

Compliance Plan for FCLM MEP – January 2020

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Jan-19 To: 22-Nov-19	Registry not always updated as soon as practicable in some cases. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as moderate because there is room to improve processes. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Updated ICPs with cancelled certification		31/01/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Review process to cancel certification if an inspection is not completed. Implement better controls to avoid future non compliance.		30/06/2020
		Identified

Registry Notification of Metering Records			
Non-compliance		Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jan-19 To: 22-Nov-19		76 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are in place to ensure the timeliness of updates, but FCLM is often prevented from updating the registry due to late field notification. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
Working with FSPs to deliver paperwork within the required time frames and retailers for MEP nominations. Significant improvement has been made.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue monitoring and notifying participants when late nominations or install data occur.		Ongoing	

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-Jan-19</p> <p>To: 22-Nov-19</p>	<p>Some records updated on the registry later than 10 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 in this area because they reduce risk most of the time but there is still room for improvement, especially with new connection updates.</p> <p>The late updates for new connections occurred after the trader had populated their records, therefore the impact on participants, customers or settlement is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Investigate audit data to identify all causes of late updates.</p> <p>A large number were due data clean up where the last event date was used and therefore will always exceed 10 business days.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Continue to work with Retailers and FSPs for timely data.</p> <p>Review internal processes and modify where required to meet the timeframes.</p> <p>For data cleansing we would like to seek clarification on what event date should be used.</p> <p>A – The date of the last event that was incorrect</p> <p>B – The date the data is corrected and sent to the registry.</p> <p>Note - If the data effects other participants the event date must reflect the actual effected date. i.e this will always be non-compliant.</p>		Ongoing
		Investigating

Accurate and Complete Records			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1) of Schedule 10.6</p> <p>From: 01-Jan-19</p> <p>To: 22-Nov-19</p>	<p>Metering records not populated on registry for 3 ICPs.</p> <p>Some CT information is missing for 9 ICPs.</p> <p>Some inaccurate certification records.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 because there is room for improvement.</p> <p>There is a minor impact on other participants; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The data not held are for Non AMI ICPs. FCLM is in the process of upgrading all meters to AMI . Accurate data is obtained from the new install details sent from our FSPs.</p> <p>As results show considerable improvement has been made.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ensuring FSPs supply complete metering records.		Ongoing	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Jan-19 To: 22-Nov-19	Five late MN files. Potential impact: Low 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 they mitigate risk to an acceptable level. There was no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
MNs were updated		
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to improve the MN process		Ongoing
		Identified

Provision of Registry Information			
Non-compliance	Description		
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Jan-19</p> <p>To: 22-Nov-19</p>	<p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong in this area. The number of discrepancies is very small.</p> <p>Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Updated input errors .		31/01/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AMI and compliance rollout projects planned to upgrade all other errors.		Ongoing	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Jan-19</p> <p>To: 22-Nov-19</p>	<p>Certification cancelled and registry not updated for:</p> <p>3 installations not monitored since insufficient load certification was completed;</p> <p>3 installations not fit for purpose due to low burden;</p> <p>20 installations without inspections conducted within the allowable window; and</p> <p>1 category 2 installation outside accuracy tolerances.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as weak in this area because in most cases, the registry is not populated with the correct expiry date when certification is cancelled.</p> <p>The issues found can all potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>The majority of the non compliances are for ICPs identified in the audit due to inspections not carried out on time and certification cancelled. The records have been amended.</p> <p>In regards to the potential blown fuse this was recertified at the time and confirmed now working, issue was resolved at time and site made compliant</p>		31/01/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The three cat 2 sites were done by VCOM and we will be revisiting there end to end testing process</p> <p>Review inspection process to remove the non compliances.</p>		Ongoing
		Identified

Certification and Maintenance			
Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7</p> <p>From: 01-Jan-19</p> <p>To: 22-Nov-19</p>	<p>Certification cancelled or expired for 2,468 ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>I have recorded the controls as moderate in this area because certification has been expired for a number of years for some ICPs and because some of the expired installations were fully certified at one point.</p> <p>The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Statistical Sampling – Began 12 months ago but ran in to resource issues . Sampling is now in progress.</p> <p>AMI rollout project to replace all non AMI meters . We have increased our resources , namely purchase of Trustpower test house and contracts with more FSPs so we are better resourced to carry out compliance work.</p> <p>Cat 2 non compliant and 40 with time clocks not checked will be high priority.</p> <p>Note – IHUB has a rollout project in place that will also reduce a number of non compliant meters.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Compliance reporting and planning in place to maintain metering compliance.		Ongoing	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) From: 01-Jan-19 To: 22-Nov-19	Component certification test not completed. 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 and the process has been corrected since the ATH audit. The accuracy of the meter is unlikely to have been affected and the consumption recorded on a BTS is minimal, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
TRUM: Process has now been changed however as BTS have minimal consumption the risk here is low as a BTS meter only uses approx 30units a month for a period of 3-4 months		20/12/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Changed TRUM process to FCLM process for BTS installations		20/12/2019
		Cleared

Insufficient Load for Certification Tests			
Non-compliance	Description		
Audit Ref: 7.7 With: 14(3) and (4) of Schedule 10.7 From: 01-Jan-19 To: 22-Nov-19	Monitoring not conducted of 3 installations certified with insufficient load. Potential impact: Medium Actual impact: Low Audit history: Multiple times 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. The issues found can all potentially have an impact on other participants and on settlement. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Monitoring the load so complete testing can be carried out.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Notify FSPs that FCLM do not use this method of certification Please notify FCLM if unable to use a load bank.		Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Jan-19 To: 22-Nov-19	40 meters with timeclocks not checked every 12 months. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There isn't a process in place to check the time setting on these meters. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
These meters are non AMI and will be high priority to change out. We have replaced 34 since the last audit but have identified others.		30/04/2020
Preventative actions taken to ensure no further issues will occur		Completion date
These type of meters are not used anymore.		Complete
		Identified

Metering Installations Incorporating a Meter		
Non-compliance	Description	
Audit Ref: 7.15 With: Clause 26(1) of Schedule 10.7 From: 01-Jan-19 To: 22-Nov-19	Meter not certified. 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 and the process has been corrected since the ATH audit. The accuracy of the meter is unlikely to have been affected and the consumption recorded on a BTS is minimal, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Changed TRUM process to FCLM process for BTS installations.		20/12/2019
Preventative actions taken to ensure no further issues will occur		Completion date
FCLM BTS process uses a new calibrated meter for each installation.		20/01/2019
		Cleared

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 22-Nov-19	829 ICPs with expired interim certification. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate in this area because certification has been expired for four years for these ICPs. The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
As per clause 7.1		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We don't acknowledge this rule as relevant and is covered by clause 7.1 Therefore the risk rating should not applied as it is already applied .		Date
		Disputed

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 01-Jan-19 To: 22-Nov-19	Inspections not conducted within the allowable window for 20 installations. Potential impact: Medium 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. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Some of the cat 2 inspections were not carried out due to them being scheduled by IHUB for displacement.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Will look to improve controls		Date
		Investigating

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8 of Schedule 10.6 From: 01-Jan-19 To: 22-Nov-19	913 ICPs not read during the maximum interrogation cycle. Potential impact: High Actual impact: Medium Audit history: Three times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate because reporting is in place but there is room for improvement to ensure all AMI installations are successfully interrogated. The impact on settlement is considered moderate, because some traders will be required to estimate data. The impact on traders and customers is also moderate because some customers will be required to switch retailers if AMI data is not available. The audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
An error had occurred analysing the reconciliation report that is used to identify sites outside there cycle .This has now been rectified and the registry updated . Note – 164 meters out of the 913 are now communicating .		31/01/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Report error noted and corrected.		20/01/2020
		Cleared

Time Errors for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.7</p> <p>With: Clause 8(4) of Schedule 10.6</p> <p>From: 01-Jan-19</p> <p>To: 22-Nov-19</p>	<p>Clock errors greater than the threshold for 23 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations.</p> <p>The errors were all small and none were across a trading period, therefore there is no impact on participants or settlement. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Meters communicating regularly are adjusted and do not exceed the limits. Non communicating meters that begin communicating may fall into the error category and adjusted accordingly.</p> <p>Initial time adjustment is carried out on installation if required.</p> <p>We believe these should not be included as a non compliance</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Seek advice from the EA on what other action is required.		Ongoing
		Identified