

## Compliance Plan for Delta ATH – July 2021

Provision of Accurate Information			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 10.6 of Part 10</p> <p>From: 01-Feb-21</p> <p>To: 22-Jun-21</p>	<p>Each services access interface not recorded for 56 metering installations certified since 1/02/21.</p> <p>All options of metering installation type not recorded for 52 metering installations certified since 1/02/21.</p> <p>Maximum interrogation cycle not recorded for each services access interface in 52 of 65 metering installations certified since 1/02/21.</p> <p>Incorrect maximum interrogation cycle recorded for 36 of 65 metering installations certified since 1/02/21.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak as Delta has not updated its processes to reflect the code changes implemented on 1<sup>st</sup> February 2021.</p> <p>The MEP has correctly recorded the certification information in the registry therefore the impact is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-08-21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-08-21	

Metering Installation Type		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 8(2) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 22-Jun-21</p>	<p>Each services access interface not recorded for 56 metering installations certified since 1/02/21.</p> <p>All options of metering installation type not recorded for 52 metering installations certified since 1/02/21.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as weak as Delta has not updated its processes to reflect the code changes implemented on 1<sup>st</sup> February 2021.</p> <p>There is very little impact on other participants; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-8-21
Preventative actions taken to ensure no further issues will occur		Completion date
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-8-21
		Identified

Services Access Interface		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 10 of Schedule 10.4</p> <p>From: 01-Feb-21</p> <p>To: 22-Jun-21</p>	<p>Each services access interface not recorded for 56 metering installations certified since 1/02/21.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as weak as the Delta processes have not been updated to record each services access interface.</p> <p>There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-8-21
Preventative actions taken to ensure no further issues will occur		Completion date
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-8-21
		Identified

Advise MEP of Records, Certificates or Reports for a Metering Installation		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 14 Of Schedule 10.4  From: 10-Jan-19 To: 22-Jun-20	Certification records provided to the MEP late for two metering installations. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as they ensure records are provided within five business days for the vast majority of certifications completed.  The impact on MEPs is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Internal process to be reviewed and improved		30/08/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Improve data transfer process (from Certification to Data capture personnel)		30/08/2021
		Identified

Meter Requirements		
Non-compliance	Description	
Audit Ref: 3.11 With: Clause 26 (4) of Schedule 10.7  From: 02-Feb-21 To: 22-Jun-21	36 metering installation certification reports with maximum interrogation cycle incorrectly recorded. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because there is room for improvement. There is very little impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
DeltaView is being reviewed to ensure the correct MIC is selected as per the selected MEP. CT cert spreadsheet is going to be modified so that the MIC is auto selected according to the MEP that is selected.		30-8-21
Preventative actions taken to ensure no further issues will occur		Completion date
DeltaView is being reviewed to ensure the correct MIC is selected as per the selected MEP. CT cert spreadsheet is going to be modified so that the MIC is auto selected according to the MEP that is selected.		30-8-21
		Identified

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 36 (3) of Schedule 10.7</p> <p>From: 09-Apr-18</p> <p>To: 22-Jun-20</p>	<p>Maximum interrogation cycle not recorded for each services access interface in 52 of 56 metering installations certified since 1/02/21.</p> <p>36 metering installation certification reports with maximum interrogation cycle incorrectly recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as weak as the Delta processes have not been updated to record each services access interface and the associated maximum interrogation cycle.</p> <p>There is very little impact on other participants; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-8-21
Preventative actions taken to ensure no further issues will occur		Completion date
All options of metering installation type are now recorded on CT metering installation certs and we are in the process of applying this to cat 1 installation certs.		30-8-21
		Identified

ATH must not certify metering Installations under certain circumstances		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 8(2) of Schedule 10.8</p> <p>From: 27-Feb-21</p> <p>To: 22-Jun-20</p>	<p>Three Cat 2 installations certified with errors greater than 1.5% meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate because there is room for improvement in order to identify such situations.</p> <p>The impact on settlement is likely to be minor because the overall error is likely to be within the category limits.</p>	
Actions taken to resolve the issue		Completion date
The DELT ATH dispute this non-compliance. While the test results are over 1.5% they are under the maximum of 2.5% meaning the installations passed the tests and met the requirements for certification.		19-07-21
Preventative actions taken to ensure no further issues will occur		Completion date
The DELT ATH dispute this non-compliance. While the test results are over 1.5% they are under the maximum of 2.5% meaning the installations passed the tests and met the requirements for certification.		19-07-21
		Remedial action status
		Disputed

Test Results		
Non-compliance	Description	
<p>Audit Ref: 5.16</p> <p>With: Clause 10(1) &amp; (2) of Schedule 10.7</p> <p>From: 27-Feb-21</p> <p>To: 22-Jun-20</p>	<p>Three Cat 2 installations certified with errors greater than 1.5% meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate because there is room for improvement in order to identify such situations.</p> <p>The impact on settlement is likely to be minor because the overall error is likely to be within the category limits.</p>	
Actions taken to resolve the issue		Completion date
The DELT ATH dispute this non-compliance. While the test results are over 1.5% they are under the maximum of 2.5% meaning the installations passed the tests and met the requirements for certification.		19-07-21
Preventative actions taken to ensure no further issues will occur		Completion date
The DELT ATH dispute this non-compliance. While the test results are over 1.5% they are under the maximum of 2.5% meaning the installations passed the tests and met the requirements for certification.		19-07-21
		Disputed



Statistical Sampling			
Non-compliance	Description		
<p>Audit Ref: 5.26</p> <p>With: Clause 16 of Schedule 10.7</p> <p>From: 19-Oct-20</p> <p>To: 22-Jun-21</p>	<p>The samples not representative of the groups of meters certified using the statistical recertification method for three of four recertification projects.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>I have rated the controls as weak because the Delta process did not ensure the samples were representative.</p> <p>The impact could be significant, as it is likely that inaccurate metering installations have been recertified. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The DELT ATH are provided the population by the MEP. EIPC Clause 16 of Schedule 10.7 Part 15 states the MEP is responsible for defining the group(population). Delta then randomly select the sample based on EIPC Clause 16 of Schedule 10.7 Part 23. The DELT ATH consider manipulation of the sample in any way to clash with the requirement of a random selection so the consideration of the sample being representative of the group is unattainable without changing the group itself. Therefore, the more realistic control here would be to ensure the group is going to be able to be representable by a randomly selected sample regardless of the meters that are randomly selected. This is the MEP's responsibility.</p> <p>This considered the DELT ATH will now be insisting on meter types being provided and performing a deeper analysis of the representativeness of the group. The DELT ATH will refuse to sample groups that cannot be considered representative with a randomly selected un-manipulated sample.</p>		19-07-21	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>The DELT ATH are provided the population by the MEP. EIPC Clause 16 of Schedule 10.7 Part 15 states the MEP is responsible for defining the group(population). Delta then randomly select the sample based on EIPC Clause 16 of Schedule 10.7 Part 23. The DELT ATH consider manipulation of the sample in any way to clash with the requirement of a random selection so the consideration of the sample being representative of the group is unattainable without changing the group itself. Therefore, the more realistic control here would be to ensure the group is going to be able to be representable by a randomly selected sample regardless of the meters that are randomly selected. This is the MEP's responsibility.</p> <p>This considered the DELT ATH will now be insisting on meter types being provided and performing a deeper analysis of the representativeness of the group. The DELT ATH will refuse to sample groups that cannot be considered representative with a randomly selected un-manipulated sample.</p>	<p>19-07-21</p>	
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Error Calculation		
Non-compliance	Description	
Audit Ref: 5.30 With: Clause 22 Of Schedule 10.7  From: 03-Feb-21 To: 22-Jun-21	Uncertainty not correctly accounted for in three category 2 comparative recertifications. Error not correctly recorded for seven category 2 comparative recertifications. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because there is room for improvement in order to identify such situations. The impact on settlement is likely to be minor because the overall error is likely to be within the category limits.	
Actions taken to resolve the issue		Completion date
Each of these certs has had the error and uncertainty analysed to ensure that the correct results would not cause failure. The overall error is within category limits, so no further action is required.		30-08-21
Preventative actions taken to ensure no further issues will occur		Completion date
Spreadsheet has been modified highlighting the cells in which technicians are to enter the test results which was being missed. Cells have been locked to ensure data/formulas which should not be touched are not being touched. These controls will prevent future occurrences.		30-08-21
		Identified