

Compliance Plan for WEL Networks MEP – October 2022

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Dec-21 To: 27-Jul-22	38 registry updates later than 15 business days. Potential impact: Low Actual impact: Low Audit history: Twice 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. 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
All but one instance was outside WEL control using the correct effective date when processing prioritised accurate Registry records and participant/customer impact over file submission timeframe compliance.	21/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
WEL will continue with our weekly Audit Compliance checks to investigate reasons (identifying any potential systematic issues), ensure completion and ensure impact is minimal.	27/10/2022	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Dec-21 To: 27-Jul-22	Some records updated to the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Twice 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 is room for improvement. The updates relate to corrections which have a minor impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The eight late updates correcting data relate to the initial metering event after an MEP nomination rather than re certifications of sites. 0000022125WE134 - Registry updated 31/10/22.	27/10/2022 31/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
WEL will continue with our weekly Audit Compliance checks to investigate reasons (identifying any potential systematic issues), ensure completion and ensure impact is minimal. 0000022125WE134 - See 6.4 below	27/10/2022	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4 From: 01-Feb-21 To: 20-Oct-22	Some inaccurate certification records. 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 and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Changes will be undertaken to the certification recording to ensure correct pulse count recording time and load control expiry dates are recorded.	31/12/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We await EA thoughts on issues raised on sites where existing certified metering is on sites and Registry records are simply updated to reflected current MEP.	Dependent on EA response	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 16-Mar-22 To: 31-Mar-22	One late MN file. 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 as the WEL process ensures that nominations are normally accepted within 10 business days. The impact is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The single instance was driven by time to determine cause of the initial file's rejection. No further action required on this instance.	27/10/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Since this occurrence we have instigated tighter file error notification to ensure any issues are resolved within timeframes. In addition we have a 2 weekly Registry discrepancy check which includes a check that would identify this situation if unresolved.	27/10/2022	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 26-Nov-20 To: 22-Jul-22</p>	<p>Certification not cancelled within 10 business days for ICP 0000022125WE134 after missed inspection. Potential impact: Medium Actual impact: Unknown Audit history: Twice Controls: Moderate 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. 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
Registry updated 31/10/2022	31/10/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Initial cause of this occurrence was a gap in hand over from a retiring staff member. Since then implemented we have tighter controls on higher category metering certification and inspections.	27/10/2022	

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 26-Nov-20 To: 22-Jul-22	Certification cancelled for ICP 0000022125WE134. Potential impact: Medium Actual impact: Unknown Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate 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	Remedial action status
See 6.4 above.	27/10/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
See 6.4 above.	27/10/2022	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 01-Feb-21 To: 06-Nov-21	Some certification tests not recorded by ATHs. Potential impact: Medium 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 as ATH processes ensure that testing requirements are met in most scenarios 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
See 5.1 above		31/12/2022
Preventative actions taken to ensure no further issues will occur		Completion date
See 5.1 above		Dependent on EA response.
Remedial action status		
Identified		

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 06-Jul-22 To: 30-Jul-22	Three examples of time errors outside the allowable thresholds. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong because meter time is synchronised during every successful interrogation. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
All 3 instances had associated power up/power down events which were advised to Trader at time.	27/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Any time synchronisation all the events relating to the time sync (old time, new time, drift and surrounding events) are sent to the trader.	27/10/2022	