

Compliance Plan for Intellihub Ltd ATH – 2022

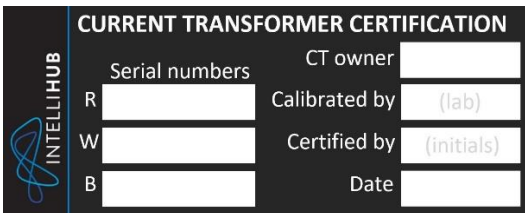
Provision of Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 10.6 of Part 10</p> <p>From: 01-Feb-21</p> <p>To: 07-Sep-22</p>	<p>Each services access interface not recorded correctly in five of a sample of 63 metering installation certification reports.</p> <p>Metering installation type recorded incorrectly in five of a sample of 63 metering installation certification reports.</p> <p>Burden range not recorded in CT certification reports for six a sample of 14 metering installations.</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>I have recorded the controls as strong as the processes have been updated to correctly record each services access interface, installation type and burden range.</p> <p>There is no impact on other participants or accuracy of metering installations; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The current versions of Metering Installation Certification Reports now correctly record these fields.	20/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action required as these fields are now correctly recorded.	20/9/2022	

Metering Installation Type			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 8(2) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 22-Jul-22</p>	<p>Metering installation type recorded incorrectly for five of a sample of 63 metering installations.</p> <p>Each services access interface not recorded correctly for five of a sample of 63 metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>I have recorded the controls as strong as the processes have been updated to correctly record each services access interface and installation type.</p> <p>There is no impact because the MEP normally determines the location of the services access interface and metering installation type; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The current versions of Metering Installation Certification Reports now correctly record these fields.		20/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required as these fields are now correctly recorded.		20/9/2022	

Services Access Interface			
Non-compliance	Description		
Audit Ref: 3.5 With: Clause 10 of Schedule 10.4 From: 01-Feb-21 To: 22-Jul-22	Each services access interface not recorded correctly for five of a sample of 63 metering installations. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong as the processes have been updated to correctly record each services access interface. There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The current versions of Metering Installation Certification Reports now correctly record these fields.		20/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
No further action required as these fields are now correctly recorded.		20/9/2022	

Advise MEP of Records, Certificates or Reports for A Metering Installation		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 14 Of Schedule 10.4 From: 01-Aug-21 To: 31-Aug-22	Certification records provided to the MEP late for 44% of metering installations certified. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak as they do not ensure records are provided within five business days for a high number of certifications completed. The impact on MEPs is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
IntelliHub is actively working towards resolving this issue by reviewing resourcing levels. There is also an increased focus on the implementation of a field app.	Unknown at this stage	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
IntelliHub is actively working on resolving this issue. A new field app is in development; the exact implementation date however is yet to be confirmed.	Unknown at this stage	

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 36(3) & (4) of Schedule 10.7 From: 01-Feb-21 To: 12-Aug-21	Maximum interrogation cycle incorrectly recorded for each services access interface in one metering installation. Potential impact: None Actual impact: None 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 as the processes have been updated to correctly record the maximum interrogation cycle correctly for each services access interface. There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The current versions of Metering Installation Certification Reports now correctly record these fields.	20/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action is required, as these fields are now correctly recorded.	20/9/2022	

Metering Component Stickers		
Non-compliance	Description	
Audit Ref: 4.13 With: Clause 8(1) and 8(4) of Schedule 10.8 From: 01-Feb-21 To: 07-Sep-22	Metering component certification stickers not applied to CTs certified in the field by IntelliHUB. Potential impact: None Actual impact: None 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 the majority of metering components have had certification stickers applied. There is no impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
A new label current transformer certification sticker has been designed and is being printed. Please refer to the example shown below.	16/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Please refer the example sticker attached. Technicians' instructions and procedure documents are to be reviewed and updated, as appropriate. 	1/12/2022	

Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1)(ii)(B) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 07-Sep-22</p>	<p>Four cases where minimum load requirement was not met for Category 1 raw meter data tests.</p> <p>Four cases where the ATH did not record test results when conducting Category 1 raw meter data tests.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>I have recorded the controls as strong because they mitigate risk to an acceptable level.</p> <p>The impact is negligible for the ICPs certified with less than 5% load. There is no impact from not doing a prevailing load test, because other tests confirm compliance of the installations.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Intellihub technicians have been informed of these requirements.	20/9/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Intellihub agrees to review and update its processes as appropriate, and also to provide a reminder communication regarding the minimum load requirement to all field staff.</p> <p>Intellihub will ensure that technicians record test results and provide these to the ATH. To verify the effectiveness a check will be made of commissioning reports to ensure that test results are included.</p>	1/2/2023	

Measuring Transformers used in a Certified Metering Installation		
Non-compliance	Description	
<p>Audit Ref: 5.37</p> <p>With: Clause 28(4) Of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 08-Aug-22</p>	<p>Two metering installations certified with CTs burden lower than the lowest burden test point specified in the standard without confirmation from the CT manufacturer.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>I have recorded the controls as strong because the IntelliHUB process ensures improved accuracy of the metering installations.</p> <p>There is no impact as the accuracy of the metering installations is improved by this non-compliance.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Intellihub disagrees with the Code requirement, and therefore accepts this non-compliance.</p> <p>Intellihub does not wish to increase the overall metering installation error by adding burden to the CT circuits.</p> <p>Intellihub agrees with the auditor's recommendation, that the Authority reviews the Code to allow the ATH to determine through testing whether burden should be added.</p>	20/9/2022	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Intellihub intends to continue with its current practice.</p> <p>Intellihub plans to enter into further discussion with the Authority on this matter.</p>	1/12/2022	

Burden & Compensation			
Non-compliance	Description		
Audit Ref: 5.40 With: Clause 31 of Schedule 10.7 From: 01-Feb-21 To: 08-Aug-22	Two metering installations certified with CTs burden lower than the lowest burden test point specified in the standard without confirmation from the CT manufacturer. Potential impact: Low Actual impact: None 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 the IntelliHUB process ensures improved accuracy of the metering installations. There is no impact as the accuracy of the metering installations is improved by this non-compliance.		
Actions taken to resolve the issue		Completion date	Remedial action status
Intellihub disagrees with the Code requirement, and therefore accepts this non-compliance. Intellihub does not wish to increase the overall metering installation error by adding burden to the CT circuits. Intellihub agrees with the auditor's recommendation, that the Authority reviews the Code to allow the ATH to determine through testing whether burden should be added.		20/9/2022	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Intellihub intends to continue with its current practice. Intellihub plans to enter into further discussion with the Authority on this matter.		1/12/2022	

Measuring Transformer Certification		
Non-compliance	Description	
Audit Ref: 5.67 With: Clause 3 of Schedule 10.8 From: 01-Feb-21 To: 30-May-22	Burden range not recorded in CT certification reports for six of a sample of 14 metering installations. Potential impact: Low Actual impact: None 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 as the processes have been updated to correctly record burden range. There is no impact because the in-service burden was within the burden range in all six examples; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The current versions of Metering Installation Certification Reports now correctly record these fields.	20/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action required as these fields are now correctly recorded.	20/9/2022	

Measuring Transformers in service burden range		
Non-compliance	Description	
Audit Ref: 5.68 With: Clause 2(1)(E) Of Schedule 10.8 From: 01-Feb-21 To: 30-May-22	Burden range not recorded in CT certification reports for six of a sample of 14 metering installations. Potential impact: Low Actual impact: None 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 as the processes have been updated to correctly record burden range. There is no impact because the in-service burden was within the burden range in all six examples; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The current versions of Metering Installation Certification Reports now correctly record these fields.	20/9/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
No further action required as these fields are now correctly recorded.	20/9/2022	