

Compliance plan for Bluecurrent Ath March 2024

Provision of Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 10.6 of Part 10</p> <p>From: 01-Aug-22</p> <p>To: 06-Mar-24</p>	<p>Incorrect data in some metering installation certification reports, as recorded in other sections.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
As indicated in the individual sections	TBA	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Majority of the issues were exceptions that occurred up to a year ago. Since then, there have been improvements and process and the test sheets automation.</p> <p>There are several outstanding changes from the previous audit that are still in work due to organization priorities as the changes require constrained IT resource for development and testing. These issues have been defined and are in the backlog for development.</p>	TBA	

Metering Installation Type			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 8(2) of Schedule 10.7</p> <p>From: 01-Aug-22</p> <p>To: 06-Mar-24</p>	<p>Each service's access interface not recorded correctly for 19 of 66 metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as moderate as not all Bluecurrent processes have been updated to correctly record each service's access interface and installation type.</p> <p>There is no impact because the MEP normally determines the location of the services access interface and metering installation type; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Now aware of the AMCI recommendation from last MEP audit so report template will be updated to reflect Local/Remote capability.		31/3/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Have made AMCI aware of the expectation that outcomes affecting ATH are expected to be passed on. Will also review final MEP reports to identify any potential impacts in the future.		31/3/2024	

Services Access Interface		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 10 of Schedule 10.4 From: 01-Aug-22 To: 06-Mar-24	Each service's access interface not recorded correctly for 19 of 66 metering installations. Potential impact: Low Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as not all Bluecurrent processes have been updated to correctly record each service's access interface. There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
As 3.2	As 3.2	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As 3.2	As 3.2	

Meter Requirements			
Non-compliance		Description	
Audit Ref: 3.11 With: Clause 26 (4) of Schedule 10.7 From: 01-Aug-22 To: 06-Mar-24		19 metering installation certification reports with maximum interrogation cycle incorrectly recorded. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are recorded as moderate because there is room for improvement. There is very little impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
As 3.2		As 3.2	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As 3.2		As 3.2	

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 36(3) & (4) of Schedule 10.7 From: 01-Aug-22 To: 06-Mar-24	Maximum interrogation cycle not recorded for each services access interface in 19 metering installation certification reports. Potential impact: None Actual impact: None Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate because there is room for improvement. 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
As 3.2	As 3.2	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As 3.2	As 3.2	

ATH must not Certify Metering Installations under Certain Circumstances		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 8(1) Of Schedule 10.7 From: 29-Jun-22 To: 06-Mar-24	ICP 0000005594UN22E certified despite the burden being lower than 25% of the rated burden. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the certification report clearly indicates the tests have failed. The fact this issue was not identified is an isolated exception. The impact on settlement and participants is minor; therefore, the audit risk rating is low. The overall error of the installation is 0.267%.	
Actions taken to resolve the issue	Completion date	Remedial action status
Site will be decertified and return to site to add required burden and recertification.	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No change required; validators reminded of process requirements.	6/3/2024	

Certification Tests		
Non-compliance	Description	
Audit Ref: 5.12 With: Clause 9(1)(ii)(B) of Schedule 10.7 From: 01-Aug-22 To: 06-Mar-24	ATH did not record the accumulation of pulses, register advance or minimum load when conducting raw meter data tests for Category 1 installations. Potential impact: Low Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as the Bluecurrent process does ensure that testing is conducted but does not meet all of the requirements of the 1 February 2021 Code changes with regard to recording results. The impact is low as the Bluecurrent process has ensured that testing has been conducted; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Current work program to implement into the field app and the generated Certification Reports, due to delays and prioritization this was rolled out as a manual process recorded in the job notes, but not able to be linked to the certification report.	30/4/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	30/4/2024	

Insufficient Load		
Non-compliance	Description	
Audit Ref: 5.25 With: Clause 14 of Schedule 10.7 From: 12-May-22 To: 06-Mar-24	Insufficient load tests not conducted for ICP 0006182453RNFA4. Potential impact: Medium Actual impact: Unknown Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because there is a robust process in place and this example appears to be an exception. The impact on settlement and participants is unknown, so I have recorded the impact as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Site to be investigated and possible return to site to fully certify	TBA	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Validators reminded of process	6/3/2024	

Record Metering Installation Compensation Factor			
Non-compliance	Description		
<p>Audit Ref: 5.32</p> <p>With: Clause 24(2) Of Schedule 10.7</p> <p>From: 07-Nov-23</p> <p>To: 06-Mar-24</p>	<p>Two different compensation factors (40 and 100) are recorded in the metering installation certification report for ICP 0000001305RC766.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because there are tests to confirm the correct compensation factor.</p> <p>The impact on settlement and participants could be medium. In this case the impact is unknown, and the issue has been raised with the MEP. I have recorded the impact as low until the investigation is complete.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Both the validators and the TOU team have been advised on this mistake. Certificate to be amended and reissued.		30/3/2024	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Validators reminded of process		6/3/2024	

Measuring Transformers Used in A Certified Metering Installation		
Non-compliance	Description	
Audit Ref: 5.37 With: Clause 28(4)(i) Of Schedule 10.7 From: 29-Jun-22 To: 06-Mar-24	Burden not within the allowable range for ICP 0000005594UN22E. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the certification report clearly indicates the tests have failed. The fact this issue was not identified is an isolated exception. The impact on settlement and participants is minor; therefore, the audit risk rating is low. The overall error of the installation is 0.267%.	
Actions taken to resolve the issue	Completion date	Remedial action status
As per 5.1	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per 5.1	6/3/2024	

Burden & Compensation		
Non-compliance	Description	
Audit Ref: 5.40 With: Clause 31 of Schedule 10.7 From: 29-Jun-22 To: 06-Mar-24	Burden not within the allowable range for ICP 0000005594UN22E. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the certification report clearly indicates the tests have failed. The fact this issue was not identified is an isolated exception. The impact on settlement and participants is minor; therefore, the audit risk rating is low. The overall error of the installation is 0.267%.	
Actions taken to resolve the issue	Completion date	Remedial action status
As per 5.1	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per 5.1	6/3/2024	

Data storage device requirements			
Non-compliance	Description		
<p>Audit Ref: 5.45</p> <p>With: Clause 5(1) of Schedule 10.8</p> <p>From: 01-Aug-22</p> <p>To: 06-Mar-24</p>	<p>ATH has not ensured Series 3 EDM1 meters comply with the type-test requirements because EDM1 has not supplied type test reports.</p> <p>50 of 66 certification reports do not record the validity period.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong, because the type tests have been requested.</p> <p>The impact on settlement and participants is unknown until the type test reports can be read and approved; therefore, I have recorded the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A review was done to determine if all the appropriate standards had been tested to as indicated by the first pages of the report provided, but the manufacturer refused to provide the full copies of the reports.		2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The MEP has been advised on the requirement for full type test reports		2023	

Measuring Transformer Certification		
Non-compliance	Description	
Audit Ref: 5.67 With: Clause 3(c)(ii) of schedule 10.8 From: 01-Aug-22 To: 06-Mar-24	CT validity period not recorded for 14 CT certification reports. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because all of the other parts of this clause have been complied with and the certification expiry dates are correct. There is no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The code is saying the report must include the certification validity period, it does not ask for a statement on the validity period, The report gives the 'Cert Date' and 'Expiry Date' which together gives the validity period. As the component certification reports are specific to each metering installation there are no multiple categories per component to worry about.	TBA	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Believe current implementation fulfils the code requirements	TBA	

Control Device Certification		
Non-compliance	Description	
Audit Ref: 5.70 With: Clause 4(2)(b) of Schedule 10.8 From: 01-Aug-22 To: 06-Mar-24	Two control device certification reports do not contain the validity period. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because compliance is achieved with all other parts of this clause. There is no impact; therefore, the audit risk rating is low. All certification expiry dates were correct.	
Actions taken to resolve the issue	Completion date	Remedial action status
As per 5.67	TBA	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
As per 5.67	TBA	