

Compliance Plan for Broadspectrum MEP - September 2019

Audit Requirement			
Non-compliance	Description		
Audit Ref: 1.11 With: Clause 10.17A & 16A.17 From: 28-Jul-19 To: 01-Aug-19	Audit completed late. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Broadspectrum has controls in place to ensure audits are completed on time. The impact is recorded as low because of the short period between the audit due date and audit date.		
Actions taken to resolve the issue		Completion date	Remedial action status
This audit was planned and started prior to the date was required to be submitted, but for circumstances beyond my control, the audit was not completed on time		16/9/19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This audit was not missed, but because of the previously mention circumstances it has not been completed on time		16/9/19	

Participants to Provide Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clauses 11.2 and Clause 10.6</p> <p>From: 26-Nov-14</p> <p>To: 16-Jul-19</p>	<p>All practicable steps have not been taken to ensure information is complete and accurate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak because they will not ensure errors are mitigated.</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
We have not knowingly provided any incorrect information, yes there are some historical problems that may need to be fixed, these are being fixed as they are found.		On-going.
Preventative actions taken to ensure no further issues will occur		Completion date
We are currently concentrating on getting the metering installations up to date and fully certified, as part of this the registry will for these installations will be updated, after completion of the metering installation certifications, we will look into the registry validation process and get this back up and running.		On-going
		Identified

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Nov-18 To: 16-Jul-19	Maximum interrogation cycle not recorded for 3 of 19 records Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
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 is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
As can be seen by the fact that it is only three out of nineteen it shows that recording this is part of the process, but the checking failed to pick up this missing information		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
More rigorous checking of the design reports		On-going
		Identified

Metering Installation Design & Accuracy			
Non-compliance		Description	
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 01-Nov-18 To: 16-Jul-19		Uncertainty calculations not conducted in accordance with the Code. Potential impact: Low Actual impact: Low Audit history: Once 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 is likely to be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
Why are different requirements being put in place when we use our own Test house, The paperwork clearly shows that the error and uncertainty are within the limits for a CAT 2 installation.		N/A	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
None required		N/A	

Installation & Modification of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: Clauses 10.34(2), (2A) and (3)</p> <p>From: 01-Nov-18</p> <p>To: 16-Jul-19</p>	<p>Liaison has not occurred with trader and distributor for two newly installed metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak because there is not a distinct process in place for this.</p> <p>There is unlikely to be any impact, because none of the parties have requested any changes to design, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
While two new connections/ICPs were commissioned these were both at the same site and were extensions to existing agreements already in place and all the requirements were known, and we had obviously discussed it with them for the installation to take place and the calibrations to be completed.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
No additional actions to be taken.		N/A
		Disputed

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-Nov-18</p> <p>To: 16-Jul-19</p>	<p>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: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as weak in this area because they don't seem to be sufficient to minimise late updates.</p> <p>The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We would all like to live in a perfect world, but I have difficulty getting paperwork out of subcontractors in 10 days, let alone updating the registry.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Attempt to get the paperwork from subcontractors quicker		N/A	

Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4</p> <p>From: 01-Nov-18</p> <p>To: 16-Jul-19</p>	<p>Certification records not provided for 9 metering installations.</p> <p>Inspection reports not provided for four metering installations.</p> <p>Potential impact: Low</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 are recorded as weak as some certification reports were not provided.</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	Remedial action status
Historically yes we have managed to loose some inspection/certification reports, but all our installations are certified in our Lotus Notes database, and therefore we have records of the calibrations and the certification of the installations. But the inspection/certification reports may be missing.		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Better record keeping – and obtaining paperwork from the field		On-going	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 1(1) of Schedule 11.4 From: 01-Nov-18 To: 16-Jul-19	2 acceptances later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls do not appear to be sufficiently strong to minimise or eliminate late updates. The impact is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
I'm not sure how these dates are specified and recorded but these for these two installations, we tried to accept the ICPs but due to some setup issues we were unable to. I went in via the web and there was no acceptances available to us, the retailer made some changes and then I was able to accept them.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
No additional actions to be taken.		N/A
		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-Nov-18</p> <p>To: 16-Jul-19</p>	<p>Incorrect registry information</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls do not appear to be strong enough to minimise the incorrect registry updates, particularly certification and expiry dates, which drive the next inspection and certification events.</p> <p>Some incorrect dates can lead to installations not being inspected or certified, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
As previously stated as installations are made compliant and the Registry updated the errors in the registry will be updated.		On-going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Registry checking will start after we have completed most of the outstanding work.		On-going	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Nov-18 To: 16-Jul-19	Registry validation not conducted. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	A process is not in place to validate registry data. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
As stated previously we are concentrating on getting the installations certified, then move on to the required registry checking.		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
Re-instate Registry checking once all installations are fully certified.		On-going
		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-Nov-18</p> <p>To: 16-Jul-19</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> 22 installations without inspections within the window six installations with low burden. Monitoring not conducted for two installations certified at a lower category. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>There is no process in place to identify ICPs where certification is cancelled.</p> <p>The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
The spreadsheet that we are now running identifies the calibration expiry date when inspections are due and when the inspections become overdue.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
See above		Completed
		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: 21-Nov-16</p> <p>To: 16-Jul-19</p>	<p>Certification expired for 15 metering installations.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Whilst reporting is in place, the controls are recorded as weak with regard to ensuring recertification is conducted prior to expiry.</p> <p>The impact on settlement or participants unknown, but these are all higher category ICPs and if any are recording inaccurately the impact will be at least moderate, therefore the audit risk rating is recorded as medium. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are working to bring all installations up to specification, while this may not be happening as quickly as we would like, progress is being made.		On-Going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A technician has been appointed, to look after the requirements of the MEP role.		completed	

Certification as a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 7.6</p> <p>With: Clause 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7</p> <p>From: 14-Jan-19</p> <p>To: 16-Jul-19</p>	<p>Monitoring not conducted for two installations certified at a lower category.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>As there is no process in place for monitoring the controls are recorded as weak.</p> <p>The impact on settlement and participants could be minor if the threshold was exceeded and not identified; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Broadspectrum has previously made the decision not to certify at a lower category. These installations were certified for us by others, and we failed to identify that this had happened.</p> <p>We will start monitoring these two installations for max load</p>		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
Continue the policy of not downgrading installations		N/A
		Identified

Category 2 to 5 Inspections		
Non-compliance	Description	
<p>Audit Ref: 8.2</p> <p>With: Clause 46(1) of schedule 10.7</p> <p>From: 22-Jul-15</p> <p>To: 16-Aug-19</p>	<p>Inspections not conducted within the allowable window for four installations.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>There is no process in place to ensure inspections are conducted within the inspection window.</p> <p>The impact is unknown but there is a moderate risk that issues could be present and not identified, therefore the audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue		Completion date
We are now running a spreadsheet to Identify when inspections are due, as reminders from our database have stopped working after infrastructure changes within the company.		1/5/19
Preventative actions taken to ensure no further issues will occur		Completion date
A spreadsheet is now being used to monitor when inspections are due.		1/5/19
		Identified