

Electricity Industry Participation Code Audit Report

For



Class B Approved Test House

Prepared by Steve Woods – Veritek Limited

Date of Audit: 15/11/18

Date Audit Report Complete: 06/12/18

Date Audit Report Due: 08/12/18

Executive Summary

Wells is a Class B Approved Test House and this audit was performed at their request, to encompass the Electricity Industry Participation Code (Code) requirement for an audit, in accordance with clause 2 of schedule 10.3.

The Authority had stipulated that the next audit was due by 08 December 2018, in accordance with clause 1(4)(c) of schedule 10.3.

The audit report records 13 non-compliances in relation to three main areas, as follows:

1. Whilst error and uncertainty calculations for category 2 comparative certification are now being conducted in accordance with the requirements of the Code, the audit found that 11 of 23 certification reports showed uncertainty figures greater than 0.6%. Whilst the total error was within 2.5%, the Code also contains a threshold for uncertainty. The Code also states that these installations are deemed to be “inaccurate” leading to cancellation of certification and requiring notification to the MEPs. The metering installation certification reports lack the required clarity to easily identify the error and uncertainty results and whether the installations have passed or failed the certification tests.
2. Wells has not confirmed the accuracy of non-TWS CTs when the in-service burden is lower than the lowest test point recorded in the IEC standard. A process has been developed for installing burden resistors, but this was not used for five of seven installations checked during the audit. The process used is not considered compliant because the resistors are installed at the test facility, which means it cannot be used for its stated purpose.
3. The maximum interrogation cycle is not always recorded in certification reports.

Six recommendations are made. Three are in relation to the lack of clarity with metering installation certification reports. The most important recommendation is that Wells engage with the Measurement Standards Laboratory (MSL), to develop a robust and enduring measurement uncertainty management capability for Category 2 metering installations.

During the previous audit it was found that ICP 0005170923RN2E6 was comparative certified on 02/03/16 for two years, despite a measured error of 32.39% fast. The certification report was provided to the MEP and I notified both the Trader and MEP that remedial action was required. This installation has still not been recertified and I have notified the Trader and MEP again. This installation has now been over recording for 32 months.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table below provides some guidance on this matter and recommends a next audit frequency of three months. I recommend a nine month audit period to provide enough to resolve the matters identified, because new processes need to be established and some metering installations will require recertification.

The matters found are shown in the tables below:

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Accurate information	2.2	10.6 of Part 10	Maximum interrogation cycle not recorded for 6 of 38 records. Category 2 certification reports do not record error and uncertainty calculations with enough clarity to be able to determine whether the tests have passed or failed.	Moderate	Medium	4	Identified
ATH record keeping	3.7	12(2)(a) of Schedule 10.4	Category 2 comparative certification records not sufficiently detailed to enable verification of all aspects of all tests carries out.	Moderate	Medium	4	Identified
Maximum interrogation cycle	3.11	26(4) of Schedule 10.7	Maximum interrogation cycle not recorded for 6 metering installations.	Weak	Low	3	Identified
Maximum interrogation cycle	3.14	36(3) of Schedule 10.7	Maximum interrogation cycle not recorded for 6 metering installations.	Weak	Low	3	Identified
Compliance with part 10	5.1	8(1) Of Schedule 10.7	11 Category 2 metering installations certified with uncertainties greater than 0.6%. 5 Category 2 metering installations certified with burden lower than 25% of the rated burden.	Moderate	Medium	4	Identified

Subject	Section	Clause	Non-compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Raw meter data output test	5.15	9(2) of Schedule 10.7	11 Category 2 metering installations certified with uncertainties greater than 0.6%.	Moderate	Medium	4	Identified
Test results	5.16	10(1)&(2) Of Schedule 10.7	11 Category 2 metering installations certified with uncertainties greater than 0.6%.	Moderate	Medium	4	Identified
Comparative tests	5.20	12(3) Of Schedule 10.7	11 Category 2 metering installations certified with uncertainties greater than 0.6%.	Moderate	Medium	4	Identified
Metering installation accuracy	5.29	21 of Schedule 10.7	11 Category 2 metering installations certified with uncertainties greater than 0.6%.	Moderate	Medium	4	Identified
Error calculation	5.30	22 Of Schedule 10.7	Some uncertainty results greater than 0.6%.	Weak	Medium	6	Identified
Test facility	5.37	28(4)(a)(i) of Schedule 10.7	Test facility, meeting the definition of a test facility, not always installed.	Moderate	Low	2	Disputed
Low burden	5.40	31 Of Schedule 10.7	5 installations had low burden and burden resistors were not installed.	Moderate	Low	2	Identified

Subject	Section	Clause	Non-compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Notification of metering installations inaccurate or not fit for purpose	7.2	10.43(3) of Part 10	MEP not notified that 11 metering installations with measurement uncertainty greater than 0.6% are inaccurate and therefore have certification cancelled. MEP not notified that five metering installations with low burden are not fit for purpose and therefore have cancelled certification.	Moderate	Medium	4	Identified
Future Risk Rating						48	
Indicative Audit Frequency						3 months	

Future risk rating	1-3	4-6	7-8	9-17	18-26	27+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Remedial Action
Certification & Calibration Reports	3.6	11(1) of Schedule 10.4	Change the layout of the certification report to include the more relevant items clearly on the front page.	Identified
ATH record keeping	3.7	12(2)(a) of Schedule 10.4	Change the metering installation certification report to include the "original" burden result and an "after" burden result once burden resistance has been added.	Identified
Certification method	5.9	7(1) Of Schedule 10.7	Record the certification method in certification reports.	Identified

Subject	Section	Clause	Recommendation for improvement	Remedial Action
Error calculation	5.30	22 of Schedule 10.7	Engage with MSL to develop a robust and enduring measurement uncertainty calculation methodology.	Identified
Low burden	5.40	31 Of Schedule 10.7	Include checks of burden levels and whether resistors have been added to the photo checking process.	Identified
Warning sticker	5.49	42 of Schedule 10.7	Develop a CT chamber warning sticker.	Identified

Persons Involved in This Audit

Auditor:

Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Wells personnel assisting in this audit were:

Name	Title
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Saju Kuriakose	Business Improvement Manager

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1.	We acknowledge that at the time of the Cat-2 installation certifications in question, error and uncertainty was, for some working standards, being shown as greater than 0.6%, and there was no flag to the technician that certification should not proceed. Subsequent refinements to the working standard certification reports and the use of the figures contained within them for the calculation of site certification error and uncertainty have shown them to actually be safely below 0.6%.	88
	Modifications to the workflows and reports are being initiated to both better illustrate to the technician if the temperature adjusted value increases above 0.6%, and to prevent the certification process from proceeding under these conditions.	88
	As a side-note, we are a little perplexed at how over half of the risk rating points are due to an issue that was not going to result in inaccurate installations, with the overall site error requirement still being met, and where the root cause of the issue was purely a numeric issue that has already been addressed, as indicated in the table above.	88

1. ADMINISTRATIVE

1.1 Exemptions from Obligations to Comply With Code (Section 11 of Electricity Industry Act 2010)

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

I checked the Authority's website for any relevant exemptions.

Audit commentary

There are no exemptions in place.

1.2 Scope of Audit

Wells is a Class B ATH and this audit was performed at their request, to encompass the Electricity Industry Participation Code requirement for an audit, in accordance with clause 2 of schedule 10.3.

The Authority has stipulated that the next audit was due by 08 December 2017, in accordance with clause 1(4)(c) of schedule 10.3.

The audit was conducted in accordance with the ATH Audit Guidelines V1.2 produced by the Electricity Authority.

Wells wishes its ATH approval to include the following functions of Clauses 3(2) 4(2) of Schedule 10.3:

Class B Approval

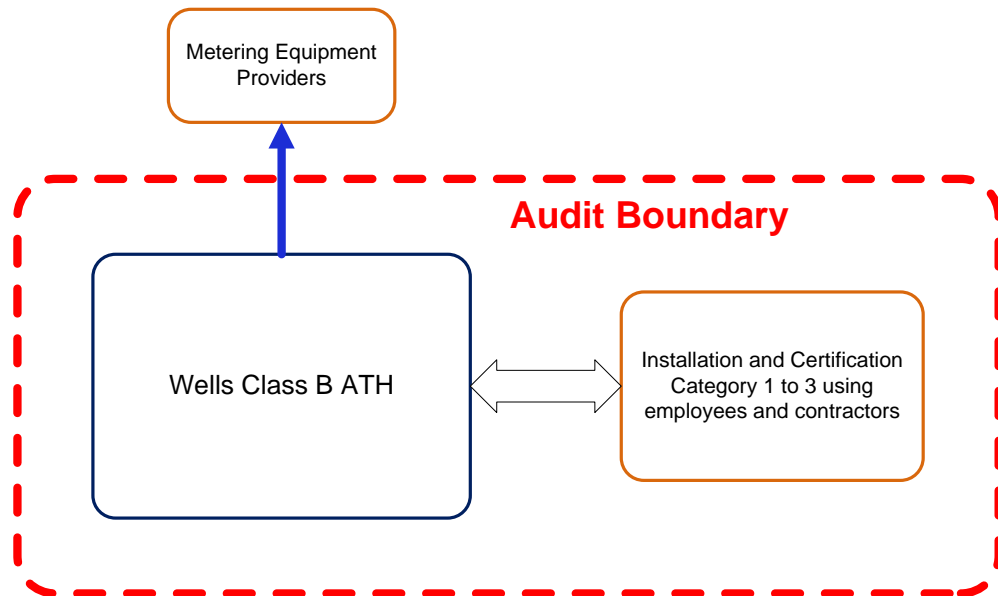
- (a) calibration of class 0.5 meters, class 1 meters and class 2 meters, and class 0.5 current transformers and class 1.0 current transformers, provided that the calibrations are carried out under their approved quality certification and in accordance with this Part, and included within the ATH audit for approval:
- (b) installation and modification of metering installations:
- (c) installation and modification of metering components:
- (d) calibration of metering components on site:
- (e) certification, using the selected component certification method, of:
 - (i) category 1 metering installations:
 - (ii) category 2 metering installations:
 - (iii) category 3 metering installations with a primary voltage of less than 1kV:
- (f) certification, using the fully calibrated certification method, of—
 - (i) category 1 metering installations:
 - (ii) category 2 metering installations:
 - (iii) category 3 metering installations with a primary voltage of less than 1kV:
- (g) certification, using the comparative recertification method, of category 2 metering installations:
- (h) issuing of certification reports in respect of certifications of metering installations under paragraphs (e) to (g):
- (i) inspection of:
 - (i) category 1 metering installations:
 - (ii) category 2 metering installations:

(iii) category 3 metering installations with a primary voltage of less than 1kV.

Wells also requires approval to certify metering components. I note that the Class B functions listed in Clause 4(2) of Schedule 10.3 do not include certification of metering components.

Wells provides Test House services to metering equipment owners in respect of the installation and/or re-certification of Category 1 to Category 3 metering. Wells provides training, and also conducts internal audits to ensure the on-going compliance and competence of employees and contractors.

The boundaries of this audit are shown below for greater clarity.



1.3 Previous Audit Results

The last audit was conducted in November 2017 by Steve Woods of Veritek. The audit found five non-compliance issues, and two recommendations were made. Non-compliance still exists for these clauses and the recommendations have not yet been adopted.

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Compliance with part 10	5.1	8(1) Of Schedule 10.7	ICP 0005170923RN2E6 was comparative certified on 02/03/16 for two years, despite non-compliance with part 10.	Certification expired, error still existing. 11 additional examples.
Test results	5.16	10(1)&(2) Of Schedule 10.7	ICP 0005170923RN2E6 was comparative certified on 02/03/16 for two years, despite a measured error of 32.39% fast.	Certification expired, error still existing. 11 additional examples.
Comparative tests	5.20	12(3) Of Schedule 10.7	ICP 0005170923RN2E6 was comparative certified on 02/03/16 for two years, despite a measured error greater than that prescribed in Table 1.	Certification expired, error still existing. 11 additional examples.
Error calculation	5.30	22 Of Schedule 10.7	Temperature variations not considered in uncertainty calculations. Some uncertainty results greater than 0.6%.	Temperature is considered but some uncertainty figures are still above 0.6%.
Low burden	5.40	31 Of Schedule 10.7	Wells has not confirmed the accuracy of non-TWS CTs when the in-service burden is lower than the lowest test point recorded in the IEC standard.	Still existing.

Table of Recommendations

Subject	Section	Clause	Recommendation for improvement	Status
Certification & Calibration Reports	3.6	11(1) of Schedule 10.4	Change the layout of the certification report to include the more relevant items clearly on the front page.	Still existing
Certification method	5.9	7(1) Of Schedule 10.7	Record the certification method in certification reports.	Still existing

2. ATH REQUIREMENTS

2.1 Use of Contractors (Clause 10.3 of Part 10)

Code related audit information

A participant may perform its obligations and exercise its rights under this Part by using a contractor. A participant who uses a contractor to perform the participant's obligation under this Part remains responsible and liable for, and is not released from, the obligation, or any other obligation under this Part.

Audit observation

I checked Wells understands of this requirement by conducting a walk-through of contractor and employee management processes. I checked the audit regime in place to ensure contractors and employees are competent and are following Wells' instructions.

Audit commentary

Wells uses employees and contractors to conduct field activities. All technicians are subject to the same training and monitoring program, which includes initial training by a specialised trainer followed by two days of fieldwork with a "buddy", at least one "live" audit per year and on-going monitoring of site photos and records. I checked the competency records to ensure they were complete and accurate. The competency matrix is up to date and recognises different levels of competence for different job types.

The training program also includes health and safety and electricity regulation responsibilities.

Audit outcome

Compliant

2.2 Provision of Accurate Information (Clause 10.6 of Part 10)

Code related audit information

A participant must take all practicable steps to ensure that information that it provides under this Part is:

- *complete and accurate*
- *not misleading or deceptive*
- *not likely to mislead or deceive.*

If a participant, having provided information under this Part, becomes aware that the participant has not complied with these requirements, the participant must, except if clause 10.43 applies, as soon as practicable provide such further information, or corrected information, as is necessary to ensure that the participant complies.

Audit observation

I checked compliance with this clause at the end of the audit to determine whether compliance had been achieved.

Audit commentary

As mentioned in **section 3.1**, the photo checking process also checks the accuracy of recorded details, including meter readings and tariffs. If any discrepancies are identified the record can be sent back to the technician's PDA so they can make the correction to the source data. The checking process occurs on a daily basis and generally meets the requirement to ensure data is corrected "as soon as practicable".

It appears there are some gaps in the checking process. Three issues were identified during the audit but not during the checking process. The issues are as follows:

1. 6 of 38 certification reports did not have the maximum interrogation cycle recorded.
2. 5 of 23 Category 2 reports contained burden figures that were too low and burden resistors were not installed. This is not considered non-compliance with this clause but is recorded as non-compliance in **section 5.40**.
3. 10 of 23 Category 2 reports contained uncertainty figures that were greater than 0.6%. The certification reports are not sufficiently clear for this to be easily identified. I had to conduct separate calculations to determine these figures. This matter is discussed further in **sections 3.7 and 5.30**.

In addition to the points raised above, I recommend the certification report template is changed to ensure better clarity and to ensure relevant information is on the front page. This recommendation is made in **section 3.6**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.2 With: Clause 10.6 of Part 10 From: 01-Dec-17 To: 17-Nov-18	Maximum interrogation cycle not recorded for 6 of 38 records. Category 2 certification reports do not record error and uncertainty calculations with enough clarity to be able to determine whether the tests have passed or failed. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. There is a moderate impact on MEPs and Traders, because certification is cancelled for 10 of 23 metering installations and the reports did not have sufficient clarity for MEPs to be able to determine this. The MEP is therefore also non-compliant. The audit risk rating is Medium.		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>The installation certifications found to have no Maximum Interrogation Cycle entered can have the required value entered by our back office.</p> <p>It is not believed that anything can be done to retrospectively change what was viewable by the technician at the time of certification, because the modifications proposed to address this will not be applied to existing jobs</p>	<p>7-12-18</p> <p>-----</p>	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>The instances of this occurring were all on jobs performed under one or other of the two specific workflows, where the field was not setup as a mandatory requirement, as it is in other workflows. This will be changed to ensure that the technician must select a value for this field before the job can be completed.</p> <p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and so a modification to the relevant workflows and subsequent reports will be initiated</p>	<p>4-12-18</p> <p>28-12-18</p>	

2.3 Dispute Resolution (Clause 10.50(1) to (3) of Part 10)

Code related audit information

Participants must in good faith use best endeavours to resolve any disputes related to Part 10 of the Code. Disputes that are unable to be resolved may be referred to the Authority for determination. Complaints that are not resolved by the parties or the Authority may be referred to the Rulings Panel by the Authority or participant.

Audit observation

I checked whether any disputes had been dealt with by Wells during the audit period.

Audit commentary

Wells has not needed to resolve any disputes in accordance with these clauses.

Audit outcome

Compliant

2.4 ATH Approval (Clause 10.40 of Part 10)

Code related audit information

A person wishing to be approved as an ATH, or an ATH wishing to renew its approval, must apply to the Authority:

- *at least two months before the intended effective date of the approval or renewal*
- *in writing*
- *in the prescribed form*
- *in accordance with Schedule 10.3.*

A person making an application must satisfy the Authority (providing, where appropriate, suitable evidence) that the person:

- *has the facilities and procedures to reliably meet, for the requested term of the approval, the minimum requirements of this Code for the class or classes of ATH for which it is seeking approval*
- *has had an audit under Schedule 10.3*
- *is a fit and proper person for approval.*

Audit observation

I checked the most recent application for re-certification.

Audit commentary

Wells has appropriate approval and appropriate facilities and procedures to meet the minimum requirements of the Code.

Audit outcome

Compliant

2.5 ATH Requirements (Clause 10.41 of Part 10)

Code related audit information

An ATH must, when carrying out activities under this Part:

- *only carry out activities for which it has been approved by the Authority*
- *exercise a degree of skill, diligence, prudence, foresight, and economic management, taking into account the technological complexity of the metering components and metering installations being tested:*
 - *determined by reference to good industry practice*
 - *that would reasonably be expected from a skilled and experienced ATH engaged in the management and operation of an approved ATH*
- *comply with all applicable safety, employment, environmental, and other enactments*
- *exercise any discretion given to it under this Part by:*
 - *taking into account the relevant circumstances of the particular instance*
 - *acting professionally*
- *recording the manner in which it carried out its activities and its reasons for carrying the activities out in that manner.*

Audit observation

I checked policy and process documentation to confirm compliance with these clauses.

Audit commentary

Wells has only conducted activities that fall within the scope of their approval. I have concluded from this audit that Wells has met the requirements of this clause.

I checked compliance with other enactments, specifically the electricity regulations with regard to safety practices and I confirm the following critical points are managed in a robust manner:

- access to basic insulation
- live working practices, specifically polarity testing
- safety practices with regard to the management of asbestos switchboards - training for this includes an asbestos awareness presentation then a workshop trial followed by supervision on site
- general safety practices and the appropriate use and testing of personal protective equipment.

Audit outcome

Compliant

2.6 Quality Management Systems (Clauses 3(1) & 4(1) of Schedule 10.3)

Code related audit information

An ATH must establish, document, implement, maintain, and comply with a quality management system which records its processes and procedures to ensure compliance with this Part.

An applicant applying for approval or renewal of approval, as a class A ATH must, as part of its application, confirm that it holds and complies with AS/NZS ISO 17025 accreditation, for at least the requested term of the approval.

An applicant applying for approval, or renewal of approval, as a class B ATH must, as part of its application to the Authority, confirm that it holds and complies with AS/NZS ISO 9001:2008 or AS/NZS ISO 9001:2016 certification for at least the requested term of the approval.

Audit observation

I obtained and reviewed the most recent ISO report to confirm the scopes were appropriate and that certification was in place.

Audit commentary

Wells has ISO 9001:2008 registration for the Class B Test House. The scope is appropriate and is noted as:

“Installation of metering equipment. Commissioning and certifying of Category 1 - 3 metering installations under the provisions of the rules of the Electricity Industry Participation Code.

New Premises:

- *Single Phase whole current meters*
- *Three phase meters*

With CT or Without CT

Existing Premises:

- *In compliance (Trader change – Revenue Meter Replacement and /or reprogramming only)*
- *Meter change*

Prescribed electrical work in accordance with the Employer License provisions of Section 115 of the Act and Regulation 94 of the Electricity (Safety) Regulations 2010.

Wells provided a copy of their most recent ISO 9001:2008 audit report, dated March 2018, which was conducted by Telarc SAI Limited. Three non-conformances were recorded and 14 opportunities for improvement were identified. All matters are cleared or in progress.

The report had little relevance to the compliance responsibilities of the ATH because it had a heavy emphasis on ISO 14001 (environmental) and AS/NZS 4801 (health and safety). Whilst these matters are important, they seem to have been given more emphasis than ISO 9001.

All matters raised in the report relate to risk management, environmental or H&S issues. There were no findings and little commentary related to whether ISO 9001 is continuing to operate as intended.

Audit outcome

Compliant

2.7 Organisation and Management (Clause 15 of Schedule 10.4)

Code related audit information

An ATH must ensure that it has managerial staff who, unless otherwise permitted in the relevant approval, all have the authority and resources needed to discharge their duties; and the responsibilities, authority, and functional relationships of all its personnel are fully and accurately specified and recorded in the ATH's records.

An ATH must appoint a technical manager (however named) with overall responsibility for technical operations, who must have appropriate engineering qualifications and experience in the operation of an approved ATH; and a quality manager (however named), with responsibility for the quality management certification and the implementation of the quality management system.

Audit observation

I checked records in the quality manual to confirm compliance.

Audit commentary

An ATH must appoint a technical manager (however named) with overall responsibility for technical operations, who must have appropriate engineering qualifications and experience in the operation of an approved test house; and a quality manager (however named), with responsibility for the quality management certification and the implementation of the quality management system. Leith Robertson is appointed as Technical Manager and Saju Kuriakose is appointed as Quality Manager. Both have appropriate qualifications.

An ATH must ensure that all staff who perform or supervise work or activities regulated under this Part are technically competent, experienced, qualified, and trained for the functions they perform. I checked the training and competency assessment processes and I confirm compliance with this clause.

Audit outcome

Compliant

2.8 Document Processes and Procedures (Clause 16 Of Schedule 10.4)

Code related audit information

An ATH must establish, document, implement, maintain, and comply with a quality management system which records its processes and procedures.

Audit observation

I checked the Class B quality documentation and I reviewed the relevant ISO report.

Audit commentary

The quality management system meets the requirements of the Code.

Audit outcome

Compliant

2.9 Quality Standard Required for Field Work (Clause 17 Of Schedule 10.4)

Code related audit information

If a class A ATH arranges for another person to carry out field work, it must ensure that person is certified to the relevant AS/NZS ISO9001:2008 or AS/NZS ISO9001:2016 standard at all times while the person carries out the work.

Audit observation

Wells has not required other parties to carry out field work.

Audit commentary

Wells has not required other parties to carry out field work.

Audit outcome

Not applicable

2.10 Material Change Requirements (Clause 16A.11)

Code related audit information

If the ATH intends to make a material change to any of its facilities, processes, procedures, or the scope of the ATH's ISO accreditation is reduced, the ATH must arrange for an additional audit at least five business days before the change or reduction in scope take place.

Audit observation

Wells has not conducted any material changes.

Audit commentary

Wells has not conducted any material changes.

Audit outcome

Not applicable

2.11 Audit Required for ATH Approval (Clause 16A.12 and 16A.13)

Code related audit information

The ATH must provide an audit report to the Authority by the due date. If there are areas where compliance is not achieved, the ATH must also submit a compliance plan which specifies the actions that the ATH intends to address, any issues identified in the audit report and the time frames to complete those actions.

Audit observation

Wells is currently undergoing an audit and the report will be provided with a compliance plan.

Audit commentary

Wells is currently undergoing an audit and the report will be provided with a compliance plan.

Audit outcome

Compliant

2.12 Accommodation & Environment (Clause 1 of Schedule 10.4)

Code related audit information

An ATH must maintain a list of personnel who are authorised to access and use its laboratory and storage facilities and restrict access to its laboratory and storage facilities to:

- (i) the personnel specified*
- (ii) the Authority*
- (iii) an auditor conducting an audit*
- (iv) any other person who is, at all times, directly supervised by a member of personnel specified.*

Audit observation

Wells does not operate a laboratory function; their scope is limited to field installation work.

Audit commentary

Wells does not operate a laboratory function; their scope is limited to field installation work.

Audit outcome

Not applicable

2.13 Compensation Factors (Clause 8 of Schedule 10.4)

Code related audit information

If an ATH is approved to certify metering installations, the ATH must have a documented process for the determination of compensation factors.

Audit observation

I checked the documentation in relation to compensation factors.

Audit commentary

The documentation achieves compliance with the Code.

Audit outcome

Compliant

2.14 Metering Component Stickers (Clause 8(3) of Schedule 10.8)

Code related audit information

An ATH must ensure that a certification sticker is:

- *made of weather-proof material*
- *permanently attached*
- *filled out using permanent markings.*

Audit observation

I checked Wells' component stickers to confirm compliance.

Audit commentary

All component stickers are compliant with this clause.

Audit outcome

Compliant

2.15 Interference with Metering Installations (Clause 10.12)

Code related audit information

An ATH may not directly or indirectly interfere with a metering installation unless it is also the MEP or has been instructed to do so by the existing or gaining MEP for the installation.

Audit observation

I audited this clause by exception.

Audit commentary

I did not identify any interference by Wells during the audit.

Audit outcome

Compliant

3. METERING RECORDS AND REPORTS

3.1 Physical Location of Metering Installations (Clause 10.35 of Part 10)

Code related audit information

If it is not practical in the circumstances to locate the metering installation at the point of connection, the reconciliation participant must calculate the quantity of electricity conveyed through the point of connection using a loss compensation process approved by the certifying ATH.

If this occurs the ATH must record the calculation, measurements, and assumptions in the installation certification report.

Audit observation

I checked whether Wells had certified any installations with loss compensation.

Audit commentary

Wells has not been required to conduct any loss compensation calculations.

Audit outcome

Compliant

3.2 Metering Installation Type (Clause 8(2) of Schedule 10.7)

Code related audit information

The metering installation certification report must specify whether the installation is half hour or non-half hour metering. It must also record where the services access interface is.

Audit observation

I checked 38 certification reports to confirm compliance.

Audit commentary

All reports have a populated field for NHH/HHR and the location of the services access interface.

Audit outcome

Compliant

3.3 Record Metering Installation Category (Clause 8(4) Of Schedule 10.7)

Code related audit information

An ATH must record the category of the metering installation in the metering installation certification report.

Audit observation

I checked 38 certification reports to confirm compliance.

Audit commentary

All reports correctly recorded the metering category.

Audit outcome

Compliant

3.4 Calibration Test Points (Clause 7(7) Of Schedule 10.4)

Code related audit information

An ATH may select a test point other than those specified in the relevant standard listed in Table 5 of Schedule 10.1, or at a lower burden than specified in the standard, but must, if it does this, document its reasons for the selection of these test points in the calibration report.

Audit observation

I checked with Wells whether any different test points had been used.

Audit commentary

There were no different test points used other than those specified in the standards.

Audit outcome

Compliant

3.5 Services Access Interface (Clause 10 of Schedule 10.4)

Code related audit information

An ATH must, when preparing a metering installation certification report, determine, and record in the certification report, the location of the services access interface. The services access interface means the point, at which access may be gained to the services available from a metering installation, that is:

- recorded in the certification report by the certifying ATH for the metering installation*
- where information received from the metering installation can be made available to another person*
- where signals for services such as remote control of load (but not ripple control) can be injected.*

Audit observation

I checked the design reports and a sample of 38 certification records to confirm compliance.

Audit commentary

The location of the Services Access Interface is recorded in the certification report as required by this clause.

Audit outcome

Compliant

3.6 Certification & Calibration Reports (Clause 11(1) of Schedule 10.4)

Code related audit information

An ATH must, for each metering installation that it certifies, produce a certification report in accordance with Schedule 10.7. An ATH must, for each metering component:

- that it calibrates, produce a calibration report in accordance with Schedule 10.8*
- that it certifies, produce a certification report in accordance with Schedule 10.8.*

Audit observation

I requested a sample of 38 certification records to confirm compliance.

Audit commentary

I reviewed Wells' records for each MEP where they provide ATH services. Certification reports are produced for all installations; certification and calibration reports are produced for all components.

CTs are certified in accordance with the Code.

The certification reports are very difficult for other participants to read and understand. As noted in the last audit report, I recommend Wells changes the layout of the report to include the more relevant items clearly on the front page, as follows:

- ICP
- metering installation certification date
- metering installation certification expiry date
- metering category
- certification type (selected component, comparative, fully calibrated, alternative, low load, lower category)
- HHR or NHH
- compensation factor
- electrical connection date (if known and if the ATH is also the agent).

Recommendation	Description	Audited party comment	Remedial action
11(1) of Schedule 10.4	Change the layout of the certification report to include the more relevant items clearly on the front page.	It is agreed that this would be of benefit to readers of the report who are only interested in key certification details, and so a modification to the existing report to provide an “executive summary” on the front page will be initiated	Identified

Audit outcome

Compliant

3.7 ATH Record Keeping Requirements (Clause 12 of Schedule 10.4)

Code related audit information

The ATH must document and maintain its record keeping system for certificates, reports, and any other records. The records can be stored in any media, such as hard copy or electronically. The records should be stored in a manner that prevents deterioration or damage and that retrieval of a record cannot result in change or damage to the record. Electronic storage should be backed up.

The ATH must securely store all records, certificates, and reports and ensure that each metering installation is:

- uniquely identified
- sufficiently detailed to verify the tests carried out including test conditions, the test equipment used and the personnel carrying out the tests.

Audit observation

I checked the certification records for 38 metering installations along with the storage practices.

Audit commentary

Certification records are securely stored and uniquely identified.

As mentioned in **section 2.2**, the certification reports are not sufficiently clear to be able to determine the error and uncertainty results. Compliance is therefore not achieved with clause 12(2)(a), which requires that *“all ...records certificates and reports are sufficiently detailed to enable verification of all aspects of all tests it carries out ...”*

The certification reports do not clearly state the overall installation error and the overall uncertainty. The relevant part of the metering installation certification report is shown below, and it can be explained as follows:

The “Tolerance” field is calculated by taking the maximum permitted error (2.5%) minus the maximum permitted uncertainty (0.6%) minus the working standard (including clamps) error. In the example below this is 2.5 minus 0.6 minus 0.88 = 1.02. This is used by Wells as the maximum allowable error for the comparative test, excluding consideration of temperature. In this example the total uncertainty (working standard error) is 0.88% which is higher than the allowable 0.6%. This matter is discussed further in **sections 5.15** and **5.20**.

The next step in the calculation occurs following the comparative test and uses the tested error (difference between working standard kWh and kWh recorded by the meter) adjusted by the temperature coefficient of 0.03% per degree Celsius. The installation error can be derived by adding the “VALIDATION CHECK” to the tolerance, which gives a result of + 0.57%, which is recorded below as “Pre Post Read Result Value”.

The results need to be recorded as follows:

Total allowable error – 2.5%

Measured error (difference between metering installation and working standard)

Total uncertainty (including all sources of error, mainly the working standard and temperature)

Prevailing Load Test 1	Completed: 11 Apr 2018 11:47
Multiplier	40
Hioki Asset No	Set 3 - 500A
Tolerance	1.02
Hioki Connected Photo	YES
Pre Test Read	0.305
Temperature	11
Post Test Read	0.637
Seconds	1158
Equip Reading	13.208
VALIDATION CHECK (must be negative)	-0.45
Pre Post Read Result Value	0.57

The recording of burden for Category 2 comparative certification requires more clarity. I recommend the metering installation certification report is changed to include the “original” burden result and an “after” burden result once burden resistance has been added.

Recommendation	Description	Audited party comment	Remedial action
Regarding: Clause 12(2)(a) of Schedule 10.4	Change the metering installation certification report to include the "original" burden result and an "after" burden result once burden resistance has been added.	It is agreed that it would be of benefit to illustrate the improvement achieved by the addition of burden resistors, and so a modification to the relevant workflows and subsequent reports will be initiated	Identified

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 3.7</p> <p>With: Clause 12(2)(a) of Schedule 10.4</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>Category 2 comparative certification records not sufficiently detailed to enable verification of all aspects of all tests carries out.</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		
Medium	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The lack of clarity has led to installations being certified with uncertainties higher than those allowed by the Code, leading to cancellation of certification, which affects MEPs and Traders, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
It is not believed that anything can be done to retrospectively change what was viewable by the technician at the time of certification, because the modifications proposed to address this will not be applied to existing jobs		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and so a modification to the relevant workflows and subsequent reports will be initiated		28-12-18	

3.8 Retention of Records (Clause 13 of Schedule 10.4)

Code related audit information

The ATH must keep all records, certificates, and calibration reports for all components and installations certified for at least 48 months after the date of decommissioning.

Audit observation

I checked the certification records for 38 metering installations along with the storage practices.

Audit commentary

All records were available, and the content was correct. Records are stored indefinitely. I observed records from 2015 to confirm compliance.

Audit outcome

Compliant

3.9 Advise MEP of Records, Certificates or Reports for A Metering Installation (Clause 14 Of Schedule 10.4)

Code related audit information

The ATH must provide the MEP responsible for the metering installation with the record, certificate, or report for the metering installation within five business days of certification. The ATH must ensure the MEP receives the record. This can be either as an electronic copy or any other agreed format.

Audit observation

I checked the processes and KPIs in place to determine compliance.

Audit commentary

The targets in place are to provide 90% of records within one day of certification and 100% within two days. There are some instances where this is not achieved due to follow up activities in relation to specific sites. The Code actually requires the ATH to send records within five business days of creation of the record, not from the certification date. I have therefore concluded that compliance is achieved with this requirement because the record has not been “created” until all of the information is complete.

Wells confirmed that they are not acting as an agent to any MEPs for the storage of records.

Audit outcome

Compliant

3.10 Certification at a Lower Category (Clause 6(4) Of Schedule 10.7)

Code related audit information

If the ATH makes a determination to certify a metering installation at a lower category under clause 6 of Schedule 10.7, the certification report must include all information required to demonstrate compliance.

Audit observation

I checked the process for certification as a lower category. There were no specific examples to view.

Audit commentary

Wells has processes to certify as a lower category. Some installations have been certified in accordance with these clauses prior to this audit period and they are all HHR installations, allowing the MEP to monitor the maximum demand. The process documentation stipulates that installations must be HHR.

Audit outcome

Compliant

3.11 Meter Requirements (Clause 26(3) & (4) of Schedule 10.7)

Code related audit information

The ATH needs to document the following in the metering records:

- the meter manufacturer's required recommendations for regular maintenance
- any maintenance that has been carried out on the meter, such as battery monitoring and replacement.

An ATH must record in the metering installation certification report, the maximum interrogation cycle for the metering installation before it certifies a metering installation incorporating a meter.

Audit observation

I checked process documentation, conducted a walk-through of the process and checked 38 certification records.

Audit commentary

As a Class B ATH, Wells is unlikely to deal with any meters where maintenance is required. All AMI devices installed have battery monitoring conducted as part of the data collection function.

I checked 38 certification reports to confirm the maximum interrogation cycle is recorded. The maximum interrogation cycle was not recorded for six installations.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.11 With: Clause 26(4) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	Maximum interrogation cycle not recorded for 6 metering installations. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating
Low	The controls are recorded as weak because the checking process does not seem to identify this field being blank. There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.
Actions taken to resolve the issue	
Completion date	Remedial action status

The installation certifications found to have no Maximum Interrogation Cycle entered can have the required value entered by our back office.	14-12-18	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The instances of this occurring were all on jobs performed under one or other of the two specific workflows, where the field was not setup as a mandatory requirement, as it is in other workflows. This will be changed to ensure that the technician must select a value for this field before the job can be completed.	4-12-18	

3.12 Meter Certification Expiry Date (Clause 27(5) of Schedule 10.7)

Code related audit information

The ATH must record the certification expiry date for each meter in a metering installation in the metering installation certification report and the meter certification report.

Audit observation

I checked 38 certification records to confirm compliance.

Audit commentary

Certification expiry dates are correctly calculated and recorded.

Audit outcome

Compliant

3.13 Measuring Transformer Requirements (Clause 28(3) of Schedule 10.7)

Code related audit information

The ATH needs to document the following in the metering records:

- the manufacturer's recommendations for any regular maintenance required for the measuring transformer*
- any maintenance that has been carried out on the measuring transformer.*

Audit observation

I checked whether any measuring transformers required maintenance.

Audit commentary

Wells has not installed any measuring transformers where maintenance is required.

Audit outcome

Compliant

3.14 Determine Maximum Interrogation Cycle (Clause 36(3) & (4) Of Schedule 10.7)

Code related audit information

An ATH must record the maximum interrogation cycle for the metering installation. The maximum interrogation cycle for a metering installation is the shortest of the following periods:

- the period of inherent data loss protection for the metering installation
- the period of memory availability given the data storage device configuration
- the period in which the accumulated drift of a data storage device clock is expected to exceed the maximum time error set out in Table 1 of clause 2 of Schedule 15.2 for the category of the metering installation.

Audit observation

I checked processes and the records for 38 metering installations to confirm compliance.

Audit commentary

The maximum interrogation cycle was not recorded for six is 38 metering installations.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.14 With: Clause 36(3) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	Maximum interrogation cycle not recorded for 6 metering installations. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak because the checking process does not seem to identify this field being blank. There is no impact on MEPs because they are the source of this information anyway, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The installation certifications found to have no Maximum Interrogation Cycle entered can have the required value entered by our back office.		7-12-18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The instances of this occurring were all on jobs performed under one or other of the two specific workflows, where the field was not setup as a mandatory requirement, as it is in other workflows. This will be changed to ensure that the technician must select a value for this field before the job can be completed.		4-12-18	

4. CALIBRATION AND CERTIFICATION OF METERING COMPONENTS

4.1 Accommodation and Environment (Clause 1(D)-(E) Of Schedule 10.4)

Code related audit information

The ATH must ensure that the environment in which its activities are undertaken is monitored, appropriate for the tests being carried out and unlikely to affect the required accuracy.

Audit observation

Wells does not operate a laboratory function; their scope is limited to field installation work.

Audit commentary

Wells does not operate a laboratory function; their scope is limited to field installation work.

Audit outcome

Compliant

4.2 Use of Measurement Standards (Clause 1(F) Of Schedule 10.4)

Code related audit information

The ATH must comply with the specific requirements of the applicable standard listed in Table 5 of Schedule 10.1.

Audit observation

I checked the standards being used and the test points to confirm compliance.

Audit commentary

Wells uses the correct standards.

Audit outcome

Compliant

4.3 Test Equipment (Clause 2 of Schedule 10.4)

Code related audit information

An ATH must, at all times, ensure that it has access to all items of equipment required for the performance of the calibrations and tests it is approved to undertake under this Part; and each item of equipment it uses is maintained in accordance with the manufacturer's recommendations and this Code. A class B ATH must have and maintain procedures for the purchase of test equipment and associated consumables.

Audit observation

Wells maintains a register of equipment, including test equipment. I confirmed this was up to date and that all relevant equipment is regularly checked and tested.

Audit commentary

Wells maintains a register of equipment, including test equipment. I confirmed this was up to date and that all relevant equipment is regularly checked and tested.

A class B ATH must have and maintain procedures for the purchase of test equipment and associated consumables. The relevant operating procedure was demonstrated during the audit. The relevant consumables are seals, sealing tools and stickers.

Audit outcome

Compliant

4.4 Calibration of Reference & Working Standards (Clause 3(1)(a), (b)(i) and (6) of Schedule 10.4)

Code related audit information

An ATH must ensure that any reference standard is calibrated by an approved calibration laboratory and that any working standard is calibrated by an approved calibration laboratory or class A ATH. The calibration reports for the calibrated standards must be held by the ATH and indicate that the standard is within the manufacturer's accuracy specifications.

Audit observation

Wells has seven Hioki working standards used for comparative certification of Category 2 metering installations. All of these standards have current calibration certificates. The Test Equipment Register in SharePoint sends an automated email notification when recalibration is due. This matter is also an agenda item at monthly meetings.

Audit commentary

Wells has seven Hioki working standards used for comparative certification of Category 2 metering installations. All of these standards have current calibration certificates. The Test Equipment Register in SharePoint sends an automated email notification when recalibration is due. This matter is also an agenda item at monthly meetings.

Audit outcome

Compliant

4.5 Calibration Interval (Clause 3(2) of Schedule 10.4)

Code related audit information

Each reference standard or working standard must be calibrated within the applicable calibration interval set out in Table 1 of Schedule 10.4.

Audit observation

Wells has seven Hioki working standards used for comparative certification of Category 2 metering installations. All of these standards have current calibration certificates. The Test Equipment Register in SharePoint sends an automated email notification when recalibration is due. This matter is also an agenda item at monthly meetings.

Audit commentary

Wells uses the applicable calibration intervals.

Audit outcome

Compliant

4.6 Calibration of Reference Standards (Clause 3(1)(B)(ii), (2), (3)(C), (4) And (5) Of Schedule 10.4)

Code related audit information

Class A ATHs must ensure that in calibration of reference standards, any uncertainties are sufficiently small so that the overall uncertainty in the measurements used to test a metering installation does not exceed one third of the maximum permitted error set out in Table 1 of Schedule 10.1 for the category of metering installation that the reference standard will be used to calibrate.

If a reference standard is used in conditions that deviate from those in the calibration report, the class A ATH must calculate and apply adjustments using its own processes and procedures so that the reference standard achieves the reference conditions.

If a reference standard is used in conditions that deviate from those in the calibration report, the class A ATH must calculate and apply adjustments using its own processes and procedures so that the reference standard achieves the reference conditions.

Audit observation

Wells does not have a reference standard.

Audit commentary

Wells does not have a reference standard.

Audit outcome

Not applicable

4.7 33kv Or Above Calibrated by An Approved Calibration Laboratory (Clause 3(3)(B) Of Schedule 10.4)

Code related audit information

Class A ATHs must ensure that a working standard on a system operating at a voltage of 33kV or above has been calibrated by an approved calibration laboratory.

Audit observation

Wells does not use HV working standards.

Audit commentary

Wells does not use HV working standards.

Audit outcome

Not applicable

4.8 Metering Component Testing System (Clause 4 of Schedule 10.4)

Code related audit information

An ATH may use a complete calibrated metering component testing system (a test bench) as an alternative to a separately calibrated working standard only if the ATH:

- calibrates the test bench as if it was a working standard*
- carries out a testing system accuracy test, using approved reference standards before completing the calibration report.*

Audit observation

Wells does not have a laboratory.

Audit commentary

Wells does not have a laboratory.

Audit outcome

Not applicable

4.9 Calibration Errors (Clause 5 of Schedule 10.4)

Code related audit information

A Standard cannot be used if the ATH believes it has a calibration error. If an error is found then all ATH's that have used the standard must be notified. All metering installations certified using the standard must be treated as defective in accordance with Clause 10.43.

Audit observation

I checked Wells' understanding of this requirement through interview. I checked whether this situation had occurred.

Audit commentary

Wells understands the requirements of this clause. There are no examples of standards with calibration errors.

Audit outcome

Compliant

4.10 Measurement Traceability (Clause 6 of Schedule 10.4)

Code related audit information

An ATH must document, maintain, and comply with a system that ensures, whenever it undertakes a calibration test or measurement, the ATH can replicate the test or measurement in every respect and the results of the measurements are traceable.

Audit observation

Wells conducts comparative certification, which does not fully meet the definition of calibration, therefore Wells has not conducted any calibration activities.

Audit commentary

Wells conducts comparative certification, which does not fully meet the definition of calibration, therefore Wells has not conducted any calibration activities.

Audit outcome

Not applicable

4.11 Calibration Methods (Clause 7(6) of Schedule 10.4)

Code related audit information

An ATH must only use components that have been certified by an ATH or calibration laboratory.

A Class B ATH must follow 17025 calibration methods for components.

The test points must be those listed in the relevant IEC standard.

An ATH must ensure that uncertainty of measurement does not exceed one third of the error listed in the relevant IEC standard listed in Table 5.

If a CT is to be used in a Metering Installation is certified using the selected component method then it must be tested for errors at 5% to 120% of rated current.

An ATH must have documented instructions for calibration that match the IEC standard.

Audit observation

I checked whether Wells calibrates components in accordance with this clause.

Audit commentary

Wells does not calibrate components.

Audit outcome

Not applicable

4.12 Data Storage Device Certification (Clause 5 of Schedule 10.8)

Code related audit information

All data storage devices must be certified before they can be used in a metering installation. The ATH must ensure that the data storage devices in a metering installation have been type tested by an approved test laboratory, that the results for data storage devices are appropriate for that model and version and have a calibration report.

Audit observation

I checked the certification records for 38 metering installations to confirm compliance.

Audit commentary

Wells certifies control data storage devices in accordance with these clauses. The certification report is combined with the metering installation certification report and contains the required details. Wells has confirmation from MEPs that type test reports are available and have been checked.

Audit outcome

Compliant

4.13 Metering Component Stickers (Clause 8(1) of Schedule 10.8)

Code related audit information

An ATH must confirm certification by attaching a metering component certification sticker to the metering component or, if not practicable, provide the sticker with the metering component.

Audit observation

I checked Wells' component stickers to confirm compliance.

Audit commentary

All component stickers are compliant with this clause. I checked photos of 38 installations to confirm they were correctly applied.

Audit outcome

Compliant

4.14 Metering Component Stickers (Clause 8(2) of Schedule 10.8)

Code related audit information

A metering component certification sticker must show:

- the name of the metering component owner (if available)
- if the metering component is a meter or a measuring transformer:
 - a) the name of the ATH or the approved calibration laboratory who calibrated the metering component
 - b) the name of the ATH who certified the metering component
 - c) the date on which the metering component was certified
 - d) the initials or other unique identifier of the person who carried out the certification of the metering component.

Audit observation

I checked Wells' component stickers to confirm compliance.

Audit commentary

All component stickers are compliant with this clause. I checked photos of 38 installations to confirm they were correctly applied.

Audit outcome

Compliant

4.15 Sealing and Monitoring of Seals (Clause 9 of Schedule 10.4 & Clause 47(7) of Schedule 10.7)

Code related audit information

An ATH is required to have a documented system for applying seals to a metering installation to ensure that each metering component in the metering installation that could be expected to affect the accuracy or reliability of the metering installation is sealed. The system of sealing will ensure monitoring of the integrity of the metering installation and that unauthorised access to the metering installation will be identifiable so that the MEP can be notified.

The sealing system will identify:

- the ATH who affixed the seal
- the person (or the sealing tool) who applied the seal
- when the seal was applied.

Audit observation

I checked the quality documentation and a sample of 38 certification records to confirm compliance.

Audit commentary

The quality manual contains a section for the management and application of seals.

Individually numbered seals are available for use and there is a process for their application. The most common method is "wire and ferrule" with numbered sealing tools. During the audit it was confirmed that the sealing tool register is up to date. I checked the photos for 38 installations to confirm the correct application of seals. Compliance is confirmed.

When a seal is discovered to be broken or missing, there is a procedure to ensure the meter owner is notified. Wells records any seals they have broken as an ATH.

Audit outcome

Compliant

5. CALIBRATION AND CERTIFICATION OF METERING INSTALLATIONS

5.1 ATH Must Not Certify Metering Installations under Certain Circumstances (Clause 8(1) Of Schedule 10.7)

Code related audit information

The ATH must not certify a metering installation if the installation does not comply with Part 10

Audit observation

I checked a sample of 38 certification records to confirm compliance.

Audit commentary

There are two scenarios where certification has occurred, despite non-compliance with Part 10.

As recorded in **sections 5.15** and **5.20**, comparative certification has been recorded despite the uncertainty figures for 11 installations being greater than 0.6% as stipulated by Table 1.

The second scenario is where low burden exists and there is not confirmation that the measuring transformers will continue to operate accurately. Five metering installations were certified where this scenario exists.

During the previous audit, it was recorded that ICP 0005170923RN2E6 was comparative certified on 02/03/16 for two years, despite non-compliance with part 10. This ICP has not been recertified and still has a positive error over 30%. Wells has notified the MEP; therefore, their responsibilities have been met.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 5.1 With: Clause 8(1) Of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	11 Category 2 metering installations certified with uncertainties greater than 0.6% 5 Category 2 metering installations certified with burden lower than 25% of the rated burden. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4
Audit risk rating	Rationale for audit risk rating
Medium	The controls are recorded as moderate because there is room for improvement in order to identify such situations. 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.

Actions taken to resolve the issue	Completion date	Remedial action status
Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.	-----	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated	28-12-18	

5.2 Determination of Metering Categories (Clause 5 of Schedule 10.7 & Clause 10.11)

Code related audit information

An ATH is required to determine the category of the metering installation in accordance with Table 1 of Schedule 10.1 before it certifies a metering installation.

Audit observation

I checked certification records for 38 metering installations to confirm compliance.

Audit commentary

All 38 certification reports had the metering category recorded correctly.

Audit outcome

Compliant

5.3 Requirement for Metering Installation Design Report (Clause 2(4) Of Schedule 10.7)

Code related audit information

The ATH must receive a design report from the MEP before installing or modifying a metering installation or a component in a metering installation.

Audit observation

I checked the current suite of design reports and the certification records for 38 metering installations.

Audit commentary

Wells uses design reports modified in conjunction with MEPs. These reports contain all of the required information, including configuration schemes and schematic drawings.

Audit outcome

Compliant

5.4 ATH Design Report Obligations (Clause 3 of Schedule 10.7)

Code related audit information

Before certifying a metering installation the ATH must check the design report to confirm the metering installation will function as designed and that the metering installation will comply with Part 10.

The certifying ATH must update the design report with any changes and provide it to the MEP responsible for the installation within 10 days of installation certification.

Audit observation

I checked the current suite of design reports and the certification records for 38 metering installations.

Audit commentary

Wells uses design reports modified in conjunction with MEPs. These reports contain all of the required information, including configuration schemes and schematic drawings.

Audit outcome

Compliant

5.5 Certification as a Lower Category (Clause 6(1) of Schedule 10.7)

Code related audit information

An ATH may determine that the metering category of a current transformer installation is lower than would otherwise be the case and certify the installation at that lower category only if:

- a protection device, like a fuse or a circuit breaker, is installed so that it limits the maximum current; or*
- the MEP provides evidence from historical data that the maximum current will be lower than the current setting of the protection device for the category that metering installation is currently certified at; or*
- the components in the metering installation will use less than 0.5 GWh in any 12-month period; or*
- the MEP provides evidence from historical data that the installation will use less than 0.5 GWh in any 12-month period.*

Audit observation

I checked the process for certification as a lower category.

Audit commentary

Wells has processes to certify as a lower category. Some installations have been certified in accordance with these clauses prior to this audit period and they are all HHR installations, allowing the MEP to monitor the maximum demand. The process documentation stipulates that installations must be HHR.

One example was checked; ICP 1001149290CK6D4 has 600/5 CTs and was certified as Category 2. The certification report confirms the protection is 450A, which achieves compliance.

Audit outcome

Compliant

5.6 Use of Current Transformer Rating Lower Than Supply Capacity (Clause 6(2)(a) of Schedule 10.7)

Code related audit information

If the ATH determines the category of a current transformer metering installation is lower than would otherwise be the case and a current limiting device is used, the ATH must:

- *confirm the suitability and operational condition of the protection device*
- *record the rating and setting of the protection device in the metering records*
- *seal the protection device*
- *apply, if practicable, a warning tag or label to the seal.*

Audit observation

I checked the process for certification as a lower category.

Audit commentary

Wells has processes to certify as a lower category. Some installations have been certified in accordance with these clauses prior to this audit period and they are all HHR installations, allowing the MEP to monitor the maximum demand. The process documentation stipulates that installations must be HHR.

One example was checked; ICP 1001149290CK6D4 has 600/5 CTs and was certified as Category 2. The certification report confirms the protection is 450A, which achieves compliance.

Audit outcome

Compliant

5.7 Determining Metering Installation Category at a Lower Category Using Current Transformer Rating (Clause 6(2)(b) & (d) of Schedule 10.7)

Code related audit information

The ATH may determine the metering installation category according to the metering installation's expected maximum current, if:

- *there has been a request to do so from the MEP;*
- *the MEP provides evidence from historical data that the maximum current will be lower than the current setting of the protection device for the category that metering installation is currently certified; and*
- *the ATH considers it is appropriate to do so in the circumstances.*

The MEP must obtain the maximum current that flows through the installation each month from the participant interrogating the installation. From this data the ATH can calculate the maximum current from the raw meter data by either calculation from the kVA by trading period if available or from a maximum current indicator if fitted. If the MEP does not receive the monthly report from the participant interrogating the installation or if the current exceeds the maximum calculated rating of the installation, the certification of the installation is automatically cancelled.

Audit observation

I checked the process for certification as a lower category.

Audit commentary

Wells has processes to certify as a lower category. Some installations have been certified in accordance with these clauses prior to this audit period and they are all HHR installations, allowing the MEP to monitor the maximum demand. The process documentation stipulates that installations must be HHR.

One example was checked; ICP 1001149290CK6D4 has 600/5 CTs and was certified as Category 2. The certification report confirms the protection is 450A, which achieves compliance.

Audit outcome

Compliant

5.8 Suitability of Determination Of a Metering Installation Category at a Lower Category Using Current Transformer Rating (Clause 6(3) Of Schedule 10.7)

Code related audit information

Before the ATH determines a metering installation to be a lower category, the ATH must first visit the site of the metering installation to ensure it is suitable for the metering installation to be determined to be a lower category.

Audit observation

I checked the process for certification as a lower category.

Audit commentary

Wells has processes to certify as a lower category. Some installations have been certified in accordance with these clauses prior to this audit period and they are all HHR installations, allowing the MEP to monitor the maximum demand. The process documentation stipulates that installations must be HHR.

One example was checked; ICP 1001149290CK6D4 has 600/5 CTs and was certified as Category 2. The certification report confirms the protection is 450A, which achieves compliance.

Audit outcome

Compliant

5.9 Use of Metering Installation Certification Methods (Clause 7(1) Of Schedule 10.7)

Code related audit information

*When certifying a metering installation, the ATH must use either of the following methods:
a) the selected component certification method if the metering installation is category 1, 2, or 3; or
b) the fully calibrated certification method.*

Audit observation

I checked certification records for 38 metering installations to confirm compliance.

Audit commentary

Wells correctly uses the relevant certification methods. As recorded in the previous audit report, I recommend the method is recorded in certification reports to clearly identify which method is used.

Recommendation	Description	Audited party comment	Remedial action
Clause 7(1) Of Schedule 10.7	Record the certification method in certification reports.	It is agreed that it would be of benefit to show the method of certification in the Metering Installation Certification Report, and so a modification to the workflows and subsequent reports will be initiated	Identified

Audit outcome

Compliant

5.10 Certification of a Metering Installation Using Statistical Sampling or Comparative Recertification (Clause 7(2) Of Schedule 10.7)

Code related audit information

In addition to the selected component and fully calibrated methods, the ATH may also recertify an installation using:

- a) an approved statistical sampling process for category 1 metering installations; or*
- b) the approved comparative recertification method for a category 2 metering installation.*

Audit observation

I checked certification records for 38 metering installations to confirm compliance.

Audit commentary

Statistical certification has not been conducted. Comparative certification has been conducted and my recommendation in **section 5.9** is also relevant to this clause.

Audit outcome

Compliant

5.11 Metering Installation Certification Requirements (Clause 8(3) Of Schedule 10.7)

Code related audit information

An ATH may only certify a metering installation as category 3 or higher if the metering installation incorporates a half hour meter.

Audit observation

I checked the certification records for one Category 3 metering installation during the last audit, which was the only recent example available.

Audit commentary

Category 3 certification has not been conducted during the audit period.

Audit outcome

Compliant

5.12 Certification Tests (Clause 9(1) of Schedule 10.7)

Code related audit information

An ATH, when required to carry out tests specified in Tables 3 or 4 of Schedule 10.1, must comply with the provisions of clause 9(1) of Schedule 10.7 for the following tests:

- a prevailing load test*
- an installation or component configuration test*
- a raw meter data output test.*

A prevailing load test is defined in the Code as a test that is carried out by comparing the output of the metering installation against a working standard connected to the metering installation. For a category 2 or higher metering installation, the prevailing load check must be done against a calibrated instrument (working standard). For a category 1 metering installation industry, best practice has defined a prevailing load test as a measurement of disk revolutions or pulses compared with time and current measurements. The revolutions or pulses are compared against a table or chart to validate the accuracy of the measurement. The prevailing load check is more than simply confirming that the meter operates but is only intended to identify a "gross error" like a phase missing or reversed or a significant metering error.

If the ATH carries out an installation or component configuration test on a metering installation or a metering component, it must ensure that the test equipment configuration is the same as the metering installation or component configuration recorded in the design report.

A raw meter data output test is carried out for a category 1 metering installation or category 2 metering installation by comparing a known load change against the increment of the sum of the meter registers.

Audit observation

I checked process documentation and 38 certification reports to confirm compliance.

Audit commentary

Prevailing load tests for comparative recertification are conducted using a working standard.

The design report reference is included in certification records and this serves the purpose of confirming the configuration scheme.

- Prevailing load tests must be conducted on a metering installation or metering component by using a working standard connected to the metering installation. Wells has conducted prevailing load tests in accordance with this clause using a working standard.
- Installation or component configuration tests must ensure that the actual configuration scheme is the same as the scheme for the metering installation or metering component recorded in the design report. This test is conducted by scrolling through the meter and checking the scheme vs the design drawing.
- Raw meter data output tests for category 1 metering installations or category 2 metering installations must be conducted by applying a measured increase in load and measuring the increment of the sum of the meter registers, or the accumulation of pulses resulting from the increase in load. This test is conducted by using the register advance for Category 2 installations, and by using pulses for Category 1 installations.
- Raw meter data output tests for a HHR metering installation which are category 1 or category 2 must be conducted by either:
 - Comparing the output from a working standard to the raw meter data from the metering installation for a minimum of one trading period; or
 - Confirming that the metering equipment provider's back office processes include a comparison of the difference in the increment of the meter registers to the half-hour metering raw meter data, if the raw meter data is to be used for the purposes of Part 15. Wells has written confirmation from AMS, FCL and IHUB that this comparison occurs. Metrix does not conduct this comparison; therefore, Metrix installations are certified as NHH.
- Raw meter data output tests for category 3 or higher HHR metering installations must compare the output of a working standard to the raw meter data from the metering installation for a minimum of one trading period. This test result was checked and confirmed for one metering installation, which was the only recent example.

- Raw meter data output tests for NHH Category 2 metering installations must compare the output of a working standard to the increment of the sum of the meter registers. Wells has conducted raw meter data output tests in accordance with this clause using a working standard.

If an ATH performs a raw meter data output test, for a metering installation that will be certified for remote meter reading, the ATH must obtain the raw meter data from the back office system where the raw meter data is held or ensure that the metering equipment provider responsible for the metering installation has a process to validate a meter reading taken at the time of the metering installation certification with a meter reading from the metering equipment provider's back office system. Wells has written confirmation from MEPs confirming that they have a process to validate meter readings and that meters are appropriately advancing.

Audit outcome

Compliant

5.13 Raw Meter Data Test for All Metering Installations (Clause 9(1A) Of Schedule 10.7)

Code related audit information

If the ATH performs a raw meter data output test under sub-clause (1)(c) or sub-clause (1)(d), for a metering installation that will be certified for remote meter reading, the ATH must:

- a) obtain the raw meter data from the back office system where the raw meter data is held; or*
- b) ensure that the metering equipment provider responsible for the metering installation has a process to validate a meter reading taken at the time of the metering installation certification with a meter reading from the metering equipment provider's back office system.*

Audit observation

I checked process documentation and 38 certification reports to confirm compliance.

Audit commentary

Wells has a letter from relevant MEPs confirming that they have a back-office validation process.

Audit outcome

Compliant

5.14 Alternate Raw Meter Data Test for Category 1 And 2 Metering Installations (Clause 9(1)(C) Of Schedule 10.7)

Code related audit information

A raw meter data output test is carried out for a category 1 metering installation or category 2 metering installation by comparing a known load change against the increment of the sum of the meter registers.

Audit observation

I checked process documentation to confirm whether Wells conducts this test.

Audit commentary

Wells uses pulse outputs or meter registers for testing.

Audit outcome

Compliant

5.15 Raw Meter Data Output Test (Clause 9(2) And 9(3) Of Schedule 10.7)

Code related audit information

If the ATH performs a raw meter data output test that requires a comparison between two quantities, the ATH must not certify the metering installation unless the test demonstrates that the difference between the two quantities is within the applicable accuracy tolerances set out in Table 1 of Schedule 10.1.

Audit observation

I checked process documentation and records for 38 metering installations to confirm compliance.

Audit commentary

As recorded in **section 5.1**, there were 11 metering installations where the uncertainty figure is greater than 0.6%. This clause requires that the test results are within the accuracy tolerances of Table 1 and uncertainty is listed as one of the tolerances, therefore I have recorded non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.15 With: Clause 9(2) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	11 Category 2 metering installations certified with uncertainties greater than 0.6%. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%. Certification is cancelled for these installations which impacts on the compliance of the MEPs, therefore the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated	28-12-18	
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5.16 Test Results (Clause 10(1) & (2) of Schedule 10.7)

Code related audit information

An ATH must not certify a metering installation if the results of tests on the metering installation or any of its metering components find that:

- a metering component did not pass all the tests
- the metering installation did not meet the requirements for certification.

Within five business days of reviewing the tests, the ATH must advise the relevant MEP why it did not certify the metering installation.

Audit observation

I checked process documentation and records for 38 metering installations to confirm compliance.

Audit commentary

As recorded in **sections 5.1** and **5.15**, there were 11 metering installations where the uncertainty figure is greater than 0.6%. This clause requires that the test results are within the accuracy tolerances of Table 1 and uncertainty is listed as one of the tolerances, therefore I have recorded non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.16 With: Clause 10(1) & (2) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	11 Category 2 metering installations certified with uncertainties greater than 0.6%. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%. Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status

Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.	-----	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated	28-12-18	

5.17 Selected Component Certification (Clause 11(2) of Schedule 10.7)

Code related audit information

An ATH may only use the selected component certification method to certify a metering installation which complies with the categories and component specifications set out in Table 1 of Schedule 10.1.

Audit observation

I checked process documentation and records for 15 metering installations to confirm compliance.

Audit commentary

The process documentation is clear, and all selected component certification reports were compliant.

Audit outcome

Compliant

5.18 Selected Component - Circumstances Where Method May Be Used (Clause 11(3) Of Schedule 10.7)

Code related audit information

An ATH must only use the selected component certification method to certify the metering installation if:

- *the required tests in Table 3 of Schedule 10.1 are carried out*
- *each data storage device, meter, and measuring transformer has been calibrated and certified*
- *each data storage device is certified in accordance with clause 5 of Schedule 10.8*
- *the ATH provides a certification report for the metering installation.*

Audit observation

I checked process documentation and records for 15 metering installations to confirm compliance.

Audit commentary

The process documentation is clear, and all selected component certification reports were compliant.

Audit outcome

Compliant

5.19 Comparative Recertification – Circumstances Where Method May be Used (Clause 12(2) of Schedule 10.7)

Code related audit information

An ATH may only use the comparative recertification method to recertify a category 2 metering installation if:

- the certification of the current transformers in the metering installation expire before the meter certification expiry date*
- each data storage device and/or meter has been calibrated and certified.*

Audit observation

I checked process documentation and records for 23 metering installations to confirm compliance.

Audit commentary

The process documentation is clear, and all comparative certification reports contained confirmation that the meter was replaced by another certified meter.

Audit outcome

Compliant

5.20 Comparative Recertification Tests (Clause 12(3) And 12(5)(A) Of Schedule 10.7)

Code related audit information

An ATH must, when recertifying the category 2 metering installation using the comparative recertification metering installation certification method, ensure that:

- the metering installation has passed the tests set out in Table 3 of Schedule 10.1 using a working standard*
- the accuracy of the current measurement sensor (current transformer or high accuracy Rogowski coil) enables the metering installation to meet the specified accuracy requirements of Table 1 of Schedule 10.1*
- the overall metering installation accuracy meets the requirements of Table 1 of Schedule 10.1 and*
- the ATH provides a certification report for the metering installation.*

Audit observation

I checked process documentation and records for 23 metering installations to confirm compliance.

Audit commentary

The certification reports confirmed that appropriate testing was conducted and that the total accuracy was within the requirements of table 1. A certification report was provided for each metering installation.

As mentioned in **sections 5.1, 5.15 and 5.16**, there were 11 metering installations where the uncertainty figure is greater than 0.6%. This clause requires that the test results are within the accuracy tolerances of Table 1 and uncertainty is listed as one of the tolerances, therefore I have recorded non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.20 With: Clause 12(3) Of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	11 Category 2 metering installations certified with uncertainties greater than 0.6%. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%. Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated		28-12-18	

5.21 Fully Calibrated – Circumstances Where Method May be Used (Clause 13(3) of Schedule 10.7)

Code related audit information

An ATH must use the fully calibrated certification method to certify the metering installation:

- by carrying out the tests set out in Table 4 of Schedule 10.1
- if each of the components (the data storage device, meter, and measuring transformer) has been calibrated and certified.

Audit observation

Wells does not conduct certification under this clause.

Audit commentary

Wells does not conduct certification under this clause.

Audit outcome

Not applicable

5.22 Fully Calibrated - Certify Each Metering Component (Clause 13(4) Of Schedule 10.7)

Code related audit information

Each individual metering component in the metering installation must have a current certification report that confirms that the metering component complies with the requirements of its accuracy class; and includes the certification date of the metering component.

Audit observation

Wells does not conduct certification under this clause.

Audit commentary

Wells does not conduct certification under this clause.

Audit outcome

Not applicable

5.23 Fully Calibrated - Additional Metering Installation Certification Report Requirements (Clause 13(5) & (6) Of Schedule 10.7)

Code related audit information

The ATH must provide a certification report for the metering installation. The certification report must include confirmation that:

- the ATH has checked the design report of the metering installation to confirm the metering installation functions in accordance with the report*
- the overall metering installation accuracy meets the requirements of Table 1 of Schedule 10.1*
- the accuracy of the metering installation remains within the maximum permitted error for the relevant metering installation*
- each metering component in the metering installation is used only in a permitted combination as set out in table 1 of Schedule 10.1.*

Audit observation

Wells does not conduct certification under this clause.

Audit commentary

Wells does not conduct certification under this clause.

Audit outcome

Not applicable

5.24 Fully Calibrated – Use Meter Class Accuracy (Clause 13(7) Of Schedule 10.7)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that the ATH uses the meter class accuracy, and not the actual accuracy, to calculate whether the actual error is within the maximum permitted error.

Audit observation

Wells does not conduct certification under this clause.

Audit commentary

Wells does not conduct certification under this clause.

Audit outcome

Not applicable

5.25 Insufficient Load (Clause 14 of Schedule 10.7)

Code related audit information

Every metering installation requires a test to ensure that the installation is correctly recording the energy used at the installation. The tests required are defined in Tables 3 and 4 of Schedule 10.1. The checks range from a minimum check that the meter registers increments through to a full raw meter data output check against a working standard and a check against the back office data for a half hour installation. If the ATH decides to certify half hour metering installation that has insufficient load to complete a prevailing load check, the ATH must ensure that:

- it performs an additional integrity check of the metering installation wiring, and records the results of this check in the certification report*
- it records in the certification report that the metering installation is certified under clause 14 of Schedule 10.7.*

Once load is present and following a request from the MEP, the ATH must carry out prevailing load tests. If the tests demonstrate that the metering installation performs within the maximum permitted error, the certifying ATH must:

- update the metering installation certification report, within five business days of completing the tests, to include the results of the tests carried out*
- leave the original metering installation certification expiry date unchanged.*

Audit observation

Wells has not conducted insufficient load certification.

Audit commentary

Wells has not conducted insufficient load certification. They always add load to ensure testing can be conducted.

Audit outcome

Not applicable

5.26 Statistical Sampling (Clause 16 of Schedule 10.7)

Code related audit information

A group of meters can be sampled by the ATH and the results of the sample group can be extended to a larger group of the same meters. This is a process of certification by statistical sampling. The ATH must select a sample using a statistical sampling process that is:

- detailed in AS/NZS1284 (or approved and published by the Authority)*
- recertify the group by recertifying each metering installation in the sample using the fully calibrated certification method*
- advise the MEP as soon as reasonably practicable whether the sample passes or fails the recertification requirements.*

If the ATH carries out a statistical sampling process when recertifying a group of category 1 metering installations on behalf of an MEP, it must document and record:

- the process it follows for selecting samples*
- any assumptions about those samples*
- the metering installations in the sample*
- the metering installations in the recertified group.*

An ATH that recertifies a group of metering installations using a statistical sampling process does not need to apply a certification sticker to the remainder of the metering installations in the family or group that was sample tested.

Audit observation

Wells has not conducted statistical certification.

Audit commentary

Wells has not conducted statistical certification.

Audit outcome

Not applicable

5.27 Statistical Sampling - Certification Method (Clause 7(3) Of Schedule 10.7)

Code related audit information

If the ATH uses statistical sampling, it must use either the selected component method or the fully calibrated method, as applicable, to certify each metering installation in the sample.

Audit observation

Wells has not conducted statistical certification.

Audit commentary

Wells has not conducted statistical certification.

Audit outcome

Not applicable

5.28 Certification Validity Periods (Clause 17 of Schedule 10.7)

Code related audit information

A metering installation certification expiry date is the earliest of:

- a) the date of commissioning plus the maximum certification validity period for the relevant category of metering installation, as set out in Table 1 of Schedule 10.1; or*
- b) the earliest metering component certification expiry date; or*
- c) a date determined by the ATH if the ATH believes that the circumstances and condition of the components in a metering installation warrant deviation from Table 1 of Schedule 10.1.*

The expiry date for a metering installation in a group recertified using a statistical sampling process, is the earliest expiry date of the metering installations in the sample.

Audit observation

I checked 38 metering installation certification records to confirm compliance.

Audit commentary

The commissioning date and expiry date is recorded correctly in the metering installation certification reports.

Audit outcome

Compliant

5.29 Metering Installation Accuracy (Clause 21 of Schedule 10.7)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that the metering installation does not exceed the relevant maximum permitted error after the application of any external compensation factors.

Audit observation

I checked 38 metering installation certification records to confirm compliance.

Audit commentary

As mentioned in **sections 5.1, 5.15 and 5.16**, there were 11 metering installations where the uncertainty figure is greater than 0.6%. This clause requires that the test results are within the accuracy tolerances of Table 1 and uncertainty is listed as one of the tolerances, therefore I have recorded non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.29 With: Clause 21 of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	11 Category 2 metering installations certified with uncertainties greater than 0.6%. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%. Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated	28-12-18	
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5.30 Error Calculation (Clause 22 of Schedule 10.7)

Code related audit information

If a metering installation is certified using the comparative recertification or fully calibrated methods, the ATH must calculate and record the percentage of overall error of the metering installation. The ATH must calculate this using appropriate mathematical methods that include:

- all sources of measurement error including test instrument errors, reference standard variations when used in conditions that deviate from those in the calibration report, variations in repeated observations, the instrument resolution or discrimination threshold and any assumptions incorporated in the measurement method and procedure*
- the error calculation must include the uncertainty in the measurement at a 95% level of confidence using JCGM 100:2008*
- the error and its calculation must be recorded in the certification report.*

The ATH must not certify the metering installation if the uncertainty is greater than the maximum permitted site uncertainty or the combined error that includes the measured error and the uncertainty, is greater than the maximum permitted installation error.

Audit observation

I checked 23 metering installation certification records and discussed the process for error calculation.

Audit commentary

Wells is now conducting uncertainty calculations, but as recorded in previous sections the calculation is difficult to understand and there are no controls to ensure the uncertainty is within 0.6%. 11 installations were certified where the uncertainty was greater than 0.6%.

Compliance has not been achieved with this clause since the introduction of "new Part 10" in August 2013. I recommend Wells engages with the Measurement Standards Laboratory to seek assistance with establishing a robust system to calculate and record uncertainty. I also recommend Wells uses the latest MSL calculator to ensure the calculations are accurate.

Recommendation	Description	Audited party comment	Remedial action
Regarding 22 of Schedule 10.7	Engage with MSL to develop a robust and enduring measurement uncertainty calculation methodology.	It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored. It is preferred that complex calculations not be performed by technicians in the field, so a method of incorporating the MSL calculator into the pre-calculation of a safe temperature range for testing with any given working standard / CT set will be looked into	Investigating

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.30 With: Clause 22 Of Schedule 10.7 From: 01-Sep-13 To: 18-Nov-18	Some uncertainty results greater than 0.6%. Potential impact: Medium Actual impact: Medium Audit history: Twice Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	I have rated the controls as weak because they do not ensure uncertainty levels are within 0.6% for a large proportion of metering installations. Certification is cancelled for these installations which impacts on the compliance and audit frequency of the MEPs; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.		-----	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated	28-12-18	

5.31 Compensation Factors (Clause 24(1)(b) of Schedule 10.7)

Code related audit information

Before it certifies a metering installation that requires a compensation factor to adjust raw meter data, the ATH must:

- advise the MEP of the compensation factor
- ensure that the compensation factor that will be applied to raw meter data external to the metering installation is applied as follows:
 - a) for ratio compensation, on a category 1 metering installation or higher category of metering installation; or
 - b) for error compensation, on a metering installation that quantifies electricity conveyed through a point of connection to the grid; or
 - c) for loss compensation, only on a category 3 or higher metering installation.

Audit observation

I checked 23 metering installation certification records, and process documentation.

Audit commentary

Wells has a documented process for the management of compensation factors (multipliers). The testing procedures provide confirmation of the multiplier and CT ratio, the multiplier is recorded on the metering installation certification report. Wells only deals with multipliers, not loss or error compensation factors.

Audit outcome

Compliant

5.32 Record Metering Installation Compensation Factor (Clause 24(2) Of Schedule 10.7)

Code related audit information

If a compensation factor is applied to a metering installation, the ATH must record in the certification report, the methodology, assumptions, measurements, calculation and details of each compensation factor that is included within the internal configuration of the metering installation and each compensation factor that must be applied to the raw meter data.

Audit observation

I checked 23 metering installation certification records, and process documentation.

Audit commentary

Wells has a documented process for the management of compensation factors (multipliers). The testing procedures provide confirmation of the multiplier and CT ratio, the multiplier is recorded on the metering installation certification report. Wells only deals with multipliers, not loss or error compensation factors.

Audit outcome

Compliant

5.33 Installation of Metering Components (Clause 25 of Schedule 10.7)

Code related audit information

Before it certifies a metering installation, the ATH must ensure that the installation of the metering components was carried out by an ATH. However, a suitably qualified person such as a switchboard manufacturer may install the measuring transformers and any required associated burden, the test facilities, potential fuses and switchboard wiring.

Before it certifies a metering installation, the ATH must ensure that each metering component is installed in accordance with the installation design report.

Audit observation

I checked process documentation and conducted a walk-through of the process.

Audit commentary

This clause is designed to allow switchboard manufacturers to install measuring transformers in switchboards at the time of manufacture. This clause does not allow the installation of meters or data loggers. Wells has a documented process to ensure compliance with this clause. There were no specific examples to examine during the audit.

Audit outcome

Compliant

5.34 Determine Metering Installation Certification Expiry Date (Clause 27(1) & (2) Of Schedule 10.7)

Code related audit information

The ATH needs to determine the meter certification expiry date for each meter in a metering installation. The meter certification expiry date must be the earliest end date of the following periods, calculated from the date of commissioning of the metering installation:

- a) the maximum metering installation certification validity period for the relevant category of metering installation; or*
- b) the maximum meter certification validity period set out in Table 2 of Schedule 10.1 for the relevant class of meter for the metering installation; or*
- c) the certification period specified in the meter certification report.*

Audit observation

I checked 38 certification records to confirm compliance.

Audit commentary

All meter and metering installation certification expiry dates were correct.

Audit outcome

Compliant

5.35 Electromechanical Meter Certification Shelf Life (Clause 27(4) Of Schedule 10.7)

Code related audit information

If an electromechanical meter is not installed in a metering installation within 24 months of the date of the meter's certification report, the meter must be recertified before it is installed.

Audit observation

I checked 38 certification records to confirm compliance.

Audit commentary

None of the installations had electromechanical meters. Wells understands the requirements of this clause. Electromechanical meters are seldom installed.

Audit outcome

Compliant

5.36 Measuring Transformers Must Be Certified (Clause 28(2) Of Schedule 10.7)

Code related audit information

All measuring transformers must be certified before they can be used in a metering installation. If a measuring transformer has previously been used in another metering installation, the ATH must ensure that the measuring transformer has been recalibrated since it was removed from the previous metering installation. This must be undertaken either by an approved calibration laboratory or an ATH.

Audit observation

I checked 23 certification records to confirm compliance.

Audit commentary

All of the installations had certified measuring transformers. Wells has a clear understanding of this requirement.

Audit outcome

Compliant

5.37 Measuring Transformers Used In A Certified Metering Installation (Clause 28(4) Of Schedule 10.7)

Code related audit information

To certify any metering installation incorporating measuring transformers, the ATH must ensure that:

- the installation has certified measuring transformers*
- the installation has a test facility which has provision for isolation, installed as physically close to the meter as practical in the circumstances*
- the test facility is fitted with a transparent cover*
- the installation has securely mounted measuring transformers which are, if practicable, in a sealed enclosure*
- the ATH uses the measuring transformer's actual accuracy (rather than class accuracy) when calculating the maximum permitted error for the relevant metering installation category*
- any voltage supplies from a voltage transformer to a meter or that other equipment in the metering installation is protected by appropriately rated fuses or circuit breakers dedicated to the supply. All fuses and circuit breakers must be suitably sealed or located in sealed enclosures*
- the measuring transformer's secondary circuit is earthed and that it is earthed at no more than one point*

- the total burden (magnitude and phase angle, where appropriate), including burden resistors if used, on the measuring transformer does not exceed its name plate rating or an alternative rating lower than the name plate rating, if specified in the metering installation design report.

Audit observation

I checked 23 certification records, and process documentation to confirm compliance.

Audit commentary

The process documentation and design reports stipulate all of the requirements above. The certification reports confirmed compliance with regard to certification and high burden.

During the audit period, Wells developed a methodology to deal with low burden by installing burden resistors at the test facility. The methodology involves removing one of the test facility links and replacing it with a burden resistor, as shown in the photo below. The problem with this methodology is that the test facility is now partially disabled. The definition of a test facility is as follows:

test facility means a device that permits access to voltage and current circuits for testing purposes while the **metering installation** is in normal service

With a link removed, there is not access to the current circuits “in normal service” because the burden resistor is in the place of a link and will be removed when testing is conducted.



Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.37 With: Clause 28(4)(a)(i) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	Test facility, meeting the definition of a test facility, not always installed. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. There is very little impact because test facilities are seldom used for testing purposes for Category 2 installations; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
It is not clear from the definition in Part-1, test facility means a device that permits access to voltage and current circuits for testing purposes while the metering installation is in normal service how a test facility is intended to be used, nor have any examples of a test facility's use been found to date, either online or through communications with an MEP. In our interpretation of the definition, the approach we have been taking, which was developed as the most pragmatic, cost-effective, and functionally effective solution we could devise with no guidance from either the EA or any MEPs, is still compliant in that the CT wiring can be readily accessed and/or interrupted for the purposes of measuring CT secondary voltage and current. If it is considered that all test blocks must have 13 terminals, then we can reinstate the terminals absent from these test facilities, but would then need to devise an alternative housing and mounting method for the burden resistors, which would introduce additional chargeable fieldwork for the MEP. Note that we do not consider that mounting the burden resistors on the CTs is practical in many situations due to access, good working practice and safety concerns.		TBD	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We will give thought to an alternate method of burden resistor housing/installation, but in light of the apparent range of approaches currently in the industry as to best address this, we believe an industry consultation between MEPs and ATHs would be highly beneficial in identifying a satisfactory method that meets all functional, cost and safety requirements		28-22-19	

5.38 Measuring Transformer Certification Expiry Date (Clause 29 of Schedule 10.7)

Code related audit information

The ATH needs to determine the measuring transformer certification expiry date for each measuring transformer in a metering installation. The measuring transformer certification expiry must be within the validity period specified in the measuring transformer certification report.

Audit observation

I checked 23 certification records to confirm compliance.

Audit commentary

CTs supplied to Wells are certified with a validity period table in the certification report and with appropriate stickers. Wells then calculates and records the expiry date.

Audit outcome

Compliant

5.39 Other Equipment Connected to Measuring Transformers (Clause 30 of Schedule 10.7)

Code related audit information

If the ATH certifies a metering installation incorporating a measuring transformer used by another metering installation, it must ensure that where voltage transformers are connected to more than one meter:

- *the meters are included in the metering installation being certified*
- *appropriate fuses or circuit breakers are provided to protect the metering circuit from short circuits or overloads affecting the other meter.*

While it is desirable that only metering equipment is connected to measuring transformers in a metering installation if, in some circumstances, the MEP connects other equipment to measuring transformers, the ATH must ensure that:

- *the accuracy of the metering installation remains within the maximum permitted error for the relevant metering installation category*
- *the metering installation certification report confirms that the accuracy of the metering installation remains within the maximum permitted error for the relevant metering installation*
- *any wiring between the equipment and any part of the metering installation is continuous*
- *the equipment is labelled appropriately, including with any de-energisation restrictions*
- *the connection details of the other equipment are recorded in the metering installation design report*
- *there are appropriate fuses or circuit breakers provided to protect the voltage transformer and metering circuit from short circuits or overloads affecting the other equipment.*

Audit observation

I checked whether the situation arises where other equipment is connected to measuring transformers.

Audit commentary

This scenario is not likely to occur with the scope of the Wells ATH operation, and no examples were available to review.

Audit outcome

Not applicable

5.40 Burden & Compensation (Clause 31 of Schedule 10.7)

Code related audit information

An ATH may certify a metering installation for a POC to the grid that includes error compensation factors as an alternative to the use of burden resistors only if the ATH is satisfied the error compensation factors will provide a more accurate result than the use of burden resistors.

An ATH may change the burden on a voltage transformer, without obtaining the approval of the MEP, if the ATH confirms in the certification report that the difference between the new burden and the burden at the time of the most recent metering installation certification is:

a) less than or equal to 1/30th of the VA rating of the voltage transformer, if the voltage transformer is rated at less than 30 VA; or

b) no greater than 1 VA, if the voltage transformer is rated at equal to or greater than 30 VA.

Before it certifies a measuring transformer where the in-service burden is less than the lowest burden test point specified in a standard set out in Table 5 of Schedule 10.1, the ATH must install burdening resistors to increase the in-service burden to be equal to or greater than the lowest test point of the measuring transformer certification test or confirm from the manufacturer of the instrument transformer that the accuracy will not be adversely affected by the low in service burden.

Audit observation

I checked processes and the records for 23 metering installations to confirm compliance.

Audit commentary

The issue of the low burden for CTs has been clarified by the Authority through a memo, which confirms that ATHs are required to take certain actions if the in-service burden is less than the lowest test point used when the CT was calibrated. The actions are to install burden resistors or confirm with a Class A ATH or the manufacturer that the CTs will continue to operate accurately at low burden. The industry has confirmed that TWS CTs record accurately at low burden, but there is no information available for other makes of CT.

During the previous audit, Wells provided reporting for 1,600 ICPs where comparative certification had occurred in the previous 12 months. 245 had non TWS CTs and 239 had an in-service burden lower than the lowest test point. In all 239 cases, burden resistors were not installed.

I checked the certification reports for 23 metering installations and five had low burden but did not have burden resistors installed.

I recommend checks for burden levels and whether resistors have been installed is added to the photo checking process.

Recommendation	Description	Audited party comment	Remedial action
Regarding: Clause 31 Of Schedule 10.7	Include checks of burden levels and whether resistors have been added to the photo checking process.	It is acknowledged that there is no alert in the workflows to prevent the job from being completed if the calculated burden is below the lower acceptable limit, so a modification to the relevant workflows will be initiated, and a check in the photochecking process added	Identified

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 5.40 With: Clause 31 Of Schedule 10.7 From: 01-Dec-14 To: 18-Nov-18	5 installations had low burden and burden resistors were not installed. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	There is now a process to install resistors, but the checking processes do not identify when this is not done. The impact on settlement is likely to be minor because the overall error of the installations is measured and recorded.		
Actions taken to resolve the issue		Completion date	Remedial action status
The only remedy for these installations will be to return to site to install burden resistors and repeat the burden and Prevailing Load tests, although as identified elsewhere, the current burden resistor installation approach is not considered by all parties to be compliant .		TBD	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
It is acknowledged that there is no alert in the workflows to prevent the job from being completed if the calculated burden is below the lower acceptable limit, so a modification to the relevant workflows will be initiated, and a check in the photochecking process added		28-22-19	

5.41 Alternative Certification (Clause 32(1) of Schedule 10.7)

Code related audit information

If the ATH cannot comply with the requirements for certifying a measuring transformer solely due to the inability to obtain physical access to test the measuring transformers, it can certify the metering installation for a period not exceeding 24 months only if:

- the measuring transformer has not previously been certified due to failure to obtain access
- the ATH is satisfied that the metering installation will comply with the applicable accuracy requirements
- the ATH has advised the MEP that the metering installation has been certified by this method
- the MEP has advised the registry of the certification.

Audit observation

I checked the process documentation and whether any examples had occurred.

Audit commentary

Wells has not applied alternative certification, but the process documentation is compliant.

Audit outcome

Compliant

5.42 Installations Incorporating Control Devices (Clause 33(2) of Schedule 10.7)

Code related audit information

Before the ATH can certify a metering installation incorporating a control device that must be certified, it must ensure:

- *that the certification expiry date for each control device is the same as the metering installation certification expiry date and record that date in the installation certification report*
- *that the control device complies with the applicable standards listed in Table 5 of Schedule 10.1*
- *the control device is fit for purpose*
- *if the metering installation contains a control device that has previously been used in another metering installation, that the control device is still fit for service.*
- *that the control device is:*
 - a) *likely to receive control signals*
 - b) *correctly connected*
 - c) *correctly programmed.*

Audit observation

I checked certification records for 15 metering installations to confirm compliance.

Audit commentary

Wells is certifying control devices and correctly applying stickers. The control device certification expiry date is correctly recorded in the installation certification report. MEPs have stated in writing that there are no signal propagation issues they are aware of.

All points above are met.

Audit outcome

Compliant

5.43 Control Device Reliability (Clause 34(1) & (3) to (5) of Schedule 10.7)

Code related audit information

In order to ensure control device accuracy or the completeness of reconciliation information, the ATH must determine the likelihood of the control device not receiving control signals before it certifies a metering installation incorporating a control device.

If the ATH believes the likelihood of the control device not receiving control signals would affect the accuracy or completeness of the information for consumption reconciliation, the ATH may certify the remainder of the metering components and the installation, excluding the control device. The ATH must advise the MEP within three business days of its decision. The MEP is then responsible for advising both the reconciliation participant for the POC for the metering installation and the control signal provider of the ATH's determination.

Audit observation

I checked correspondence in relation to this matter to determine compliance.

Audit commentary

Wells has appropriate fields in the metering installation certification report to confirm compliance with this clause. Wells checked with all MEPs whether there were any known control signal issues they needed to be aware of, and it was confirmed there were no areas in this category.

Audit outcome

Compliant

5.44 Data Storage Devices (Clauses 36(2) of Schedule 10.7)

Code related audit information

If a data storage device has previously been used in another metering installation, the ATH must ensure that the data storage device has been recalibrated since it was removed from the previous metering installation by an approved calibration laboratory, an approved test laboratory, or an ATH.

Audit observation

I checked processes and the records for 15 metering installations to confirm compliance.

Audit commentary

All data storage devices are recertified prior to being reinstalled.

Audit outcome

Compliant

5.45 Data storage device requirements (Clause 38(1) and (2) of Schedule 10.7 and clause 5(1) of Schedule 10.8)

Code related audit information

An ATH must ensure that each data storage device in the metering installation:

- is installed so that on-site interrogation is possible without the need to interfere with seals*
- has a dedicated power supply unless the data storage device is integrated with another metering component*
- is compatible with each other metering component of the metering installation*
- is suitable for the electrical and environmental site conditions in which it is installed*
- has all of its outputs and inputs appropriately electrically isolated and rated for purpose*
- has no outputs that will interfere with the operation of the metering installation*
- records periods of data identifiable or deducible by both date and time on interrogation*
- has memory capacity and functionality that is suitable for the proposed functions of the data storage device specified in the design report for the metering installation*
- has availability of memory for a period that is suitable for the proposed functions as set out in the design report for the metering installation, and at least for a minimum continuous period of 15 days.*

The data storage device must have an event log which records the following:

- a) loss of power supply*
- b) critical internal alarms*
- c) meter phase failure if integral to the meter*
- d) software configuration changes*
- e) a record of time changes.*

Audit observation

I checked the availability of type test reports, and processes for determining environmental suitability.

Audit commentary

All of the points above apart from the point regarding environmental suitability are covered by the type test reports. Wells has appropriate instructions for the identification and recording of unsuitable environments.

Audit outcome

Compliant

5.46 Location of Metering Installation Certification Stickers (Clause 41(1) of Schedule 10.7)

Code related audit information

An ATH must confirm the metering installation certification by attaching a metering installation certification sticker as close as possible to the meter, while maintaining reasonable visibility of the certification sticker and the meter.

Audit observation

I checked the photos for 15 metering installations to confirm compliance.

Audit commentary

In all cases, the certification stickers contained the appropriate detail and were correctly applied.

Audit outcome

Compliant

5.47 Alternate Location of Metering Installation Certification Sticker (Clause 41(4) Of Schedule 10.7)

Code related audit information

If attaching a certification sticker is not practicable, the ATH must devise and use an alternative means of documenting the information and keep any metering component certification sticker with the documented information.

Audit observation

I checked with Wells whether this scenario had arisen.

Audit commentary

This scenario has not arisen and is unlikely to arise.

Audit outcome

Not applicable

5.48 Contents of Metering Installation Certification Sticker (Clause 41(2) Of Schedule 10.7)

Code related audit information

The metering installation certification sticker must show:

- the name of the ATH who certified the metering installation
- the certification date of the installation
- the metering installation category
- the ICP
- the certification number for the metering installation.

Audit observation

I checked the photos for 15 metering installations to confirm compliance.

Audit commentary

In all cases, the certification stickers contained the appropriate detail and were correctly applied.

Audit outcome

Compliant

5.49 Enclosures (Clause 42 of Schedule 10.7)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that, if a metering component in the metering installation is housed in a separate enclosure from the meter enclosure, the enclosure is appropriate to the environment in which it is located and has a warning label attached stating that the enclosure houses a metering component.

Audit observation

I checked the photos for 15 metering installations to confirm compliance.

Audit commentary

Although this clause only refers to enclosures other than the metering enclosure, I have considered this clause to apply to metering enclosures as well.

The photos for 15 metering installations showed that all enclosures were appropriate for the environment, and the Wells certification sticker has an appropriate warning. Wells reviews photos of all installations to confirm enclosure suitability.

Whilst the installation certification sticker contains a warning statement, there is not a separate sticker for CT chambers, which can be remote from the metering enclosure in some cases. I recommend a separate sticker is developed for CT chambers indicating metering components are inside and with an appropriate warning.

Recommendation	Description	Audited party comment	Remedial action
Regarding: Clause 42 of Schedule 10.7	Develop a CT chamber warning sticker.	<p>A suitable CT Chamber warning sticker will be developed and issued to Cat-2 technicians</p> <p>42 Enclosures An ATH must, before it certifies a metering installation, ensure that, if a metering component in the metering installation is housed in a separate enclosure from the meter enclosure, the enclosure is— (a) appropriate to the environment in which it is located; and (b) has a warning label attached stating that the enclosure houses a metering component.</p> <p>(6) An ATH must, when applying a seal to a metering component in an enclosure, attach a label in a prominent position inside the enclosure, warning— (a) of the presence of a sealed metering component in the enclosure; and (b) that care must be taken not to disturb the connections to the metering component.</p>	Identified

Audit outcome

Compliant

5.50 Metering Component Certification (Clause 43(1) of Schedule 10.7)

Code related audit information

Before certifying an installation, the ATH must ensure that each component has been certified by an ATH and has been stored appropriately since component certification.

Audit observation

I checked the processes for storage of components, and the records for 38 metering installations to confirm compliance.

Audit commentary

As mentioned in earlier sections, Wells has ensured each metering component is certified prior to certification of metering installations.

Wells has appropriate arrangements for storage and transportation, and they have letters on file from MEPs confirming that storage and transportation arrangements are appropriate from the factory to Wells.

Audit outcome

Compliant

5.51 Sealing Requirements (Clause 47(2) (3) (4) and (5) Of Schedule 10.7)

Code related audit information

Before an ATH certifies a metering installation or leaves it unattended, the ATH must ensure that each metering component that could reasonably be expected to affect the accuracy or reliability of the metering installation is sealed.

The metering components which must be sealed include:

- each part and connection of a data storage device in, or attached to, the metering installation except for a port for on-site reading that is not capable of carrying out any other function

- the main switch cover, if the main switch:

a) is on the supply side of the metering installation

b) has provision for sealing.

Audit observation

I checked process documentation, design reports and the photos for 38 metering installations to confirm compliance.

Audit commentary

The process documentation, design reports and the photos for 38 metering installations confirm compliance.

Audit outcome

Compliant

5.52 Seals for Metering Component Enclosures (Clause 47(6) Of Schedule 10.7)

Code related audit information

When applying a seal to a metering component in an enclosure, the ATH must attach a warning label in a prominent position inside the enclosure.

Audit observation

I checked process documentation, design reports and the photos for 38 metering installations to confirm compliance.

Audit commentary

The process documentation, design reports and the photos for 38 metering installations confirm compliance. The warning label is installed in a prominent position.

Audit outcome

Compliant

5.53 Requirements for Sealing System (Clause 47(7) Of Schedule 10.7)

Code related audit information

An ATH must use a sealing system that enables identification of:

- *the ATH who affixed the seal*
- *the person (or the sealing tool) who applied the seal*
- *when the seal was applied.*

Audit observation

I checked process documentation, design reports and the photos for 38 metering installations to confirm compliance.

Audit commentary

The process documentation, design reports and the photos for 38 metering installations confirm compliance. The certification records contain the relevant details required by this clause.

Audit outcome

Compliant

5.54 Removal or Breakage of Seals (Clause 48(6) of Schedule 10.7)

Code related audit information

When the ATH investigates an unauthorised removal or breakage, it must assess the accuracy and continued integrity of the metering installation. If the ATH considers the accuracy and continued integrity is unaffected, it must replace the removed or broken seals.

If the accuracy and continued integrity is affected, the ATH must replace the removed or broken seal and advise the MEP that the metering installation is potentially inaccurate, defective, or not fit for purpose.

Audit observation

I checked the process documentation to confirm compliance.

Audit commentary

When a seal is discovered to be broken or missing there is a procedure to ensure the MEP is notified. Wells also has a procedure and instruction to notify the MEP if any issues are present due to broken or damaged seals. Wells records any seals they have broken as an ATH.

Audit outcome

Compliant

5.55 Wiring (Clause 6 of Schedule 10.8)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that all wiring in the metering installation is suitable for the environment in which the metering installation is located, fit for purpose, securely fastened, and compliant with all applicable requirements and enactments.

The ATH must ensure that the wiring between metering components in the metering installation:

- *is run as directly as practicable*
- *is appropriately sized and protected*
- *does not, to the extent practicable, include intermediate joints for any measuring transformer circuits*
- *includes conductors that are clearly and permanently identified, by the use of any 1 or more of the following:*
 - a) *colour coding*
 - b) *marker ferrules*

c) conductor numbering.

If it is not practicable to exclude intermediate joints for any measuring transformer circuits, the ATH must ensure that the intermediate joints are sealed or in a sealed enclosure.

Audit observation

I checked process documentation, design reports and the photos for 23 metering installations to confirm compliance.

Audit commentary

The process documentation, design reports and the photos for 23 metering installations confirm compliance.

Audit outcome

Compliant

5.56 Fuses and Circuit Breakers (Clause 7 of Schedule 10.8)

Code related audit information

An ATH must, before it certifies a metering installation, ensure that all fuses and circuit breakers that are part of the metering installation are appropriately rated for the electrical duty and discrimination required, clearly labelled and sealed or located in sealed enclosures.

Audit observation

I checked process documentation, design reports and the photos for 23 metering installations to confirm compliance.

Audit commentary

The checks demonstrated compliance with this requirement.

Audit outcome

Compliant

5.57 Calibration of Metering Components Where Relevant (Clause 7(1) Of Schedule 10.4)

Code related audit information

Before the ATH certifies a metering installation or metering component, it must ensure that the metering components have been calibrated by an approved calibration laboratory or an ATH with appropriate approval under Schedule 10.3.

Audit observation

I checked process documentation, design reports and 38 certification reports to confirm compliance.

Audit commentary

All certified components have calibration reports and stickers.

Audit outcome

Compliant

5.58 Requirement for Calibration of Metering Components (Clause 7(2) Of Schedule 10.4)

Code related audit information

Before the ATH certifies a metering component it must ensure that the component is calibrated or adjusted under the physical and electrical conditions specified in Table 5 of schedule 10.1 and the conditions permit the calculation of uncertainties at the reference conditions.

Audit observation

I checked process documentation, design reports and 38 certification reports to confirm compliance.

Audit commentary

All certified components have calibration reports and stickers.

Audit outcome

Compliant

5.59 Metering Component Calibration Method (Clause 7(3) Of Schedule 10.4)

Code related audit information

A class B ATH must follow the relevant requirements of ISO17025 for calibration of components and only use methodologies that have been verified in their most recent audit.

Audit observation

Wells's Class B ATH does not calibrate components.

Audit commentary

Wells's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.60 Metering Component Calibration Test Points (Clause 7(4) Of Schedule 10.4)

Code related audit information

If the ATH calibrates a component it must ensure that the test points that it uses are either:
- no less than the test points in Table 5 of Schedule 10.1 or
- sufficient to calculate the metering installation error as defined in clause 22 of Schedule 10.7.

Audit observation

Wells's Class B ATH does not calibrate components.

Audit commentary

Wells's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.61 Determine Metering Component Error and Record (Clause 7(5) Of Schedule 10.4)

Code related audit information

An ATH must, when calibrating a metering component:

- *if necessary, adjust and document the error compensation*
- *ensure that any adjustment carried out is appropriate to achieve an error as close as practicable to zero*
- *ensure that the uncertainty of measurement during the calibration of the metering component does not exceed one third of the maximum permitted error in the relevant standard listed in Table 5 of Schedule 10.1.*

If the metering component is intended for a metering installation which will be certified using the selected component certification method, the ATH must ensure that the ATH records the errors of a current transformer from 5 % to 120 % of rated primary current.

Audit observation

Wells's Class B ATH does not calibrate components.

Audit commentary

Wells's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.62 Class B ATH Calibrating Metering Components (Clause 2(3) Of Schedule 10.3)

Code related audit information

If a class B ATH wishes to calibrate components (such as class 0.5 meters, class 1 meters, class 2 meters, class 0.5 current transformers, and class 1.0 current transformers) this must be carried out under the relevant provisions and methodologies of ISO 17025. The final audit report must include a list of all relevant requirements of ISO 17025 for calibrating these metering components and all relevant methodologies audited.

Audit observation

Wells's Class B ATH does not calibrate components.

Audit commentary

Wells's Class B ATH does not calibrate components.

Audit outcome

Not applicable

5.63 Meter Certification (Clause 1 of Schedule 10.8)

Code related audit information

All meters must be certified before they can be used in a metering installation. The ATH must ensure that the meters in a metering installation have been type tested by an approved test laboratory, that the results for the meter are appropriate for that meter model and version and have a calibration report.

Audit observation

I checked the certification records for 38 metering installations to confirm compliance.

Audit commentary

Wells certifies meters based on the fact MEPs have a copy of type test certificates and calibration reports. Written confirmation has been provided to Wells.

Audit outcome

Compliant

5.64 Meter Requirements When Meter Is Relocated (Clause 26(2) Of Schedule 10.7 and Clause 43(2) Of Schedule 10.7)

Code related audit information

If a meter has previously been used in another metering installation, the ATH must ensure that the meter has been recalibrated since it was removed from the previous metering installation by an approved calibration laboratory or an ATH unless it is less than 12 months since the meter was commissioned in the previous installation.

Audit observation

I checked the process documentation in relation to this clause.

Audit commentary

This clause is designed to allow builder's temporary supplies to be portable without the need to calibrate the meter every time. Wells understands the requirements of this clause and has appropriate processes in place to correctly determine expiry dates.

Audit outcome

Compliant

5.65 Measuring Transformer Error Testing (Clause 2(1)(A) & (B) Of Schedule 10.8)

Code related audit information

Before certifying a measuring transformer, an ATH must test the measuring transformer's errors at a range of primary values at their rated burdens. If the measuring transformer is a multi-tap current transformer, an ATH must carry out the calibration tests and only certify the transformer for the ratios that have been calibrated.

Audit observation

Wells certifies CTs based on calibration reports provided by a Class A ATH.

Audit commentary

Wells certifies CTs based on calibration reports provided by a Class A ATH, which covers the points raised above.

Audit outcome

Compliant

5.66 Measuring Transformer Certification (Clause 3 of Schedule 10.8)

Code related audit information

Before it certifies a measuring transformer, the ATH must ensure that:

- *the measuring transformer has a current calibration report issued by an approved calibration laboratory or an ATH approved to carry out calibration*
- *the measuring transformer calibration report:*
- *confirms that the measuring transformer complies with the standards listed in Table 5 of Schedule 10.1*
- *records any tests the ATH has performed to confirm compliance*
- *confirms that the measuring transformer has passed the tests*
- *records any recommendations made by the ATH on error compensation*
- *includes any manufacturer's calibration test reports.*

The ATH is required to produce a measuring transformer certification report that includes:

- *the date on which it certified the measuring transformer*
- *the certification validity period for the measuring transformer, which must be no more than 120 months*
- *whether the certification was based on batch test certificates*
- *if the certification was based on batch test certificates, confirmation that the manufacturer's batch testing facility is, in the ATH's opinion, of an acceptable standard*

The ATH must provide confirmation that the ATH has inspected the manufacturer's test certificates, and carried out any additional tests it considers necessary, to satisfy itself that the measuring transformer meets the accuracy requirements.

Audit observation

Wells certifies CTs based on calibration reports provided by a Class A ATH, which covers the points raised above.

Audit commentary

Wells certifies CTs based on calibration reports provided by a Class A ATH, which covers the points raised above.

Audit outcome

Compliant

5.67 Measuring Transformers In Service Burden Lower Than Calibration Test Point Burden (Clause 2(1)(C) Of Schedule 10.8)

Code related audit information

If the in-service burden of a measuring transformer is lower than a test point specified in a standard listed in Table 5 of Schedule 10.1, the ATH must confirm the accuracy of the measuring transformer at the in-service burden by:

- a) obtaining confirmation of accuracies at the in-service burden from the measuring transformer's manufacturer; or*
- b) if the primary voltage of the measuring transformer is greater than 1 kV, a class A ATH calibrating the measuring transformer at the in-service burden.*

Audit observation

This matter is discussed in **section 5.40**, where non-compliance is recorded.

Audit commentary

This matter is discussed in **section 5.40**, where non-compliance is recorded.

Audit outcome

Non-compliant

5.68 Measuring Transformer - Epoxy Insulated (Clause 2(2) Of Schedule 10.8)

Code related audit information

Before it certifies an epoxy insulated current transformer, the ATH must ensure that the certification tests allow for, and the metering installation certification report shows, the current transformer's age, temperature, and batch.

Audit observation

I checked the policy regarding epoxy CTs.

Audit commentary

Epoxy insulated CTs are discarded upon discovery.

Audit outcome

Compliant

5.69 Control Device Certification (Clause 4 of Schedule 10.8)

Code related audit information

Before it certifies a new control device, the ATH must produce a certification report that:

- confirms that the control device complies with the applicable standards listed in Table 5 of Schedule 10.1*
- includes the details and results of any test that the ATH has carried out to confirm compliance under paragraph (a)*
- confirms that the control device has passed such tests.*

Before it certifies an existing installed control device, the ATH must produce a certification report that confirms:

- that the control device is fit for purpose*
- the control device certification validity period that the ATH considers appropriate, which must be no more than 180 months.*

Audit observation

I checked the certification records for 15 metering installations to confirm compliance.

Audit commentary

Wells certifies control devices in accordance with these clauses. The certification report is combined with the metering installation certification report and contains the required details.

Audit outcome

Compliant

5.70 Data Storage Devices (Clause 36(2) Of Schedule 10.7)

Code related audit information

If a data storage device has previously been used in another metering installation, the ATH must ensure that the data storage device has been recalibrated since it was removed from the previous metering installation by an approved calibration laboratory, an approved test laboratory, or an ATH.

Audit observation

I checked the certification records for 38 metering installations and the process documentation to confirm compliance.

Audit commentary

The process documentation and certification records confirmed that data storage devices are certified prior to installation.

Audit outcome

Compliant

5.71 On-site Calibration and Certification (Clause 9(1) of Schedule 10.8)

Code related audit information

An ATH may only calibrate a metering component on site in the metering component's normal environment by measuring the influence of all on-site variables and including their estimated effects in the uncertainty calculation. An ATH must ensure that:

- the effects of any departures from the reference conditions can accurately and reliably be calculated*
- the metering installation, in which the metering component is incorporated, is within the applicable accuracy tolerances set out in Table 1 of Schedule 10.1 after taking into account all known influences including temperature and temperature co-efficient measurements.*

Audit observation

Wells conducts comparative recertification but does not conduct onsite calibration of metering components.

Audit commentary

Wells conducts comparative recertification but does not conduct onsite calibration of metering components.

Audit outcome

Not applicable

5.72 On Site Metering Component Calibration (Clause 9(2) Of Schedule 10.8)

Code related audit information

If the ATH calibrates a metering component on site using manual methods, computers, or automated equipment for the capture, processing, manipulation, recording, reporting, storage, or retrieval of calibration data, it must ensure that its computer software:

- is documented in the ATH's procedures*
- can manipulate the variables that affect the performance of the metering component in a manner that will produce results that would correctly indicate the level of compliance of the metering component with this Code.*

Audit observation

Wells conducts comparative recertification but does not conduct onsite calibration of metering components.

Audit commentary

Wells conducts comparative recertification but does not conduct onsite calibration of metering components.

Audit outcome

Not applicable

5.73 On site metering component calibration records (Clause 9(3) of Schedule 10.8)

Code related audit information

An ATH that certifies a metering component on site must include confirmation in the metering component certification report that:

- it has calculated the uncertainty of measurement taking into account all environmental factors for both the metering component being calibrated and the working standards*
- the calculation of the uncertainty comprises all uncertainties in the chain of calibration*
- the ATH has used a calibration procedure to calibrate the metering component that was included in the ATH's most recent audit and is appropriate for on-site calibration.*

Audit observation

Wells conducts comparative recertification but does not conduct onsite calibration of metering components.

Audit commentary

Wells conducts comparative recertification but does not conduct onsite calibration of metering components.

Audit outcome

Not applicable

5.74 Data Storage Device Certification Expiry Date (Clause 37 of Schedule 10.7)

Code related audit information

Before certifying a meter installation which incorporates a data storage device, the ATH must determine the expiry date of the data storage device. The ATH must record the expiry date in the certification report for the metering installation and the certification report for the data storage device.

Audit observation

I checked the records for 38 metering installations to confirm compliance.

Audit commentary

Wells is correctly applying certification in accordance with this clause.

Audit outcome

Compliant

5.75 All Functions and Activities Must Be Completed (Clause 10.42(2))

Code related audit information

Where Part 10 requires the ATH to complete a function or activity before a metering installation is certified, the ATH must complete that function or activity as part of the process for certifying the metering installation.

Audit observation

I checked the records for 38 metering installations to confirm compliance.

Audit commentary

There was no evidence of incomplete functions.

Audit outcome

Compliant

6. INSPECTION OF METERING INSTALLATIONS

6.1 General Inspection Requirements (Clause 44 (1) (a) to (e) of Schedule 10.7)

Code related audit information

When carrying out an inspection of a metering installation, the ATH must:

- check and confirm that the data storage device in the metering installation operates as required*
- check and confirm that the expected remaining lifetime of each battery in the metering installation will be reasonably likely to meet or exceed the metering installation certification expiry date*
- ensure that no modifications have been made to the metering installation without the change having been documented and certification requirements satisfied*
- visually inspect all seals, enclosures, metering components, and wiring of the metering installation for evidence of damage, deterioration, or tampering*
- ensure that the metering installation and its metering components carry appropriate certification stickers.*

Audit observation

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit commentary

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit outcome

Not applicable

6.2 Raw Meter Data Test (Clause 44(1)(F) Of Schedule 10.7)

Code related audit information

When carrying out an inspection of a category 1 metering installation, the ATH must also check and confirm there is no difference between the volume of electricity recorded by the master accumulation register of a data storage device, and the sum of the meter registers.

Audit observation

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit commentary

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit outcome

Not applicable

6.3 Prepare Inspection Report (Clause 44(2) Of Schedule 10.7)

Code related audit information

An ATH must prepare an inspection report for each inspection of a metering installation that it carries out, which includes the following:

- details of the checks carried out, the results, and the installation certification expiry date*
- the serial numbers of all components in the metering installation*
- any non-compliances and the action taken to remedy the non-compliance*
- the name of the inspector and the date on the inspection.*

Audit observation

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit commentary

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit outcome

Not applicable

6.4 Provide Inspection Report To MEP (Clause 44(3) Of Schedule 10.7)

Code related audit information

The ATH must, within 10 business days of carrying out the inspection, provide the inspection report to the MEP.

Audit observation

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit commentary

Wells has not conducted any inspections under their ATH, only as a contractor to other ATHs.

Audit outcome

Not applicable

6.5 Inspections for Category 2 & Above Installations (Clause 46(2) of Schedule 10.7)

Code related audit information

When carrying out an inspection of a category 2 or higher metering installation, the ATH must also conduct the following additional checks:

- a visual inspection of each metering component in the metering installation for damage, tampering, or defect*
- if the current transformer can be safely accessed, check the position of the current transformer tap to ensure it is still appropriate for the expected maximum current for the metering installation*
- check for the presence of appropriate voltages at the metering installation*
- check the voltage circuit alarms and fault indicators.*

Audit observation

Wells has not conducted any Category 2 or above inspections.

Audit commentary

Wells has not conducted any Category 2 or above inspections.

Audit outcome

Not applicable

7. PROCESS FOR HANDLING FAULTY METERING INSTALLATIONS

7.1 Investigation of Faulty Metering Installations (Clause 10.43(3) of Part 10)

Code related audit information

As a participant, the ATH must inform the MEP if it believes a metering installation is faulty, inaccurate, defective, or not fit for purpose.

Audit observation

I checked Wells' process documentation and one example to confirm compliance.

Audit commentary

Wells has a process which is compliant with the Code. One recent example was examined which contained sufficient detail for the MEP.

Audit outcome

Compliant

7.2 Testing of Faulty Metering Installations (Clause 10.44 of Part 10)

Code related audit information

When advised by an MEP that a metering installation is faulty, inaccurate, defective, or not fit for purpose, the ATH must test the metering installation as soon as practical and provide a statement of situation.

Audit observation

I checked Wells' process documentation to confirm compliance.

Audit commentary

Wells has a process which is compliant with the Code. One recent example was examined which contained sufficient detail for the MEP.

I have considered whether Wells was required to notify the relevant MEPs that the installations mentioned in **sections 5.1 and 5.40** were not fit for purpose. The metering installations mentioned in **section 5.1** are deemed inaccurate because they are outside the accuracy tolerances of Table 1. The accuracy tolerances include uncertainty, not just the overall error.

The installations mentioned in **section 5.40** are deemed to be "not fit for purpose" because of low CT burden, therefore certification is cancelled. The Authority has clarified that non-compliance exists in this situation and that certification is cancelled for installations where low burden is not addressed, therefore I have concluded that Wells should have notified the relevant MEPs.

Audit outcome

Non-compliant

Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: Clause 10.43(3) of Part 10</p> <p>From: 01-Dec-17</p> <p>To: 19-Nov-18</p>	<p>MEP not notified that 11 metering installations with measurement uncertainty greater than 0.6% are inaccurate and therefore have certification cancelled.</p> <p>MEP not notified that five metering installations with low burden 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		
Medium	<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	Remedial action status
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-22-19	

7.3 Statement of Situation (Clause 10.46(1) of Part 10)

Code related audit information

The ATH must include the following in the statement of situation:

- the details and results of the tests carried out
- a conclusion, with reasons, as to whether or not the metering installation is faulty
- an assessment of the risk to the completeness and accuracy of the raw meter data
- the remedial action proposed or undertaken
- any correction factors to apply to raw meter data to ensure that the volume information is accurate
- the period over which the correction factor must be applied to the raw meter data.

Audit observation

I checked Wells' process documentation to confirm compliance.

Audit commentary

Wells has a process which is compliant with the Code. One recent example was examined which contained sufficient detail for the MEP.

Audit outcome

Compliant

7.4 Correction of Defects (Clause 10.47 of Part 10)

Code related audit information

When taking action to remedy an inaccuracy or defect within a metering installation, the ATH must ensure that records of any modifications that are carried out to the metering installation are kept for each metering component of the metering installation in the metering records and in a manner reasonable in the circumstances to ensure that further investigation can be carried out.

Audit observation

I checked Wells' process documentation to confirm compliance.

Audit commentary

Wells has a process which is compliant with the Code. One recent example was examined which contained sufficient detail for the MEP.

Audit outcome

Compliant

8. Conclusions

The audit report records 13 non-compliances in relation to three main areas, as follows:

1. Whilst error and uncertainty calculations for category 2 comparative certification are now being conducted in accordance with the requirements of the Code, the audit found that 11 of 23 certification reports showed uncertainty figures greater than 0.6%. Whilst the total error was within 2.5%, the Code also contains a threshold for uncertainty. The Code also states that these installations are deemed to be "inaccurate" leading to cancellation of certification and requiring notification to the MEPs. The metering installation certification reports lack the required clarity to easily identify the error and uncertainty results and whether the installations have passed or failed the certification tests.
2. Wells has not confirmed the accuracy of non-TWS CTs when the in-service burden is lower than the lowest test point recorded in the IEC standard. A process has been developed for installing burden resistors, but this was not used for five of seven installations checked during the audit. The process used is not considered compliant because the resistors are installed at the test facility, which means it cannot be used for its stated purpose.
3. The maximum interrogation cycle is not always recorded in certification reports.

Six recommendations are made. Three are in relation to the lack of clarity with metering installation certification reports. The most important recommendation is that Wells engage with the Measurement Standards Laboratory (MSL), to develop a robust and enduring measurement uncertainty management capability for Category 2 metering installations.

During the previous audit it was found that ICP 0005170923RN2E6 was comparative certified on 02/03/16 for two years, despite a measured error of 32.39% fast. The certification report was provided to the MEP and I notified both the Trader and MEP that remedial action was required. This installation has still not been recertified and I have notified the Trader and MEP again. This installation has now been over recording for 32 months.

The date of the next audit is determined by the Electricity Authority and is dependent on the level of compliance during this audit. The table in the executive summary provides some guidance on this matter and recommends a next audit frequency of three months. I recommend a nine month audit period to provide enough to resolve the matters identified, because new processes need to be established and some metering installations will require recertification.

9. Wells Response

1. We acknowledge that at the time of the Cat-2 installation certifications in question, error and uncertainty was, for some working standards, being shown as greater than 0.6%, and there was no flag to the technician that certification should not proceed. Subsequent refinements to the working standard certification reports and the use of the figures contained within them for the calculation of site certification error and uncertainty have shown them to actually be safely below 0.6%.

Hioki Unit with 500A Clamp Set	% @ 22°
2	0.33
3	0.37
4	0.26
6	0.26
7	0.30
8	0.38
9	0.29
10	0.30
11	0.26

Modifications to the workflows and reports are being initiated to both better illustrate to the technician if the temperature adjusted value increases above 0.6%, and to prevent the certification process from proceeding under these conditions.

As a side-note, we are a little perplexed at how over half of the risk rating points are due to an issue that was not going to result in inaccurate installations, with the overall site error requirement still being met, and where the root cause of the issue was purely a numeric issue that has already been addressed, as indicated in the table above.

2. We acknowledge that there have been some installations with Non-TWS CTs and low burden certified without burden resistors being added, and modifications to the workflows are being initiated to both better illustrate to the technician if the calculated actual burden is below the minimum threshold to prevent the certification process from proceeding under low burden conditions, and to allow for a subsequent calculation once burden resistors have been added.

At this point we dispute that our burden resistor installation method is non-compliant, on the grounds that we have yet to find or be provided with either details of how a test facility *“should”* be used, or a details of how burden resistors *“should”* or *“should not”* be installed. We are in the process of requesting that our MEP clients provide us with their preferred approach from the following options when Non-TWS CTs are found to not pass the minimum burden test

- Schedule a shutdown through the retailer to replace the CTs
- Install Burden Resistors
 - At the Test Block without needing to schedule a Shutdown
 - At the CTs
 - Without a Shutdown if the CT terminals can be accessed safely
 - With a shutdown scheduled through the Retailer if the CT terminals cannot be accessed safely
 - In a standalone enclosure adjacent to the Test Block without needing to schedule a Shutdown, but noting that there will be additional T&M costs, and space constraints could sometimes be an issue

As a side-note, we feel that the attempts we have made over the past year to finding an effective and pragmatic solution to what is acknowledged as being an industry-wide challenge have put us in a “worse” situation than before.

3. The instances of Maximum Interrogation Cycle not being recorded were all on jobs performed under one of the two specific workflows, where the workflow's Maximum Interrogation Cycle field was not setup as being a mandatory requirement, as it is in other workflows. This has already been changed since the audit to ensure that the technician must select a value for this field before the job can be completed.