

## Compliance plan for Legacy Metering - 2019

Non-compliance	Description		
Audit Ref: 3.2 With: 2 of Schedule 11.4  From: 01-Jan-19 To: 31-Aug-19	255 registry updates later than 15 business days 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, in many cases LMGL updates are late due to late MEP nominations. Audit risk is identified as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Monitor the missing metering reports and workflow returns to ensure all updates to the registry are completed as soon as they become available.		1/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above and continue to feedback to ATHs and retailers regarding the return of workflow and progressing the MEP nominations of issued and returned work.		Ongoing	

Non-compliance	Description		
Audit Ref: 4.10 With: 3 of Schedule 11.4 From: 01-Jan-19 To: 31-Aug-19	255 registry updates later than 10 business days Potential impact: Low 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, in many cases LMGL updates are late due to late MEP nominations. Audit risk is identified as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Monitor the missing metering reports and workflow returns to ensure all updates to the registry are completed as soon as they become available.		1/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above and continue to feedback to ATHs and retailers regarding the return of workflow and progressing the MEP nominations of issued and returned work.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 6.2</p> <p>With: 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Jan-19</p> <p>To: 30-Sep-19</p>	<p>Some registry records are incorrect</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		
<b>Low</b>	<p>Controls are recorded as strong. LMGL keeps good records of each installation, they are able to explain each discrepancy identified by the Audit Compliance report. Many so called-inaccuracies are due to network configurations. LMGL operates on a significant number of networks. The audit risk rating is recorded as low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Complete the update of any obvious errors in return paperwork or other information.		1/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to monitor returns and actively feedback any issues/errors for correction or clarification. Advise networks and retailers where perceived errors appear from their updates.		Ongoing process	

Non-compliance	Description		
Audit Ref: 6.4 With: 20(c)(ii) of Schedule 10.7 From: 01-Jan-19 To: 31-Oct-19	Certification expired for 21,645 ICPs, the registry not updated Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Medium	Controls are recorded as moderate because Legacy Metering are using their best endeavours to resolve the issues. It is an administrative oversight not technical. We recorded audit risk rating as medium because of the number of ICPs effected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Resolution activity between Trustpower, Legacy Metering, and the Authority is underway regarding Project 1. Project 2 ICPs are updated in registry per the agreed approach between Delta ATH and Authority.		Currently underway.	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Project 2 sampling programme recommencing in 2020.		20/08/2020	

Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: 10.38 (a), clause 1 and clause 15 of Schedule 10.7</p> <p>From: 01-Jan-19</p> <p>To: 31-Aug-19</p>	<p>Certification expired or cancelled for 21,867 ICPs</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		
<b>Medium</b>	<p>Controls are recorded as moderate; certification process is managed as circumstances allow. All so-called “easy” installations are certified. As with other MEPs, Audit risk rating is assigned medium because of the high number of ICPs</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
3 x multiplier replacement / revisit programme underway . Cat 2 programme ongoing. Stat sample programme resolutions as described in 6.4 underway.		1/6/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing monitoring of certification status along with the progression of the proactive certification projects. Cat 2 issues remain challenging due to access and complexity of work – but MEP continues to work with retailers and ATHs to resolve.		1/6/2020	