

## Compliance plan for AMS MEP - 2017

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Feb-17 To: 11-Oct-17	Registry not always updated as soon as practicable by NGCM 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 the timeliness of registry updates. The impact on other participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
VAMS have introduced a new work order tool to achieve this. Most of the cancelled certifications are fault jobs (clause 10.43), which provides us some leeway when trying to comply with clause 10.6(2). We believe we generally meet this clause but as mentioned above, have taken further steps to improve the timeliness of registry updates.		Oct 2017
Preventative actions taken to ensure no further issues will occur		Completion date
A new work order system has been recently introduced to improve our timeliness to updating the registry as soon as practicable. This includes a new report called 'Bridged meter report' which is run weekly.		Nov 2017
		Identified

Payment of Costs to Losing MEP	
Non-compliance	Description
Audit Ref: 3.1 With: Clause 10.22 From: 01-Feb-17 To: 11-Oct-17	Payment not made to the losing MEP within 20 business days Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating

<b>Low</b>	AMCI dispute this non-compliance. I have relied on the Authority's advice that payment is required, therefore I have recorded that controls are not in place to ensure payment is made within 20 business days.  The impact on one other participant is minor; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The last email received from the losing MEP regarding this was the 17 October 2016. They do not appear to be pursuing this any further and VAMS believe there is no breach because the losing MEP are still claiming lease fees on the CT's, therefore, they cannot claim certification costs. We believe either the code needs to be clearer on the intent of this clause, or better education of participants is required to avoid misinterpretation.		Nov 2017	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We have only received one such request in 4 years, but if Vector receive any further claims, we will review each on a case by case basis, and if they meet the requirements of the code, we will pay the fees. Therefore, I believe our controls are strong. In this particular case, we do not believe the fees were justified as the losing MEP is still charging lease fees on their CT's. We discussed this with the Authority and they agreed with our interpretation of the code, however we believe the code could be rewritten to clarify the intent better.		Ongoing	

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-Dec-16</p> <p>To: 31-Aug-17</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		
<b>Low</b>	<p>Controls are in place to ensure the timeliness of updates, but AMS 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

<u>NGCM</u>  As stated by the auditor, we do have strong controls in place to ensure we update the Registry as soon as possible. We have introduced a new work order system since the last audit, which is reducing the time to return FSP information. Our average days to update the registry is continuing to reduce (now 8.6 days), however we are still hamstrung by late nominations which continue to keep our percentage compliant down.	Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<u>NGCM</u>  Continuing to send our weekly report to traders who have not nominated. All contracted ATHs and most retailers are in the new system, this will improve information returns and automatically reject incorrect information, speeding up the process and removing human errors. We are currently working to on-board the remaining retailer and expect to have this in place early next year.	March 2018	

Metering Installation Design & Accuracy			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7  From: 29-Aug-13 To: 18-Oct-17	Error and uncertainty calculations not conducted correctly for most Category 2 metering installations.  Design report not recorded for one installation  Potential impact: Medium  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	I have recorded the controls as moderate because there is room to improve the records provided by ATHs and their processes.  There could be a minor impact on metering installation accuracy; therefore, the audit risk rating is low		
Actions taken to resolve the issue		Completion date	Remedial action status
VAMS do not contract to Northpower and have not done so since before the previous audit.		December 2017	Investigating

<p>We have worked closely with Wells since last audit and the following email shows they have adjusted their process to comply with the code. The action will be to check this specific issue during service provider audits</p> <p><i>Latest correspondence from Wells on 28/09/2017</i></p> <p><i>The Hiokis have their calibration certified at 21-22 oC (recorded on the certificate), they have a specified operating temperature range of 0-40oC, and a temperature accuracy characteristic of within <math>\pm 0.03\%</math> f.s./°C, so there is confidence that they are relatively unaffected by ambient temperature, however I purchased a set of digital thermometers for our Cat-2 techs and have provision for the ambient temperature to be recorded in the workflow during the Prevailing Load Test. Regards, Leith Robertson</i></p> <p>As mentioned, Delta are currently disputing this issue, they are however, measuring temperature and humidity relating to their Hioki 3196, and displaying this on the commissioning sheets.</p>		<p><u>Auditor comment</u></p> <p>The relevant ATHs have not demonstrated compliance during their most recent audits, therefore this matter remains unresolved.</p> <p>Whilst there is no agreement in place between VAMS and Northpower, Northpower has certified some metering installations where VAMS is the MEP</p>
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Northpower not used by VAMS since February 2017. Issue to be specifically reviewed during field service audits to ensure the process is being followed.	December 2017	

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-Dec-16</p> <p>To: 31-Aug-17</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: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room for improvement.</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
VAMS believes we have strong controls in place (they are the same controls as per section 3.2, clause 2 of schedule 11.4) to		Nov 2017
		Identified

<p>ensure we update the Registry within the 10 days. We have introduced a new work order system since the last audit, which is reducing the time to return FSP information. Our average days to update the registry is continuing to reduce (now 8.6 days), however we are still hamstrung by late nominations which continue to keep our percentage compliant down. This is more prevalent in the C&amp;I space where our percentage compliance is down to 26%, primarily due to late nominations.</p> <p>AMCI continues to monitor paperwork delivery from our ATHs to ensure our ATHs meet their 5 BD contracted KPI which allows AMCI to attain better 10 BD delivery to the Registry. New contracts with the ATHs will be actioned early next year in which additional delivery KPIs will be set to assist and support this delivery requirement.</p>		<p><u>Auditor comment</u></p> <p>The control rating includes new connections and corrections for both NGCM and AMCI. There is some room for improvement before the controls can be recorded as strong across all parts of the business.</p>
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>Continuing to send our weekly report to traders who have not nominated. All contracted ATHs and most retailers are in the new system, this will improve information returns and automatically reject incorrect information, speeding up the process and removing human errors. We are currently working to on-board the remaining retailer and expect to have this in place early next year.</p> <p>AMCI has new contracts with the ATHs, these will be actioned early next year in which additional delivery KPIs will be set to assist and support this delivery requirement.</p> <p>The AMCI Operational team also pick up ATHs certification work orders early in our process to ensure we update our system more proactively.</p>	March 2018	

Responsibility for Metering at ICP	
Non-compliance	Description
<p>Audit Ref: 4.12</p> <p>With: Clause 11.18B(3)</p> <p>From: 01-Dec-16</p> <p>To: 31-Aug-17</p>	<p>Trader not advised to carry out final meter read for decommissioned ICPs.</p> <p>Potential impact: None</p> <p>Actual impact: None</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>	I have not identified any controls NGCM could put in place to achieve compliance with this clause.

Actions taken to resolve the issue	Completion date	Remedial action status
<p>This appears to contradict Clause 11.18(3) which states 'If an ICP is to be decommissioned, the trader who is responsible for the ICP must,</p> <p>a) Arrange for a final interrogation to take place before or on removal of the meter and,</p> <p>b) Advise the MEP responsible for the ICP that it is to be decommissioned.</p> <p>We raised this with the EA on 15 Feb 2017.</p> <p><u>AMCI</u></p> <p>Retailers advise AMCI of decommissioning through SRs received for actioning equipment removals.</p> <p>All final reads are taken onsite and where possible prior to meters being removed. Alternatively, meters are sent to VAMS Tech Support or our ATH test house for urgent bench downloads.</p> <p>Where meters cannot be downloaded due to faults we will request approval from the Retailer to estimate data.</p>	Ongoing	Investigating
		<p><u>Auditor comment</u></p> <p>The contradiction in the Code is taken into account with regard to this non-compliance when the final next audit date recommendation is made.</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
As per above	N/A	

Accurate and Complete Records		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1) of Schedule 10.6</p> <p>From: 01-Feb-17</p> <p>To: 11-Oct-17</p>	<p>Metering records not populated on registry for one ICP</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	
<b>Low</b>	<p>I have recorded the controls as strong because AMCI processes would not normally allow for this to occur.</p> <p>It is likely that this installation is no longer active; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

AMCI's ATH removed metering on this ICP without AMCI permission. The metering had been deenergized and the customer electrician was not using it and wanted it removed – AMCI immediately advised the Retailer and the ICP has subsequently been decommissioned as at 20/11/2017	20 Nov 2017	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
AMCI has formally advised our ATHs not to remove any metering without a formal request from AMCI no matter what the Customer requests and specifically unless the ICP has been deemed decommissioned.	Nov 2017	

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-Dec-16</p> <p>To: 31-Aug-17</p>	<p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</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	
<b>Medium</b>	<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 moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Remedial action status
		<b>Completion date</b>

<p>We are addressing the discrepancies on the table and expect to have them cleared in a couple of months. We have included these in our reconciliation process to ensure we capture and correct as many discrepancies as possible going forward.</p> <ul style="list-style-type: none"> <li>• Discrepancies such as 'ICPs have CN only (residential)' This is where the Retailer has used the wrong ANSIC code, these are actually industrial or irrigation sites.</li> <li>• 'Generation ICP with no injection register' This is because Distributor setting load type to 'B' but Retailer has never raised a job for imp/exp metering.</li> <li>• Profile requiring a certified control device and flag is "N" The majority of these are where the Retailer has set incorrect profile on Registry.</li> </ul> <p>AMCI forwarded the list of 41 ICPs with incorrect injection information – analysis has found that the Registry is potentially incorrectly set up – AMCI is following up on this with our Data Services team and Retailer</p> <p>These are primarily legacy sites.</p>	Feb 2017	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>We have included these in our reconciliation process to ensure we capture and correct as many discrepancies as possible going forward. We now produce a monthly reconciliation report like the one the auditor used in this report.</p> <p>AMCI - All new sites are correctly setup in Servicemax and information is sent to the Registry with the correct Injection information</p>	Ongoing	

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-Dec-16</p> <p>To: 31-Aug-17</p>	<p>Discrepancies not resolved within 5 business days.</p> <p>Potential impact: Medium</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



<b>Medium</b>	<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 moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We do strive to resolve all discrepancies within the 5 day window however it has been very hard to achieve full compliance. We continue to look for ways to improve the way we report and subsequently resolve these. Most of these are historical (however not all) so as we introduce new systems to ensure we update the registry with the correct information from the get go, these numbers will reduce.		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We have introduced a new work order system with validation to ensure paperwork from FSPs is correct prior to updating the registry, this will eliminate incorrect data being updated to the Registry and will speed up paperwork returns.		Oct 2017	

Cancellation of Certification	
Non-compliance	Description
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Dec-16</p> <p>To: 31-Aug-17</p>	<p>Certification cancelled and registry not updated for:</p> <ul style="list-style-type: none"> <li>• 2 Category 3 installations with inspections completed early</li> <li>• 2 Category 4 installations with inspections completed late</li> <li>• 3 Category 5 installations with inspections completed early</li> <li>• 4 three phase installations with only one phase metered</li> <li>• 68 Category 2 installations with overdue inspections</li> <li>• 94 installations where meters were bridged</li> </ul> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
<b>Medium</b>	<p>I have recorded the controls as moderate in this area. Many of the examples found were present during previous audits and there is room for improvement.</p> <p>The issues found can all potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>We have a thorough inspections policy and most of our metering installations are inspected within the correct windows for their category. This is the first time we have been given non-compliances for early inspections, and this only occurred on a very small number of higher category sites.</p> <p>We do not inspect on Cat 2 sites as the majority are on a 10 year recertification cycle, however there still some on a 15 year cycle which were not picked up, a new report has been created to identify these at least 6 months ahead of time, they will then be recertified within the certification date.</p> <p>We have worked through the 94 installations where the metering has been bridged and have found that for most ICPs in the report, VAMS weren't aware that site was bridged until after the retailer sent us a job to un-bridge and re-certify site. Most sites that the ATH unbridged and re-certified, were just data entry errors made when the job was closed off. We have corrected the data for them in our system and Registry is now showing correct re-certification details. Our process is to return next day to recertify whenever a bridge takes place, this is usually when a remote disconnection has taken place and the meter has since lost communications, so a remote reconnection cannot take place.</p> <p><u>AMCI</u></p> <p>AMCI has cancelled certification on all highlighted sites;</p> <p>AMCI reviewed 2 ICPs listed above and found the EIPC inspection had been completed in the window period – evidence to be sent to EA Auditor</p> <p>Corrective recertification has been actioned by AMCI on all highlighted ICPs</p>	Nov 2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A new report has been created for Cat 2 ICPs with a 15 year certification expiry, to identify when these reach 10 years, at which time we will recertify them.</p> <p>AMCI has included checks in our quality &amp; assurance procedures to confirm if any EIPC inspections are done outside the allowed window period</p> <p>AMCI is also including in our EIPC inspection work orders the complete allowed window period that the inspection can be done</p>	Nov 2017	

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: 12-Aug-14</p> <p>To: 31-Aug-17</p>	<p>Certification expired for 49,750 NGCM ICPs</p> <p>Certification expired for 8 AMCI ICPs</p> <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	
<b>Medium</b>	<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
<p><u>NGCM</u></p> <p>We have been reporting on progress of the 49,331 previously interim certified installations with the EA separately. We are continuing to actively pursue these with Retailers, and recertify the site when made available.</p> <p>ICP 0033300862PC31A is currently being upgraded and moved outside the transformer, which will make future certification easier.</p> <p><u>AMCI</u></p> <p>Non-compliance is monitored weekly – all non-compliant sites currently have actions against them to resolve</p> <p>Customers not allowing safe access to our installations are our biggest issues or installations requiring upgrade – AMCI is working with our customers to progress these sites</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above		Ongoing
		Investigating

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Jan-01 To: 30-Jun-17	49,331 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	
<b>Medium</b>	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
We continue to manage these sites with retailers and recertify as soon as practicable. Reporting to, and consultation with the EA regarding any blockers to compliance will be maintained until completed.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Because this clause has a date that is already past, we will continue to breach it until every last 'formally interim certified' ICP is recertified. As above, we are actively managing this with Retailers and the EA.		Ongoing
Remedial action status		
Investigating		

Category 2 to 5 Inspections	
Non-compliance	Description
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 01-Dec-16 To: 31-Aug-17	Inspections not conducted within the required window for: <ul style="list-style-type: none"> <li>19 NGCM installations where inspections were not conducted</li> <li>2 Category 3 installations with inspections completed early</li> <li>2 Category 4 installations with inspections completed late</li> <li>3 Category 5 installations with inspections completed early</li> </ul> Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4

Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>I have recorded the controls as moderate in this area for NGCM because reporting has been recently developed to identify inspection requirements. AMCI's inspection controls are rated as moderate to strong because there is a regime in place and only a small number were outside the window.</p> <p>The issues found can potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have a thorough inspections policy and most of our metering installations are inspected within the correct windows for their category. This is the first time we have been given non-compliances for early inspections, and this only occurred on a very small number of higher category sites.</p> <p>We do not inspect on Cat 2 sites as the majority are on a 10 year recertification cycle, however there still some on a 15 year cycle which were not picked up, a new report has been created to identify these at least 6 months ahead of time, they will then be recertified within the certification date.</p> <p><u>AMCI</u></p> <p>AMCI has cancelled certification on all highlighted sites;</p> <p>AMCI reviewed 2 ICPs listed above and found the EIPC inspection had been completed in the window period – evidence to be sent to EA Auditor</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A new report has been created for Cat 2 ICPs with a 15 year certification expiry, to identify when these reach 10 years, at which time we will recertify them.</p> <p>AMCI has included checks in our quality &amp; assurance procedures to confirm if any EIPC inspections are done outside the allowed window period</p> <p>AMCI is also including in our EIPC inspection work orders the complete allowed window period that the inspection can be done</p>		Oct 2017	

Investigation of Faulty Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 9.1</p> <p>With: Clause 10.43(4) and (5)</p> <p>From: 01-Dec-16</p> <p>To: 31-Aug-17</p>	<p>Faulty meters not reported to traders within 20 business days.</p> <p>Potential impact: Medium</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	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room to improve the timeliness of notifications.</p> <p>The impact on settlement is recorded as minor because retailers have processes to estimate the data for the period meters are bridged.</p>	
Actions taken to resolve the issue		Completion date
<p>VAMS attends a failed remote reconnect and bridges the ICP-</p> <p>As a result of a failed remote reconnect VAMS attends site. The on-site process is to call VAMS Data Services team to resolve comms and remotely re-connect. If the tech cannot establish comms and remotely re-connect he may be asked to bridge. VAMS will return the following day to un-bridge and recertify. The issue at site is a comms issue not a faulty meter. Once un-bridged, the meter will correctly record consumption.</p> <p>Action to ensure that if bridged metering does not get re-certified next day, that installation is immediately cancelled. A new report has been created which will identify these on a weekly basis.</p> <p><u>AMCI</u></p> <p>Full timeline provided to EA Auditor regarding incident and actions taken.</p>		Feb 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Further information requested – currently being provided		Ongoing

Testing of Faulty Metering Installations		
Non-compliance	Description	
Audit Ref: 9.2 With: Clause 10.44 From: 01-Dec-16 To: 31-Aug-17	Statement of situation not arranged Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as moderate in this area because there is room to improve the timeliness of notifications. The impact on settlement is recorded as minor because retailers have processes to estimate the data for the period meters are bridged.	
Actions taken to resolve the issue		Completion date
VAMS already has a strong process in place where a revenue assurance (RA) document is produced when requested. The RA is the equivalent to a statement of situation. We have renamed the document to make it clear it is a statement of situation.		Oct 2017
Preventative actions taken to ensure no further issues will occur		Completion date
Revenue assurance document renamed to Statement of situation to clarify what its purpose is. Document has been in use since part 10 introduction.		Oct 2017
		Identified

Statement of Situation	
Non-compliance	Description
Audit Ref: 9.3 With: Clause 10.46(2) From: 01-Dec-16 To: 31-Aug-17	Statements of situation not provided to the market administrator within 3 business days. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	Rationale for audit risk rating

<b>Low</b>	<p>The controls are recorded as moderate because 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	Remedial action status
AMCI will adjust their process to ensure on Cat 3 and above, that any statements of situation are sent to the Market administrator as well as the affected participant. This did not happen for the above two ICPs, an overall look at the process is therefore required.		Dec 2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Change the process to ensure the statement of situation is sent to the Market administrator at the same time it is sent to the affected participant.		Dec 2017	

Electronic Interrogation of Metering Installations			
Non-compliance	Description		
<p>Audit Ref: 10.5</p> <p>With: Clause 8(2) of schedule 10.6</p> <p>From: 01-Dec-16</p> <p>To: 30-Sep-17</p>	<p>1,930 metering installations not read within the maximum interrogation cycle.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room to tighten the timeframes for resolution of these matters. 589 examples are over 365 days for Active ICPs. I note that retailers have an important role to play in the resolution of many of the issues.</p> <p>The impact on settlement is recorded minor because of the low number involved; therefore the audit risk rating for most retailers is low. For AMI only retailers, the impact would be major and the audit risk rating high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status



<p>The above list is being actively managed, half of them are inactive sites that may well be communicating, but are not powered, we will know when they are re-powered as they will begin communicating again. As stated, Retailers need to play their part in resolving most of these for VAMS to be successful.</p> <p>Actions: We have communicated many of these to retailers and have had no reply, without their support we cannot determine if there is a fault or if the power is off. We also need a service request to attend site to repair.</p> <p>We accept there are some ICPs that have been inactive for a long period and we are pushing hard to get the AMI flag correctly updated on these.</p>	Ongoing	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
<p>Note: The Maximum interrogation cycle is not what we use to define the time for investigating a communication fault. This time is generally 10 days consecutive no reads from a meter. Some retailers have slightly different wants (shorter) so we try to cater to that. There are several steps when identifying a no comms fault so we are reviewing our process to identify real faults and repair them sooner. The current process involves:</p> <ul style="list-style-type: none"> <li>• the Data services team identifying the fault,</li> <li>• validating the fault,</li> <li>• sending to the retailer</li> <li>• Retailer validates the fault,</li> <li>• Retailer may contact the customer,</li> <li>• Retailer sends out a letter to say that someone will be coming to site,</li> <li>• Service request raised with Retailer Services team,</li> <li>• Raised to FSP to visit site</li> </ul> <p>Tech on site to resolve fault.</p>	Ongoing	