

## Compliance Plan for Wells Class B ATH – May 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: 13-May-21</p>	<ol style="list-style-type: none"> <li>1) Each services access interface and metering installation type not recorded for 47 of 76 metering installations certified since 1/02/21.</li> <li>2) Maximum interrogation cycle not recorded for each services access interface in 68 metering installations.</li> <li>3) Certification expiry date incorrectly calculated for one category 2 metering installation.</li> <li>4) One category 1 metering installation certified using the selected component method had the method incorrectly recorded on the certification report as comparative recertification.</li> </ol> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 they mitigate risk most of the time but there is room for improvement.</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		Remedial action status

1) This item is related to the code changes of the 1 <sup>st</sup> Feb and the practicality of achieving all that was required in the timeframe as has been articulated by the auditor in various sections of this audit report and in Well's overall response in the final section of this audit report.	Completed	Cleared
2) This is an item which was required to conform to the code changes of the 1st Feb 2021.  It is acknowledged that the changes incorporated within our workflows may not have covered the full requirements and this is now being addressed to ensure full conformance with the code.	25 <sup>th</sup> June 2021	Identified
3) The Certification Documentation will be updated, and the MEP will be requested to change the Certification expiry date till 10 years after the Electrical Connection of the installation (from 25 <sup>th</sup> Jan 2021).	11 <sup>th</sup> June 2021	Identified
4) The Certification Documentation will be updated, and the MEP will be requested to change the Certification to selected component method.	11 <sup>th</sup> June 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
1) The workflow was changed on the 28 <sup>th</sup> Jan 2021 and all tasks initiated and inputted into our metering system from that date onwards comply with this requirement.	Completed	
2) Wells will investigate how the provision of the Maximum Interrogation Period for multiple Service Access Interfaces will be addressed.	25 <sup>th</sup> June 2021	
3) Cease undertaking Cat 2 Metering tasks for this MEP until assurances are received that they will provide accurate information and fully conform to the EIPC requirements when issuing Wells with metering tasks	4 <sup>th</sup> June 2021	
4) Ensure that it is clearly stipulated that the certification method is not changed by our compliance conformance team without appropriate consultation with the technician involved and full consideration is given to the overarching situation.	4 <sup>th</sup> June 2021	

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: 12-Apr-21</p>	<p>Each services access interface and metering installation type not recorded for 47 of 76 metering installations certified since 1/02/21.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as strong as the Wells processes have been updated to record each services access interface and installation type.</p> <p>There is no impact because the MEP normally determines the location of the services access interface and metering installation type; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
This item is related to the code changes of the 1 <sup>st</sup> Feb and the impracticality of achieving all that was required and incorporating the additional requirements in tasks that were already 'in flow' in the timeframe as has been notated by the auditor in various sections of this audit report and more extensively in Well's overall response in the final section of this audit report.		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Wells will review the changes made to all workflows to facilitate the 1 Feb 2021 code changes to ensure that all the requirements of this subclause have been fulfilled.		30 <sup>th</sup> June 2021	

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: 12-Apr-21</p>	<p>Each services access interface not recorded for 47 of 76 metering installations certified since 1/02/21.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as strong as the Wells processes have 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
This item is related to the code changes of the 1 <sup>st</sup> Feb and the impracticality of achieving all that was required and incorporating the additional requirements in tasks that were already 'in flow' in the timeframe as has been notated by the auditor in various sections of this audit report and more extensively in Well's overall response in the final section of this audit report		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Wells will review the changes made to all workflows to facilitate the 1 Feb 2021 code changes to ensure that all the requirements of this subclause have been fulfilled.		30 <sup>th</sup> June 2021
		Cleared

Certification at a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 3.10</p> <p>With: Clause 6(4) Of Schedule 10.7</p> <p>From: 03-Feb-21</p> <p>To: 18-Feb-21</p>	<p>All information regarding lower category certification not included in the certification reports for three metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>I have recorded the controls as moderate because there is room for improvement.</p> <p>The impact is moderate because if the MEP does not monitor load each month certification will be cancelled; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
Our understanding was that there is a requirement for MEPs to monitor loads of all installations to ensure that the category limit is not exceeded. Wells was not of the understanding that there is a requirement to advise the MEP to undertake this activity, but this will be investigated further.		30 <sup>TH</sup> June 2021
Preventative actions taken to ensure no further issues will occur		Completion date
Wells will however carry out an investigation on this matter and as to how it might provide such advice to MEP's in the future.		31 July 2021
		Investigating

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 36(3) &amp; (4) of Schedule 10.7</p> <p>From: 19-Oct-20</p> <p>To: 01-Dec-20</p>	<p>Maximum interrogation cycle not recorded for each services access interface in 68 metering installations.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>This is an item which was required to conform to the code changes of the 1<sup>st</sup> Feb 2021.</p> <p>It is acknowledged that the changes incorporated within our workflows may not have covered the full requirements and this is now being addressed to ensure full conformance with the code.</p>		25 <sup>th</sup> June 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Wells will investigate how the provision of the Maximum Interrogation Period for multiple Service Access Interfaces will be addressed.</p>		25 <sup>th</sup> June 2021
		Identified

ATH must not Certify Metering Installations under certain circumstances			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 8(1) Of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 13-May-21</p>	<p>Six category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>ICP 0000015643TR39C had an absolute error and uncertainty test result of 1.54%, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</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 could be moderate, and the impact on MEPs is moderate because certification is cancelled, leading to non-compliance for the MEP in addition to non-compliance for Wells; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Wells recognises and accepts the six sites identified during the audit have been certified with the in-service burden lower than the burden range of the CTs and as a result, the site certification is invalid and therefor cancelled.</p> <p>To remedy these sites, Wells will reattend and retest the sites, bring the burden up to within the acceptable range and then once all tests are complete, certify the sites.</p>		30 June 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Wells will also carry out further investigation into CT Burdening with the manufacturer to address a possible ambiguity with the understanding of which CTs are recognised as having proven low burden accuracy.</p>		30 June 2021	

Certification Tests			
Non-compliance	Description		
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 13-May-21</p>	<p>Meter register not incrementing when raw meter date tests conducted on Intellihub Elster gRex meters.</p> <p>Potential impact: None</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 with regard to these meter types as the process does not always ensure that the testing requirements are met. The requirement is met for all other MEPs.</p> <p>There is no impact as the MEP has confirmed that the meter register will increment when the meter pulses; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This requirement has now been identified as having not been included in the workflows modified prior to the 1<sup>st</sup> Feb 2021 code changes. We accept that we have not been complying with this requirement where the EA had previously granted approval for certain meters (Elstra gRex owned by Intellihub) not need to have an 'actual' register advancement. The requirement to now carry out a test to ensure that the register has advanced by at least "1" in the least significant digit effectively means that this will be able to be achieved by undertaking the full register advancement check as is undertaken for other meters.</p>		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The requirement to fulfill this has now been put into place.		Completed	



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: 01-Feb-21</p> <p>To: 13-May-21</p>	<p>Six category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>ICP 0000015643TR39C had an absolute error and uncertainty test result of 1.54%, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are recorded as weak because they do not always identify instances of non-compliance prior to certification being applied.</p> <p>Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Wells recognises and accepts the six sites identified during the audit have been certified with the in-service burden lower than the burden range of the CTs and as a result, the site certification is invalid and therefore cancelled.</p> <p>To remedy these sites, Wells will reattend and retest the sites, bring the burden up to within the acceptable range and then once all tests are complete, certify the sites.</p>		30 June 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Wells will also carry out further investigation into CT Burdening with the manufacturer to address a possible ambiguity with the understanding of which CTs are recognised as having proven low burden accuracy.</p>		30 June 2021
		Identified

Selected Component - Circumstances where method may be used			
Non-compliance	Description		
<p>Audit Ref: 5.18</p> <p>With: Clause 11(4) of Schedule 10.7</p> <p>From: 03-Feb-21</p> <p>To: 13-May-21</p>	<p>Certification tests not completed at two metering installations certified using the selected component method.</p> <p>Potential impact: Low</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 certification tests are completed in most cases.</p> <p>The impact is likely to be low as certification tests had been carried out on the meters during previous certifications; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ol style="list-style-type: none"> <li>1) Wells acknowledges that the testing of the existing meters did not occur as it seems to be now required and will revisit the installation and carry out the require testing on all meters.</li> <li>2) Wells acknowledges that in following the MEP's clear instructions it failed to carry out the testing required. Once clarification has been provided as to whether a prevailing load test, as now stipulated in Table 3, or raw meter data output tests are required Wells will revisit the installation and carry out the required testing.</li> </ol>		<p>30<sup>th</sup> June 2021</p> <p>Within 10 days of clarification of requirements is received.</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ol style="list-style-type: none"> <li>1) Provide further clarification and training throughout Wells as to what is now required.</li> <li>2) Provide clarification as to what is required once this has been received and, should a Prevailing Load Test be required, then propose to the MEP that it will be preferable to change the meters rather than carrying out the new requirements on a 'recertify and reseal" task</li> </ol>		<p>30<sup>th</sup> June 2021</p> <p>Within 10 days of clarification of requirements is received.</p>	

Comparative Recertification – Circumstances where method may be used			
Non-compliance	Description		
<p>Audit Ref: 5.19</p> <p>With: Clause 12(2) of Schedule 10.7</p> <p>From: 10-Feb-21</p> <p>To: 13-May-21</p>	<p>Incorrect use of comparative recertification method for one installation.</p> <p>Potential impact: Low</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>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NB: The installation had not been previously certified by Wells or any other ATH as has been claimed by the MEP.</p> <p>The Certification Documentation will be updated, and the MEP will be requested to change the Certification expiry date till 10 years after the Electrical Connection of the installation (from 25<sup>th</sup> Jan 2020)</p>		11 June 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Cease undertaking Cat 2 Metering tasks for this MEP until assurances are received that they will provide accurate information and fully conform to the EIPC requirements when requesting that Wells undertake metering tasks for them.		4 <sup>th</sup> June 2021	

Certification Validity Periods			
Non-compliance	Description		
<p>Audit Ref: 5.28</p> <p>With: Clause 17 of Schedule 10.7</p> <p>From: 10-Feb-21</p> <p>To: 13-May-21</p>	<p>Certification expiry date incorrectly calculated for one category 2 metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NB: The installation had not been previously certified by Wells or any other ATH contrary to what the MEP may have claimed.</p> <p>The Certification Documentation will be updated, and the MEP will be requested to change the Certification expiry date till 10 years after the Electrical Connection of the installation (from) 25<sup>th</sup> Jan 2020).</p>		11 <sup>th</sup> June 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Cease undertaking Cat 2 Metering tasks for this MEP until assurances are received that they will provide accurate information and fully conform to the EIPC requirements when requesting that Wells undertake metering tasks for them.</p>		4 <sup>th</sup> June 2021	

Determine Metering Installation Certification Expiry Date			
Non-compliance		Description	
<p>Audit Ref: 5.34</p> <p>With: Clause 27(1) &amp; (2) Of Schedule 10.7</p> <p>From: 10-Feb-21</p> <p>To: 13-May-21</p>		<p>Certification expiry date incorrectly calculated for one category 2 metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating		Rationale for audit risk rating	
<b>Low</b>		<p>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NB: The installation had not been previously certified by Wells or any other ATH contrary to what the MEP may have claimed.</p> <p>The Certification Documentation will be updated, and the MEP will be requested to change the Certification expiry date till 10 years after the Electrical Connection of the installation (from the 25<sup>th</sup> Jan 2020).</p>		11 <sup>th</sup> June 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Cease undertaking Cat 2 Metering tasks for this MEP until assurances are received that they will provide accurate information and fully conform to the EIPC requirements when requesting that Wells undertake metering tasks for them.		4 <sup>th</sup> June 2021	

Measuring Transformers used in a Certified Metering Installation			
Non-compliance	Description		
<p>Audit Ref: 5.37</p> <p>With: Clause 28(4) Of Schedule 10.7</p> <p>From: 10-Feb-21</p> <p>To: 13-May-21</p>	<p>Six category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>Potential impact: Low</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>There is a process to install burden resistors, but it is not applied to all current transformers therefore the controls are moderate.</p> <p>The impact on settlement is likely to be minor because the overall error of the installations is measured and recorded.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Wells recognises and accepts the six sites identified during the audit have been certified with the in-service burden lower than the burden range of the CTs and as a result, the site certification is invalid and therefor cancelled.</p> <p>To remedy these sites, Wells will reattend and retest the sites, bring the burden up to within the acceptable range and then once all tests are complete, certify the sites.</p>		30 <sup>th</sup> June 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Wells will also carry out further investigation into CT Burdening with the manufacturer to address a possible ambiguity with the understanding of which CTs are recognised as having proven low burden accuracy.</p>		30 <sup>th</sup> June 2021	

Measuring Transformer Certification Expiry Date			
Non-compliance	Description		
<p>Audit Ref: 5.38</p> <p>With: Clause 29 of Schedule 10.7</p> <p>From: 10-Feb-21</p> <p>To: 13-May-21</p>	<p>CT certification expiry dates incorrectly calculated for one category 2 metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NB: The installation had not been previously certified by Wells or any other ATH as has been claimed by the MEP.</p> <p>The Certification Documentation will be updated, and the MEP will be requested to change the Certification expiry date till 10 years after the Electrical Connection of the installation (from the 25<sup>th</sup> Jan 2020).</p>		11 <sup>th</sup> June 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Cease undertaking Cat 2 Metering tasks for this MEP until assurances are received that they will provide accurate information and fully conform to the EIPC requirements when requesting that Wells undertake metering tasks for them.</p>		4 <sup>th</sup> June 2021	

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 Of Schedule 10.7</p> <p>From: 10-Feb-21</p> <p>To: 13-May-21</p>	<p>Six category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>There is a process to install burden resistors, but it is not applied to all current transformers therefore the controls are moderate.</p> <p>The impact on settlement is likely to be minor because the overall error of the installations is measured and recorded.</p>	
Actions taken to resolve the issue		Completion date
<p>Wells recognises and accepts the six sites identified during the audit have been certified with the in-service burden lower than the burden range of the CTs and as a result, the site certification is invalid and therefor cancelled.</p> <p>To remedy these sites, Wells will reattend and retest the sites, bring the burden up to within the acceptable range and then once all tests are complete, certify the sites.</p>		30 <sup>th</sup> June 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Wells will also carry out further investigation into CT Burdening with the manufacturer to address a possible ambiguity with the understanding of which CTs are recognised as having proven low burden accuracy.</p>		30 <sup>th</sup> June 2021
		Identified



Measuring Transformer Certification			
Non-compliance	Description		
<p>Audit Ref: 5.67</p> <p>With: Clause 3 of Schedule 10.8</p> <p>From: 01-Feb-21</p> <p>To: 13-May-21</p>	<p>Burden range not recorded in CT certification reports for two metering installations.</p> <p>Incorrect burden ranges recorded for nine category 2 metering installations.</p> <p>Seven category 2 metering installations with CTs certified without calibration being carried out.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded that the controls are moderate as Wells has updated it's processes to record burden ranges but the range is not always correct, the process to certify CTs during comparative recertification has been amended recently.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ol style="list-style-type: none"> <li>1) The Burden range will be recorded and provided to the MEP for the two installations which this did not occur.</li> <li>2) The recorded burden range will be corrected, and the corrected data supplied to the MEP for the eight installations with TWS 500/5 CTs to 0-5 VA. The Installation with the TWS 300/5 CTs which falls outside of the acceptable range will be revisited, tested and the required burdening resistors installed as appropriate to meet the audited outcome.</li> <li>3) Wells will look to further highlight the fact that when undertaking Comparative Recertification CT's are not necessarily certified and should not have a certification sticker applied when undertaking such recertification.</li> </ol>		<p>4<sup>th</sup> June 2020</p> <p>0001410819UNDF0 Recertified 30<sup>th</sup> June 2020</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<ol style="list-style-type: none"> <li>1) Wells will carry out further training to ensure that all Cat 2 and above technicians are aware of the need to input the Recorded Burden Range.</li> <li>2) Wells will carry out further training to ensure that all Cat 2 and above technicians are aware of the need to be accurate input the Recorded Burden Range.</li> <li>3) Wells will carry out further training to ensure that all Cat 2 and above technicians are aware of the fact that they are not to affix certification stickers to CT's when carrying out Comparative Certification.</li> </ol>	4 <sup>th</sup> June 2020	
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Measuring Transformers in service burden range			
Non-compliance	Description		
<p>Audit Ref: 5.68</p> <p>With: Clause 2(1)(E) Of Schedule 10.8</p> <p>From: 01-Feb-21</p> <p>To: 13-May-21</p>	<p>Burden range not recorded in CT certification reports for two metering installations.</p> <p>Incorrect burden ranges recorded for nine category 2 metering installations.</p> <p>Potential impact: Low</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>I have recorded that the controls are moderate as Wells has updated its processes to record burden ranges, but the range is not always correct.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<ol style="list-style-type: none"> <li>1) The Burden range will be recorded and provided to the MEP for the two installations which this did not occur.</li> <li>2) The recorded burden range will be corrected, and the corrected data supplied to the MEP for the eight installations with TWS 500/5 CTs to 0-5 VA. The Installation with the TWS 300/5 CTs which falls outside of the acceptable range will be revisited, tested and the required burdening resistors installed as appropriate to meet the audited outcome.</li> </ol>		<p>4<sup>th</sup> June 2020</p> <p>0001410819UNDF0 Recertified 30<sup>th</sup> June 2020</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ol style="list-style-type: none"> <li>1) Wells will carry out further training to ensure that all Cat 2 and above technicians are aware of the need to input the Recorded Burden Range.</li> <li>2) Wells will carry out further training to ensure that all Cat 2 and above technicians are aware of the need to be accurate in inputting the Recorded Burden Range.</li> </ol>		4 <sup>th</sup> June 2020	

Investigation of Faulty Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 10.43(3) of Part 10</p> <p>From: 01-Feb-20</p> <p>To: 13-May-21</p>	<p>MEP was not notified that six metering installations with the in-service burden lower than the burden range of the CTs are not fit for purpose and therefore have cancelled certification.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are recorded as moderate because there is room for improvement in order to identify and report on such situations.</p> <p>The impact on settlement could be moderate and the impact on MEPS is moderate because certification is cancelled, leading to non-compliance for the MEP in addition to non-compliance for Wells; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Wells recognises that the auditor has raised the fact that the six sites identified during the audit have been certified with the in-service burden lower than the burden range of the CTs and as a result, the site certification is invalid and therefor cancelled. Wells will therefor notify the MEPS.</p> <p>To address what has been raised, Wells will look to review the certification documents against the return to site and retest the metering installations, bring the burden up to within the range which has been indicated is required and then once all tests are complete, certify the sites.</p>		31 July 2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Wells will also carry out further investigation into CT Burdening with the manufacturer to address a possible ambiguity with the understanding of which CTs are recognised as having proven low burden accuracy.</p>		30 <sup>th</sup> June 2021
		Identified