

Compliance Plan for Nova MEP – March 2020

Registry Notification of Metering Records			
Non-compliance		Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jan-19 To: 11-Dec-19		Some registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		I have recorded the controls as strong in this area because Nova has implemented changes to improve their ability to ensure timely updates of the registry. 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
An electronic process has been utilised to process bulk AMI deployment metering paperwork, and resource levels have increased to ensure timely processing of any manual systems.		Complete	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Visibility of metering paperwork received by ATH for validation, highlights any potential backlog. A processing spreadsheet automatically calculates timeline of install date to processing date to highlight any patterns of non compliance.		Complete	

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: 11-Dec-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: 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 because Nova has implemented changes to improve their ability to ensure timely updates of the registry.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
An electronic process has been utilised to process bulk AMI deployment metering paperwork, and resource levels have increased to ensure timely processing of any manual systems.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Visibility of metering paperwork received by ATH for validation, highlights any potential backlog.</p> <p>A processing spreadsheet automatically calculates timeline of install date to processing date to highlight any patterns of non compliance.</p> <p>Discrepancy reporting is completed every 10 days to ensure any corrections required are completed within EA timeframes.</p>		Complete
		Cleared

MEP Response to Switch Notification		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: 1(1) of Schedule 11.4</p> <p>From: 03-Aug-18</p> <p>To: 11-Dec-19</p>	<p>Two late MN files.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 they mitigate risk to an acceptable level.</p> <p>There was no impact; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>0011004386PC9F4 – This ICP was selected for bulk deployment. The late MN acceptance occurred when the site switched from Nova to another Trader and the original BOPE MEP nomination was removed. The ICP failed to be recalled from deployment so we requested a back dated MEP nomination from the new Trader.</p> <p>1000022281BPDBA – BOPE was MEP nominated for this ICP by Genesis in 2018. At the time BOPE didn't accept MEP nominations from other Retailers (given BOPE didn't provide MEP services to other retailers) and doesn't send a Rejection MN file which is required to clear the nomination from the Registry. The site then switched Traders to Todd in 2019 and we accepted the original 'uncleared' MEP nomination in error.</p>		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
<p>A report is run twice weekly to identify trader switches on Nova ICPs selected for deployment. These ICPs are recalled from deployment ensuring BOPE meter changes do not occur on these sites.</p> <p>The MN Breach file is checked every 5 days to ensure MEP nominations are accepted in a timely manner.</p>		Complete
		Cleared

Provision of Registry Information			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Apr-18 To: 11-Dec-19	Some registry records incomplete or incorrect. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area because there were only a small number of issues and these were all known to Nova and have been corrected. The discrepancies may have a minor impact on tariff and therefore billing accuracy. The audit risk rating is therefore low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Discrepancies have been investigated and corrected		01/03/2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Regular discrepancy reports are reconciled, and self audits are completed on AMI data to ensure any errors are picked up and corrected.		Complete	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Nov-18 To: 30-Apr-19	Discrepancy report not run for five months. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls strong. Whilst the discrepancy reporting did not occur for a period of five months. Nova has a process for completing discrepancy reporting which has been followed since mid 2019. Analysis of the registry information has confirmed a high level of accuracy, therefore the impact on participants is likely to be minimal. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We now have adequate resourcing levels to manage increased deployment workload and maintain regular discrepancy reporting		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Discrepancy reporting is run fortnightly to enable corrections to be made within registry timeframes. We have not had any backlog since May 2019		Complete
		Cleared

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-Apr-15</p> <p>To: 11-Dec-19</p>	<p>Certification expired for 56 ICPs.</p> <p>Potential impact: High</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 because Nova has engaged in correspondence with Retailers for a long period of time to attempt to get access.</p> <p>The impact on settlement is recorded as low. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification, but the quantity is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Continued follow up with retailers to gain access to installations, and recertification procedure followed in 2018		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monthly reporting identifies sites with expired certification. A Recertification SOP outlines procedure for identifying ICPs and notifying traders of impending recertifications.		Ongoing	

Interim Certification			
Non-compliance	Description		
Audit Ref: 7.18 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 11-Dec-19	37 ICPs with expired interim certification. Potential impact: High Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong because Nova has engaged in correspondence with Retailers for a long period of time to attempt to get access. The impact on settlement is recorded as low. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification, but the quantity is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Continued follow up with retailers to gain access to installations		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monthly reporting identifies sites with expired certification. A Recertification SOP outlines procedure for identifying ICPs and notifying traders of impending recertifications.		On-going	

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-Apr-18</p> <p>To: 11-Dec-19</p>	<p>Clock errors greater than the threshold for 5 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 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
Clock sync errors are reported on daily and exception reporting delivered to retailers.		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Reporting will pick up any repetitive clock sync errors outside the threshold, and if it occurs more than 5 times the meter is replaced.		Complete
		Identified