

Compliance plan for IntelliHUB MEP – 2019

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Oct-18 To: 14-Jun-19	10 of 13,236 registry updates late. 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 updates are automated, and the process mitigates risk to an acceptable level. The impact on settlement and participants is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
IHUB have strong controls in place and ensure the quality of data is checked and validated prior to upload to the Registry. IHUB will continue to maintain a high level of compliance for this clause.		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
On average IHUB update metering records within 2 business days and are 99.92% compliant overall. We consider this to be of high standards and will continue to work with ATH's to ensure data is returned within our required timeframes. IHUB are well aware that the target is not 15 business days and will look to propose a performance measure to consider 98% of updates are done within 2 business days.		On-going
		Identified

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: Clause 4(1) of Schedule 10.7</p> <p>From: 15-May-19</p> <p>To: 14-Jul-19</p>	<p>Error and uncertainty calculations incorrect in nine Wells certification reports.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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 IntelliHUB did check the Wells audit report and it recorded compliance for this requirement. It appears that the calculation is not operating as it was when Wells was audited.</p> <p>The impact on settlement and participants is minor because only one installation had an error greater than 2.5%, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>IHUB are working with WELLS to address the issues identified in the Audit. As mentioned by the Auditor, prior to engagement with WELLS for Category 2 sites, IHUB checked audit reports to ensure compliance in this area.</p> <p>WELLS have tried to address Error and uncertainty and have been striving to meet the code requirements. WELLS have endeavoured to include all sources of error and uncertainty and their method of calculation, and calculations based on individual test apparatus (which continued to impact them in this area) however, they believed all outstanding issues have been resolved and identified in their last audit.</p>			Disputed
			<p>Post audit comment by auditor:</p> <p>Wells emailed a formula for calculation of uncertainty. It was intended that this formula would be used in Con-X. I haven't been able to identify a specific error in this formula, but the result from Con-X for the example above does not match my manual calculation.</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>WELLS have advised that calculations put in place on their end was based on feedback provided by the auditor in April 2019.</p> <p>IHUB will request that WELLS make contact with the Auditor to discuss findings found in this audit.</p> <p>Action status=Disputed and unable to advise a completion date to resolve issue or to take preventative action as WELLS latest audit report confirmed 'compliance' in this area.</p>			

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-Oct-18</p> <p>To: 14-Jun-19</p>	<p>Some backdated corrections.</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 there is robust exception validation in place and corrections are made as soon as they are discovered.</p> <p>There was no impact on other participants or on settlement; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
IHUB has a suite of validation rules and checks to ensure compulsory fields are populated and that there are no errors within the data. IHUB will continue to work with Networks to ensure we have the correct information at hand but when the information is not readily available it is often difficult to find the relevant RCC and POA's per network. IHUB will continue to find the best RCC/POA per network but also want support from the EA to address these issues.		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Implemented a process solution to ensure compliance is met for change of settlement indicators.</p> <p>Networks should be more accountable for the RCC's/POA's and this information be made available on the EA website.</p>		On-going
		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-Oct-18</p> <p>To: 14-Jun-19</p>	<p>Small number of registry discrepancies.</p> <p>Potential impact: Low</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 sound validations are in place. The errors found will be added to regular validation processes.</p> <p>There was no impact on other participants or on settlement; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>IHUB have liaised with the EA and participants on numerous occasions to try and determine the best RCC/POA to use.</p> <p>It has been recommended by the EA where a solution is not really suitable but is probably the least confusing option without the creation of a new register content code-to use.</p> <p>The EA also suggested to make an application for a new register content code that better describes the scenario, however, this will take time as consultation and approval will be required.</p> <p>IHUB have tried to determine the best, least confusing option available which may not be the best solution for every participant or Audit as identified in discrepancies above.</p>		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As mentioned in section 4.10; Networks should be more accountable for the RCC's/POA's and this information be made available on the EA website or is it that the MEP should determine these factors based on their metering capability and customer requests as it can be frustrating when trying to find the best solution fit for all participants.</p>		On-going	

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-Oct-18</p> <p>To: 14-Jul-19</p>	<p>Complete registry validation not conducted.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls for data validation in general are strong but this specific check is not conducted as required by the Code.</p> <p>Errors were not identified by the other checks conducted, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
IHUB have sound validation controls in place to identify data errors prior to upload to the Registry. IHUB will continue to validate exceptions by running the MEP audit tool and checking the EDA file to identify discrepancies and resolve within 5 business days.		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
IHUB are currently working on a solution to cater for this clause and accept non-compliance in this area.		2020
		Investigating

Certification and Maintenance		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a)</p> <p>From: 27-Dec-18</p> <p>To: 05-Jul-19</p>	<p>Certification expired for ICP 1000546015PC4AB.</p> <p>Certification cancelled for ICP 0000026334EAF3D due to an error greater than 2.5%.</p> <p>Certification cancelled for eight ICPs with low burden.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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
<p>ICP 1000546015PC4AB certification has been cancelled as the Relay is bridged and IHUB are working with the Trader to raise a Service Order to address the bridging of relay.</p> <p>ICP 0000026334EAF3D – IHUB have addressed with WELLS who will need to discuss calculations used with the auditor as identified in section 4.3; Clause 4(1) of Schedule 10.7.</p> <p>IHUB will work with WELLS to find a solution identified in the audit to address burden. The list of icps used for the IHUB CAT2 trial have been provided to WELLS for comment.</p>		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Error and Uncertainty calculations addressed with WELLS per section 6.4.</p> <p>Low Burden raised with WELLS and IHUB will work closely with WELLS to address the non-compliance identified through our CAT2 trial (of 9 icps). IHUB will also work with WELLS to see if the solution of the standalone burden box would help address this non-compliance and we have also provided WELLS with a copy of the TWS letter addressed to the industry confirming two important points.</p> <p>We have also pointed out to Wells that not all TWS CT's are considered as remaining within class at low burden levels – only non-compensated models.</p>		On-going
		Identified

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.5</p> <p>With: Clause 8(2)(a) of Schedule 10.6</p> <p>From: 01-Oct-18</p> <p>To: 15-Jul-19</p>	<p>Maximum interrogation cycle exceeded for 29 ICPs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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 because manual meter reading processes are in place and submission is NHH, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
IHUB advise the Trader in all cases when a communications issues have been identified. IHUB will wait for a Service Order before attending site to rectify/resolve the communications issue. In the cases as identified through the Audit, IHUB will follow up with the Trader to see if site visits can be organized and where the comms issue cannot be rectified/resolved, IHUB will update the AMI Non Comms flag to Y.		November 2019
Preventative actions taken to ensure no further issues will occur		Completion date
IHUB will adopt an internal process already available to cater for this clause going forward.		August 2019
		Identified