

Compliance plan for Wells 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: 11-Apr-22</p>	<p>18 of 20 Category 2 certification reports had the selected component certification method recorded instead of the comparative method. Many of these had measuring transformers recorded as certified but calibration tests were not conducted.</p> <p>The 18 installations above have CT certification stickers even though the CTs are not certified. These stickers will need to be removed.</p> <p>It's likely a further 306 selected component certifications are actually comparative.</p> <p>Four Category 2 certification reports had the incorrect burden range recorded or did not have the burden range recorded.</p> <p>Seven Category 2 certification reports had the installation type recorded as NHH, but they were actually HHR.</p> <p>The "SET DEFAULT ANSWERS" section of certification reports is misleading.</p> <p>Potential impact: Low</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	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The MEP has correctly recorded the certification information in the registry therefore the impact is recorded as low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>Records for the 18 installations have been corrected and the MEPs advised by email.</p> <p>Revisits to correct certification stickers where required are being requested.</p> <p>Further reviews of job data will be undertaken to check if there are in fact more instances of incorrect Certification Method.</p> <p>Incorrect Burden Ranges have been corrected and the MEPs advised by email. Note that some installation's jobs did not have provision for the range to be recorded because the jobs were created prior to the 1st Feb 2021 code change being catered for in our workflows.</p> <p>Records for the installations with incorrect installation type will be corrected and the MEPs advised by email.</p> <p>It is apparently not straightforward to omit the "Set Default Answers" task from the certification report, but a warning label can be added to all workflows to highlight that the default answers do not form part of the certification report.</p>	<p>Completed</p> <p>30-6-2022</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>31-5-2022</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.</p> <p>-An initial Cat-2 Teams Training session has been held this week.</p> <p>-Cat-2 Photochecker Training and Check-points are being reviewed.</p> <p>-Cat-2 Photochecker actions document has been amended to include additional Check-points.</p> <p>-Additional new Cat-2 Datachecking being put in place.</p> <p>-Options for automated Datachecking being investigated</p>	<p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>30-6-2022</p>	

Metering Installation Type			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7 From: 01-Feb-21 To: 11-Apr-22	Seven Category 2 certification reports record the installation type as NHH instead of HHR Potential impact: Low Actual impact: None 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 they reduce errors to an acceptable level. There is no impact because the MEP normally determines the installation type; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Records for the installations with incorrect installation type will be corrected and the MEPs advised by email.		31-5-2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit. -An initial Cat-2 Teams Training session has been held this week. -Cat-2 Photochecker Training and Check-points are being reviewed. -Cat-2 Photochecker actions document has been amended to include additional Check-points. -Additional new Cat-2 Datachecking being put in place. -Options for automated Datachecking being investigated		31-5-2022 Completed 31-5-2022 Completed 31-5-2022 30-6-2022	

Certification at a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 3.10</p> <p>With: Clause 6(4) Of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 15-Apr-22</p>	<p>All information regarding lower category certification not included in the certification reports for four metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</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 because there is room for improvement.</p> <p>If the MEP does not monitor load each month certification will be cancelled; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Unclear what, if any, actions can resolve the current situation since it is now historic. If we cannot change the failure to obtain all information before certification, and since the MEP has acknowledged the certification it seems that anything done now would be redundant.</p>		-
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Processes for obtaining clarification from MEPs are being developed, but they will introduce a new Turn-Down Reason in the workflows to request information from the MEP and await the required lower category certification instruction confirmation and historic usage data. This is necessary because unless the instruction is in the original job note, it will not be known until the tech arrives at site that certification at a lower category is going to be required.</p>		31-5-2022
Remedial action status		
Identified		

ATH must not Certify Metering Installations under certain circumstances		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 8(1) Of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 17-Apr-22</p>	<p>At least 68 category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>Two ICPs have an error greater than the combined classes of the components, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>At the time of the audit the controls were weak because they were insufficient to identify examples of non-compliant metering installations. Following the audit, the document called "Photo Checking Actions – Cat-1 & Cat-2" was updated to include checks of low burden and errors outside the combined class error of the components. I have therefore recorded the controls as moderate, and their effectiveness will be checked during the next audit.</p> <p>A presentation by the Electricity Authority in April 2019 indicated the total cost to a consumer over the 10-year certification where CTs were under burdened was between \$3,200 and \$9,200. This assumption was based on over recording of 1.0%, but more recent information suggests over recording of 0.5% is a more reasonable assumption. Therefore, the total cost to consumers for the 68 ICPs identified could be between \$108,800 and \$312,800, or \$10,880 to \$31,280 per annum. There is also an impact on five MEPs because certification is cancelled for these installations, and this can have an impact their compliance and potentially their audit frequency.</p> <p>I have therefore concluded the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Installations with low burden have been identified, the MEPs advised by email.</p> <p>Revisits for re-testing and burden resistor installation if required are now being planned.</p>	<p>Completed</p> <p>31-7-2022</p>	Identified
<p>Installations with error greater than class sum have been identified, the MEPs advised by email.</p> <p>Revisits for re-testing are now being planned.</p>	<p>Completed</p> <p>31-7-2022</p>	

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.</p> <p>-An initial Cat-2 Teams Training session has been held this week.</p> <p>-Cat-2 Photochecker Training and Check-points are being reviewed.</p> <p>-Cat-2 Photochecker actions document has been amended to include additional Check-points.</p> <p>-Additional new Cat-2 Datachecking being put in place.</p> <p>-Options for automated Datachecking being investigated</p> <p>Validation is in the workflows to prevent a job from progressing when error is greater than class sum, however these two jobs were created before that validation was added last year.</p>	<p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>30-6-2022</p> <p>Completed</p>	

Determining Metering Installation Category at a Lower Category Using Current Transformer Rating		
Non-compliance	Description	
<p>Audit Ref: 5.7</p> <p>With: Clause 6(2)(b) & (d) of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 17-Apr-22</p>	<p>Wells does not have sufficient information to determine certification as a lower category is appropriate. Including for ICP 0000164833CK11A which was a new connection, where historic data from a similar installation may be required to confirm the load or consumption will not exceed the thresholds.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>At the time of the audit the controls were weak because they were insufficient to identify examples of non-compliant metering installations. Following the audit, the document called "Photo Checking Actions – Cat-1 & Cat-2" was updated to include checks of certification as a lower category. I have therefore recorded the controls as moderate, and their effectiveness will be checked during the next audit</p> <p>The impact could be that the CTs become overloaded if the demand is not monitored or the consumption could exceed the required thresholds, meaning more accurate metering and HHR settlement is required.</p>	
Actions taken to resolve the issue		Completion date
<p>Unclear what, if any, actions can resolve the current situation since it is now historic. Ie we cannot change the failure to obtain all information before certification, and since the MEP has acknowledged the certification it seems that anything done now would be redundant.</p>		-
Preventative actions taken to ensure no further issues will occur		Completion date

<p>Processes for obtaining clarification from MEPs are being developed, but they will introduce a new Turn-Down Reason in the workflows to request information from the MEP and await the required lower category certification instruction confirmation and historic usage data. This is necessary because unless the instruction is in the original job note, it will not be known until the tech arrives at site that certification at a lower category is going to be required.</p>	31-5-2022	
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Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1) of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 17-Apr-22</p>	<p>Minimum load of 5% was not applied for ICP 0000511359WE36F.</p> <p>At least 10 Category 1 metering installations recertified without a prevailing load test.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 ICP certified with less than 5% load. There is no impact of not doing a prevailing load test, because raw meter data output tests are conducted.</p>	
Actions taken to resolve the issue		Completion date
<p>The installation will be revisited and the Meter Function test repeated at a load greater than 5%</p> <p>Acknowledged but disputed due to industry acknowledged code error</p>		<p>30-6-2022</p> <p>-</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>-Additional Training is being provided via weekly Metering Reminders with some having already been given since the audit.</p> <p>-Photochecker Training and Check-points are being reviewed.</p> <p>-Options for automated Datachecking being investigated</p> <p>As discussed during the audit, the EA have been contacted regarding this apparent error. MEPs have been contacted and all agree that there is an error and that they do not require Wells ATH to perform a Prevailing Load Test in these circumstances</p>		<p>31-5-2022</p> <p>31-5-2022</p> <p>30-6-2022</p> <p>-</p>
Remedial action status		
Identified		

Test Results		
Non-compliance	Description	
<p>Audit Ref: 5.16</p> <p>With: Clause 10(1) & (2) of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 17-Apr-22</p>	<p>At least 68 category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>Two ICPs have an error greater than the combined classes of the components, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: High</p> <p>Actual impact: High</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	
High	<p>At the time of the audit the controls were weak because they were insufficient to identify examples of non-compliant metering installations. Following the audit, the document called "Photo Checking Actions – Cat-1 & Cat-2" was updated to include checks of low burden and errors outside the combined class error of the components. I have therefore recorded the controls as moderate, and their effectiveness will be checked during the next audit.</p> <p>A presentation by the Electricity Authority in April 2019 indicated the total cost to a consumer over the 10-year certification where CTs were under burdened was between \$3,200 and \$9,200. This assumption was based on over recording of 1.0%, but more recent information suggests over recording of 0.5% is a more reasonable assumption. Therefore, the total cost to consumers for the 68 ICPs identified could be between \$88,000 and \$253,000. I have therefore concluded the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Installations with low burden have been identified, the MEPS advised by email.</p> <p>Revisits for re-testing and burden resistor installation if required are now being planned.</p>	<p>Completed</p> <p>31-7-2022</p>	Identified
<p>Installations with error greater than class sum have been identified, the MEPS advised by email.</p> <p>Revisits for re-testing are now being planned.</p>	<p>Completed</p> <p>31-7-2022</p>	

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.</p> <p>-An initial Cat-2 Teams Training session has been held this week.</p> <p>-Cat-2 Photochecker Training and Check-points are being reviewed.</p> <p>-Cat-2 Photochecker actions document has been amended to include additional Check-points.</p> <p>-Additional new Cat-2 Datachecking being put in place.</p> <p>-Options for automated Datachecking being investigated</p> <p>Validation is in the workflows to prevent a job from progressing when error is greater than class sum, however these two jobs were created before that validation was added last year.</p>	<p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>30-6-2022</p> <p>Completed</p>	

Selected Component - Circumstances where method may be used		
Non-compliance	Description	
<p>Audit Ref: 5.18</p> <p>With: Clause 11(4) of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 17-Apr-22</p>	<p>Calibration not conducted when CTs certified for up to 324 Category 2 metering installations certified using the selected component method.</p> <p>ICPs 0007196846RNC92 and 0007190809RN429 had meters recertified without calibration being conducted.</p> <p>Meters certified without calibration for at least 10 Category 1 installations recertified with existing meters.</p> <p>Potential impact: Low</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	
Low	<p>The controls are recorded as moderate because certification tests are completed in most cases.</p> <p>The impact is likely to be low as certification tests had been carried out on the meters during previous certifications; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<ul style="list-style-type: none"> - Records for the listed installations have been corrected and the MEPs advised by email. - Further investigations into what additional installations might be affected will be conducted and records for the additional installations will be corrected and the MEPs advised by email. - The installations will be revisited to have superseded sticker(s) removed. <p>Acknowledged but disputed due to industry acknowledged code error</p>	<p>Completed</p> <p>30-6-2022</p> <p>31-7-2022</p> <p>-</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.</p> <p>-An initial Cat-2 Teams Training session has been held this week.</p> <p>-Cat-2 Photochecker Training and Check-points are being reviewed.</p> <p>-Cat-2 Photochecker actions document has been amended to include additional Check-points.</p> <p>-Additional new Cat-2 Datachecking being put in place.</p> <p>-Options for automated Datachecking being investigated</p> <p>As discussed during the audit, the EA have been contacted regarding this apparent error. MEPs have been contacted and all agree that there is an error and that they do not require Wells ATH to perform a Prevailing Load Test in these circumstances</p>	<p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>30-6-2022</p> <p>-</p>	
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Compensation Factors			
Non-compliance	Description		
<p>Audit Ref: 5.31</p> <p>With: 24(1)(b) of Schedule 10.7</p> <p>From: 16-Jun-21</p> <p>To: 25-Jan-22</p>	<p>Incorrect compensation factor recorded for ICP 0000616050WPE6E.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>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.</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
Unclear what, if any, actions can resolve the current situation since it is now historic and the MEP data has already been corrected.		-	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
It is apparently not straightforward to omit the "Set Default Answers" task from the certification report, but a warning label can be added to all workflows to highlight that the default answers do not form part of the certification report.		31-5-2022	

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-Apr-21</p> <p>To: 18-Apr-22</p>	<p>At least 68 category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>At the time of the audit the controls were weak because they were insufficient to identify examples of non-compliant metering installations. Following the audit, the document called "Photo Checking Actions – Cat-1 & Cat-2" was updated to include checks of low burden and errors outside the combined class error of the components. I have therefore recorded the controls as moderate, and their effectiveness will be checked during the next audit.</p> <p>A presentation by the Electricity Authority in April 2019 indicated the total cost to a consumer over the 10-year certification where CTs were under burdened was between \$3,200 and \$9,200. This assumption was based on over recording of 1.0%, but more recent information suggests over recording of 0.5% is a more reasonable assumption. Therefore, the total cost to consumers for the 68 ICPs identified could be between \$108,800 and \$312,800, or \$10,880 to \$31,280 per annum. There is also an impact on five MEPs because certification is cancelled for these installations, and this can have an impact their compliance and potentially their audit frequency.</p> <p>I have therefore concluded the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Installations with low burden have been identified, the MEPs advised by email.</p> <p>Revisits for re-testing and burden resistor installation if required are now being planned.</p>	<p>Completed</p> <p>31-7-2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	

<ul style="list-style-type: none"> -Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit. -An initial Cat-2 Teams Training session has been held this week. -Cat-2 Photochecker Training and Check-points are being reviewed. -Cat-2 Photochecker actions document has been amended to include additional Check-points. -Additional new Cat-2 Datachecking being put in place. -Options for automated Datachecking being investigated 	<p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>30-6-2022</p>	
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Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 Of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 18-Apr-22</p>	<p>At least 68 category 2 installations certified with in-service burden lower than the burden range of the CTs.</p> <p>Three ICPs with burden higher than the rated burden.</p> <p>Potential impact: High</p> <p>Actual impact: High</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	
High	<p>At the time of the audit the controls were weak because they were insufficient to identify examples of non-compliant metering installations. Following the audit, the document called "Photo Checking Actions – Cat-1 & Cat-2" was updated to include checks of low burden and errors outside the combined class error of the components. I have therefore recorded the controls as moderate, and their effectiveness will be checked during the next audit.</p> <p>A presentation by the Electricity Authority in April 2019 indicated the total cost to a consumer over the 10-year certification where CTs were under burdened was between \$3,200 and \$9,200. This assumption was based on over recording of 1.0%, but more recent information suggests over recording of 0.5% is a more reasonable assumption. Therefore, the total cost to consumers for the 68 ICPs identified could be between \$108,800 and \$312,800, or \$10,880 to \$31,280 per annum. There is also an impact on five MEPs because certification is cancelled for these installations, and this can have an impact their compliance and potentially their audit frequency.</p> <p>I have therefore concluded the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Installations with low burden have been identified, the MEPs advised by email.</p> <p>Revisits for re-testing and burden resistor installation if required are now being planned.</p>	<p>Completed</p> <p>31-7-2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.	31-5-2022	
-An initial Cat-2 Teams Training session has been held this week.	Completed	
-Cat-2 Photochecker Training and Check-points are being reviewed.	31-5-2022	
-Cat-2 Photochecker actions document has been amended to include additional Check-points.	Completed	
-Additional new Cat-2 Datachecking being put in place.	31-5-2022	
-Options for automated Datachecking being investigated	30-6-2022	

Location of Metering Installation Certification Stickers			
Non-compliance	Description		
<p>Audit Ref: 5.46</p> <p>With: Clause 41(1) and 41(9) of Schedule 10.7</p> <p>From: 20-Jul-21</p> <p>To: 01-May-22</p>	<p>Old certification sticker not removed for one installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>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.</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
- The installations will be revisited to have superseded sticker(s) removed.		31-7-2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
-Additional training has been provided via weekly Metering Reminders.		31-5-2022	
-Cat-2 Photochecker Training and Check-points are being reviewed.		31-5-2022	
-We will look into options for identifying superseded stickers and flagging them for removal as and when it is feasible to do so		30-6-2022	

Requirement for Calibration of Metering Components		
Non-compliance	Description	
<p>Audit Ref: 5.59</p> <p>With: Clause 7(2) Of Schedule 10.4</p> <p>From: 01-Apr-21</p> <p>To: 18-Apr-22</p>	<p>Up to 324 sets of CTs certified without calibration.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>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.</p> <p>The impact is low because prevailing load tests were conducted, and the installations are confirmed to be recording accurately.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Investigations into identifying the installations will be conducted, records for the installations will be corrected and the MEPs advised by email.	30-6-2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.</p> <p>-An initial Cat-2 Teams Training session has been held this week.</p> <p>-Cat-2 Photochecker Training and Check-points are being reviewed.</p> <p>-Cat-2 Photochecker actions document has been amended to include additional Check-points.</p> <p>-Additional new Cat-2 Datachecking being put in place.</p> <p>-Options for automated Datachecking being investigated</p>	<p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>Completed</p> <p>31-5-2022</p> <p>30-6-2022</p>	

Meter Certification		
Non-compliance	Description	
Audit Ref: 5.64 With: Clause 1 of Schedule 10.8 From: 03-Sep-21 To: 18-Apr-22	Meter number 208137248 at ICP 0006475345RN7AB was recorded as recertified but it does not have a calibration report and is therefore not certified. Potential impact: Medium Actual impact: Low Audit history: None 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
Records for the installations will be corrected and the MEPs advised by email.	31-5-2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
-Additional training will be provided to the tech concerned. -Further related training will be provided via weekly Metering Reminders. -Photochecker Training and Check-points are being reviewed. -Options for automated datachecking being investigated	31-5-2022 30-6-2022 31-5-2022 30-6-2022	

Measuring Transformer Certification		
Non-compliance	Description	
<p>Audit Ref: 5.67</p> <p>With: Clause 3 of Schedule 10.8</p> <p>From: 01-Apr-21</p> <p>To: 18-Apr-22</p>	<p>Burden range not recorded in CT certification reports for two metering installations.</p> <p>Incorrect burden ranges recorded for two category 2 metering installations.</p> <p>Up to 324 category 2 metering installations with CTs certified without calibration being carried out.</p> <p>Potential impact: Low</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	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is low because prevailing load tests were conducted, and the installations are confirmed to be recording accurately.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Records for the installations have been corrected and the MEP advised by email.</p> <p>Investigations into identifying the installations will be conducted, records for the installations will be corrected and the MEPs advised by email.</p>	<p>Completed</p> <p>30-6-2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Workflows were modified after 1 st Feb 2021 to cater for Burden Range recording.	Completed	
-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.	31-5-2022	
-An initial Cat-2 Teams Training session has been held this week.	Completed	
-Cat-2 Photochecker Training and Check-points are being reviewed.	31-5-2022	
-Cat-2 Photochecker actions document has been amended to include additional Check-points.	Completed	
-Additional new Cat-2 Datachecking being put in place.	31-5-2022	
-Options for automated Datachecking being investigated	30-6-2022	

Measuring Transformers in service burden range		
Non-compliance	Description	
<p>Audit Ref: 5.68</p> <p>With: Clause 2(1)(E) Of Schedule 10.8</p> <p>From: 01-Feb-21</p> <p>To: 13-May-21</p>	<p>Burden range not recorded in CT certification reports for two metering installations.</p> <p>Incorrect burden ranges recorded for two category 2 metering installations.</p> <p>Potential impact: Low</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	
Low	<p>I have recorded that the controls are moderate as Wells has updated its processes to record burden ranges, but the range is not always correct.</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
Records for the installations have been corrected and the MEP advised by email.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Workflows were modified after 1 st Feb 2021 to cater for Burden Range recording.	Completed	
-Additional Cat-2 Training is being provided via weekly Metering Reminders with some having already been given since the audit.	31-5-2022	
-An initial Cat-2 Teams Training session has been held this week.	Completed	
-Cat-2 Photochecker Training and Check-points are being reviewed.	31-5-2022	
-Cat-2 Photochecker actions document has been amended to include additional Check-points.	Completed	
-Additional new Cat-2 Datachecking being put in place.	31-5-2022	
-Options for automated Datachecking being investigated	30-6-2022	