2017	11/11/2019 11:41	PUNZ	INACP	GPM	558
1001299320QT90F	Status	19/09/2019	11/11/2019 11:41	PUNZ	ACTV	GAS	37
0002188051QT165	Status	21/07/2017	14/11/2019 11:52	PUNZ	ACTC	GAS	594
0002188051QT165	Status	18/06/2019	14/11/2019 11:52	PUNZ	ACTV	GAS	107
0007002428NG1F5	Status	19/03/2019	14/11/2019 11:52	PUNZ	ACTV	GAS	167
0000018799GN9F8	Status	5/08/2019	21/11/2019 11:39	PUNZ	ACTV	GAS	78
0000012951GN448	Status	24/07/2019	25/11/2019 11:43	PUNZ	ACTV	GAS	88
0000012951GN448	Status	25/07/2019	25/11/2019 11:43	PUNZ	ACTC	GAS	87
0003002993NGA70	Status	26/09/2019	25/11/2019 11:43	PUNZ	ACTV	GAS	42
0004003232NG5A4	Status	31/03/2017	27/11/2019 11:42	PUNZ	ACTC	GAS	683
0000018434GNDBF	Status	15/10/2019	31/12/2019 11:39	PUNZ	ACTC	GAS	53

10 Resolving Discrepancies

Gas Gate	Pulse System	Registry
0001002260NG8DB	HTV11301	HTK08301
0001003007NG146	MMU08001	PPA33201
0001016854NGA42	HTV11301	HTK08301
0001023934NGABA	HTV11301	HTK08301
0001036318NG13A	HTV11301	HTK08301
0001036319NGD7F	HTV11301	HTK08301
0003003527NG464	HTV11301	HTK08301
0003003863NG2C3	HTV11301	HTK08301
0003003900NG8F7	HTV11301	HTK08301
0003011207NGD92	HTV11301	HTK08301
0003012213NG4D5	HTV11301	HTK08301
0003012228NGDF9	HTV11301	HTK08301
0003013889NG209	HTV11301	HTK08301
0003013908NG202	HTV11301	HTK08301
0003013994NGEFB	HTV11301	HTK08301

Meter Pressure	Pulse System	Registry
0000018799GN9F8	1.25	0
0001210040PG088	2.5	1.5
0046142241PG946	1.5	1.2

Dials	Pulse System	Registry
0000011862GN494	6	5
0000837911QTF CF		4
0001420209QTC8E		4

0001732411QT524	6	5
0001770370PGBF8	5	4
0001900810PG7A9	5	4
0002010482NG488	5	4
0007001116NG273	5	4
0075000826PG199	6	5
1000525224PGD84	4	5

Appendix 3 Responses to draft report



Vector Limited
101 Carlton Gore Road
PO Box 99882
Newmarket
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8 July 2021

Julie Langford
Langford Consulting

Sent by email

Dear Julie

Gas Registry and Switching Performance Audit – Pulse Energy Alliance LP

1. Vector Gas Limited (*Vector*) appreciates the opportunity to comment on the draft Gas Registry and Switching Performance audit report for Pulse Energy Alliance LP (*Pulse*) issued on 25 May 2021.
2. Vector would like to provide you with two comments with regards to the reported breaches within the draft report regarding compliance with regulations 65.2.3 and 54.1.
3. We are pleased to confirm that we have sought and received formal confirmation from Firstgas, GasNet and Vector that our Use of Systems Agreements with these network operators are all current and uninterrupted since they were originally signed. As you know a new Powerco Use of Systems Agreement was signed in 2015.
4. We are happy to provide you with a copy of the confirmation letters from the 3 network operators and believe that we and therefore Pulse are compliant with regulation 65.2.3.
5. With regards to regulation 54.1 we have, following the audit in our New Plymouth offices implemented a new process designed to assist Pulse in complying with this regulation.
6. This new process raises an email when we have received the required information (event date, creation date connection and ICP Status) to start the ICP claim process. This email is sent to Pulse advising that a new ICP is ready to be claimed in the Gas Registry.
7. If you would like to discuss any of the above matters in greater detail then please do not hesitate to call me on 06 215 4427 or email at jim.raybould@vector.co.nz

Yours sincerely

A handwritten signature in black ink that reads 'Jim Raybould'.

Jim Raybould
Date Services Manager