

Compliance Plan for Counties MEP – 2019

Registry Notification of Metering Records			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jan-18 To: 30-Nov-18	10 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are in place to ensure the timeliness of updates, but Counties is often prevented from updating the registry due to late nomination or late updates from traders. 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
[COUP are reliant on other participants populating registry data or statuses]		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[Some of this is out of our direct control but reports are run daily and Retailers chased to completed their nominations]		N/A	

Design Reports for Metering Installations			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Jan-18 To: 30-Nov-18	Design Report not recorded for 6 metering installations. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as strong because processes are in place to ensure that correct design reports are used. 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
[These occurred where meters replaced but no change to the original design. Field staff reminded to complete the design report reference field on the installation report form]		Done	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[This is typically corrected at time of data entry is design report populated within the systems]		Ongoing	

Metering Installation Design & Accuracy	
Non-compliance	Description
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 01-Jan-18 To: 30-Nov-18	Design Report not recorded for 6 metering installations. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	<p>Controls are recorded as strong because processes are in place to ensure that correct design reports are used.</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
[These occurred where meters replaced but no change to the original design. Field staff reminded to complete the design report reference field on the installation report form]		Done	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[This is typically corrected at time of data entry is design report populated within the systems]		Ongoing	

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-18</p> <p>To: 30-Nov-18</p>	<p>Some records updated on 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: 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 there is room to improve and shorten the notification process for new connections.</p> <p>The late updates for new connections occurred after the trader had populated their records, therefore the impact on participants, customers or settlement is minor, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
[Some new staff in MEP administrative roles]		Done	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
[MEP administration team have been reminded of this requirement]	Done	

MEP Response to Switch Notification			
Non-compliance	Description		
Audit Ref: 6.1 With: Clause 1 (1) of Schedule 11.4 From: 01-Jan-18 To: 30-Nov-18	MN file not sent within 10 days for 12 ICPs. Potential impact: Low 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 Counties has good monitoring in place for this. There is a minor impact on other participants; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
[An automated process is in place to handle, but the systems have encountered miscellaneous file transfer glitches]			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[To be raised with IT administration for improvement]		29/03/19	

Provision of Registry Information			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Jan-18 To: 30-Nov-18	Some registry records incomplete or incorrect. 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	I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made. Certification of control devices is an example. Very few of the discrepancies have an impact on participants, customers or settlement. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
[Primarily miscellaneous manual data entry errors]		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[Ongoing improvements in data entry checking with system validation checks already evident in lower numbers of discrepancy's. Errors identified to be corrected]		29/03/19	

Cancellation of Certification			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Jan-18</p> <p>To: 30-Nov-18</p>	<p>Certification not cancelled on the registry for two metering installations where low burden is present.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Never</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The installations with low burden are all recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for Counties 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> <p>I have recorded the controls as moderate as there is room for improvement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
[Test House has already been issued jobs to correct add burden and recertify the ICPs in question]		29/03/19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[Raised with Test House, and standing instruction on implementing additional burdening secondary circuits on <500A CTs as necessary issued]		Completed	

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-Jan-18</p> <p>To: 30-Nov-18</p>	<p>Certification expired for:</p> <ul style="list-style-type: none"> - 1,201 previously interim certified category 1 ICPs - 530 category 1 ICPs - 3 category 2 ICPs <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>I have recorded the controls as moderate in this area because certification has been expired for a number of years for some ICPs and because some of the expired installations were fully certified at one point.</p> <p>The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>[On going endeavours to continue to drive down the Cat 1 uncertified balance remaining.</p> <p>Noting as Retailers and the Network are reluctant to disconnect customers, substandard electrical installations cannot be completed without customer action or cooperation with the MEP]</p>		[None]	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>[The two outstanding Cat 2 ICPs are issued to Test House, and COUP are liaising with the Retailers to achieve access to the metering installation, Registry status to be updated on the other]</p>		[29/03/19]	

Timekeeping Requirements			
Non-compliance	Description		
Audit Ref: 7.10 With: Clause 23 of schedule 10.7 From: 01-Jan-18 To: 15-Jan-19	15 timeclocks not checked. 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	I have recorded the controls as moderate in this area because progress has been made in removing the timeclocks and there is a plan in place to remove those remaining. It is unlikely that there will be significant time errors which will impact on participants, customers or settlement. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
[Multi-rate tariffs requiring timed register switching have been closed for many years on COUP network. The Network is liaising with all Retailers to withdraw them from customers. No customer is commercially disadvantaged regardless of potential drift of meter time]		01/04/19	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[Regardless each remaining meter is scheduled for AMI upgrade, however is subject to Test House resource constraints in the region]		TBA	

Interim Certification			
Non-compliance	Description		
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 30-Nov-19	1,201 ICPs with expired interim certification. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	I have recorded the controls as moderate in this area because certification has been expired for a number of years for these ICPs. The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
[See previous comments regards Cat 1 replacement program]		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[An on-going program of works in this area continues with best endeavours, however this issue will almost certainly remain outstanding at next audit - as some aspects outside our control as MEP]		unknown	

Electronic Interrogation of Metering Installations			
Non-compliance	Description		
Audit Ref: 10.5 With: Clause 8 of Schedule 10.6 From: 01-Jan-18 To: 15-Jan-19	Some installations not interrogated within the maximum interrogation cycle. Potential impact: High Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	I have recorded the controls as moderate because reporting is in place but there is room for improvement to ensure all AMI installations are successfully interrogated. The impact on settlement is considered moderate, because some traders will be required to estimate data. The impact on traders and customers is also moderate because some customers will be required to switch retailers if AMI data is not available. The audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
[We have noted, typically the meters not read within the interrogation cycle are cat 1 residential, irrigation, flood pumps, and holiday homes fully powered off prior to the meter preventing the successful remote read. NOT the TOU / HHR reconciled commercial metering to which perhaps the requirement was aimed] (actual impact with such scenario on reconciliation is logically low)			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
[We continue to educate customers not to isolate the electrical installation at the metering isolator] Additionally a 6 month project has been initiated already to reinforce the communications network in remote areas to ensure a back up communication path always exists]		30/07/19	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Jan-18 To: 15-Jan-19	10 examples of clock errors outside the allowable thresholds in the November 2018 report. 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 because clocks are synchronised during every successful interrogation. The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
[Clock errors outside the threshold often pertain to newly installed meters - not yet synced initially]		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
[Any meters with ongoing time clock issues will be replaced]		Ongoing
		Identified