

Compliance plan for SmartCo MEP – 2020

Participants to Provide Accurate Information			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-May-19 To: 19-May-20	Registry not always updated as soon as practicable by SmartCo. 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	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	Remedial action status
As mentioned in section 6, we have made significant steps in removing all IN24 register content codes over the past 6 months, the remaining ones will be cleaned up over the coming weeks. We wanted to clean up the IN24 ICPs to remove any confusion before addressing the 305 ICPs that should be INEMO and not UN24. This will happen shortly.		31/07/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Weekly reporting has been put in place and additional training for staff to ensure they identify any correct exceptions, i.e. UN24 with a load control device.		Completed	

Registry Notification of Metering Records			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-May-19</p> <p>To: 30-Mar-20</p>	<p>Some registry updates later than 15 business days.</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>Controls are in place to ensure the timeliness of updates, but SmartCo is often prevented from updating the registry due to late field notification.</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	Remedial action status
<p>The reason for the percentage successful drop is due to the SMCO transition program, this is an ongoing process to update ICPs and assets to SMCO owned in our system and the registry.</p> <p>In order to manage this efficiently, we receive a list of sites where the metering has been deployed and this list goes through a series of data validations before we can update the metering in our system. Due to the validations needed we run this process once a month. We also notify the retailer before we run the process so that they can nominate SMCO. The date we install in our system becomes the agreed transition date from the previous MEP to SMCO.</p> <p>For the majority of sites, the previous MEP has already updated the registry with the smart ready assets from the install date however they are not considered SMCO sites until the transition process has been run in our system. Due to this we use the event date and installation date of when the assets are updated in our system, not the physical install date.</p> <p>We are investigating ways of improving the transition process to meet compliance.</p>		30/08/20	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>This is a known process and once complete, there will be no further issues however, we are investigating ways of improving the transition process to meet compliance.</p>		30/08/20	

Metering Installation Design & Accuracy		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 4(1) of Schedule 10.7</p> <p>From: 06-Aug-18</p> <p>To: 30-Mar-20</p>	<p>Two metering installations with errors greater than 2.5%.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as strong because the issues were identified immediately.</p> <p>There is a moderate impact on metering installation accuracy; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
Both sites require a shutdown to replace the CT's, this is currently with the Retailers and Customers to arrange a suitable time to return. Unfortunately, as MEP, SmartCo does not have a direct relationship with the customer therefore we are reliant on the retailer arranging access for us under clause 10.7 (2).		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Both ICPs were incorrectly certified by the same test house, we have discussed this issue with them and provided further comms to all ATHs to ensure they do not recertify at all. In both cases our back-office processes picked up the errors and corrected the cert dates immediately. SmartCo does not have a direct relationship with the customer therefore we are reliant on the retailer arranging access for us under clause 10.7 (2).		Ongoing
		Identified

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-May-19</p> <p>To: 30-Mar-20</p>	<p>Some records updated to the registry later than 10 business days.</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 because they mitigate risk to an acceptable level.</p> <p>Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>As per the non-compliance in clause 3.2, for some of the sites in the SmartCo transition the previous MEP hadn't updated the registry with the smart ready assets from the install date however they are not considered SMC0 sites until the transition process has been run in our system. Due to this we use the event date and installation date of when the assets are updated in our system, not the physical install date. As mentioned earlier, for efficiency these were initially updated in bulk monthly so some will be over the allowable time, however we are investigating ways of improving the transition process to meet compliance.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>This is a known process and once complete, there will be no further issues however, we are investigating ways of improving the transition process to meet compliance.</p>		Ongoing
		Investigating

Accurate and Complete Records		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1)(a) and (b) of Schedule 10.6</p> <p>From: 01-May-19</p> <p>To: 30-Mar-20</p>	<p>Certification records not accurate and complete for 59 of a sample of 72.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls require strengthening to ensure record accuracy issues are identified as soon as possible.</p> <p>The impact is minor for most fields. Incorrect certification methods can be misleading and can lead to re-work.</p>	
Actions taken to resolve the issue		Completion date
I checked a sample of the 59 and the above information appears correct on the registry. This will be raised at our monthly tech forums in which all ATHs attend to ensure they understand what to record on their certs.		17/06/20
Preventative actions taken to ensure no further issues will occur		Completion date
Discussed the errors with the ATHs at the June 17 th technical forum, and clarified with all ATHs they must provide the correct information on their certification records.		17/06/20
		Identified

MEP Response to Switch Notification			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 1(1) of Schedule 11.4 From: 01-Jun-19 To: 13-Jan-20	4 late MN files. 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 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	Remedial action status
This process is automated already, we will review the 4 to see if anything obvious as to why they were late and whether we can adjust process to capture these going forward.		Completed	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Fully automated process.		Completed	

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-May-19</p> <p>To: 19-May-20</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: 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. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have made significant steps in removing all IN24 register content codes over the past 6 months, the remaining ones will be cleaned up over the coming weeks.</p> <p>We wanted to clean up the IN24 ICPs to remove any confusion before addressing the 305 ICPs that should be INEM0 and not UN24. This will happen shortly.</p>		31/07/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Weekly reporting has been put in place and additional training for staff to ensure they identify any correct exceptions, i.e. UN24 with a load control device.</p>		Completed	

Correction of Errors in Registry		
Non-compliance	Description	
<p>Audit Ref: 6.3</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-May-19</p> <p>To: 30-Mar-20</p>	<p>Discrepancies not resolved within 5 business days.</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 because there is a thorough process to identify errors and steps are taken to correct errors as quickly as possible.</p> <p>Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
We have a thorough process where we reconcile data between our systems and the Registry daily, however some updates still occur after 5 days, often this is due to reliance on third parties.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to reconcile daily and update within the required timeframes. Chase those cases where third parties are requested for information.		Ongoing
		Remedial action status
		Identified

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-May-18</p> <p>To: 18-May-20</p>	<p>Certification cancelled, and registry not updated within 10 business days for 33 ICPs with low burden.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have recorded the controls as moderate in this area because most processes are managed with sufficient controls to avoid cancellation of certification.</p> <p>The installations with low burden are all recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for SmartCo is to cancel certification on the registry once they know certification is cancelled and the impact of not doing this is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The above ICPs will be reviewed again to confirm none are the TWS 500/5 CTs, and where required, cancellation will take place and recertification work orders raised.		31/07/20
Preventative actions taken to ensure no further issues will occur		Completion date
ATHs and MEPs are currently working together to establish a common burdening process, ATHs are more aware of the issues around burdening now. This is a regular agenda item at the technical forums hosted by Vector metering and attended by all field service providers.		Ongoing
		Identified

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a) From: 23-Apr-18 To: 30-Mar-20	Certification expired for eight ICPs. Potential impact: High Actual impact: Medium Audit history: Once Controls: Strong Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as strong in this area because processes are in place to ensure certification is in place and is cancelled when required. The impact on settlement is recorded as moderate because two installations have inaccurate metering installations; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
Most of these are reliant on customers completing work on the switchboard, after which time the retailer can make them available for recertification. We regularly monitor these and chase retailers for updates.		31/07/20
Preventative actions taken to ensure no further issues will occur		Completion date
We will chase up access for these sites again and if available, recertify. We regularly run an audit compliance report to ensure expiring sites are addressed prior to their expiry date.		Ongoing
		Identified

Certification Tests			
Non-compliance	Description		
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 07-Jan-20 To: 26-May-20	Certification tests not completed for one metering installation. Potential impact: Medium Actual impact: Low 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 in this area because the ATH processes ensure certification tests are completed most of the time. The impact is minor as the metering accuracy is unlikely to be affected; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The ratio check testing was discussed with the ATH prior to this audit and they understand it is required. Ongoing training of field techs will continue to correct these one off instances.		31/07/20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional training for field techs, sample audit of certs to ensure training is effective.		30/08/20	

Insufficient Load for Certification Tests		
Non-compliance	Description	
Audit Ref: 7.7 With: Clauses 14(3) and (4) of Schedule 10.7 From: 31-Mar-20 To: 05-Jun-20	Monitoring not conducted for one ICP certified with insufficient load. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as moderate because they mitigate risk most of the time, but some issues still occur. The impact is minor as only one ICP is affected and accuracy is unlikely to be affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Review underway to identify why this occurred and whether there are situations where monitoring would be useful.		30/08/20
Preventative actions taken to ensure no further issues will occur		Completion date
Depending on review findings, we will either re-confirm with ATHs that they must attach a load for testing or that the MEP must have process for low load monitoring.		30/09/20
		Investigating

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-May-19</p> <p>To: 30-Mar-20</p>	<p>1,069 examples of clock errors outside the allowable thresholds.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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>I have recorded the controls as strong because clocks are synchronised during every successful interrogation.</p> <p>The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The time sync process is fully automated and when the system detects a time drift over an internally set limit but within the allowable limits set out in Table 1 of clause 8(5) of Schedule 10.6, the system corrects it. Sometimes the drift exceeds the allowable limits, in this situation the system corrects the time and sends out an event file to the relevant retailer.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
The system is designed to capture any drifts before they exceed the allowable limits and for the most part this is the case. Sometimes a meter will drift outside the allowable limits and is immediately corrected, and the retailer informed. This process is 99.99% compliant.		Ongoing
		Identified