




Compliance Plan for Wells Class B ATH – December 2020

Provision of Accurate Information			
Non-compliance		Description	
Audit Ref: 2.2 With: Clause 10.6 of Part 10 From: 01-Dec-17 To: 17-Nov-18		Services access interface incorrectly recorded for 2 of 44 records. Maximum interrogation cycle not recorded correctly for 3 of 44 records. Certification expiry dates incorrectly calculated for five category 2 metering installations. Audit report not provided with ATH application for approval. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6	
Audit risk rating		Rationale for audit risk rating	
Medium		I have recorded the controls as weak as the processes have not ensured that an appropriate audit report was provided. As the interim audit report was published on the EA website MEPs would expect it to be correct representation of the Wells ATH's level of compliance. There is likely to be an impact on MEPs where the resolutions identified in the interim audit were not implemented, therefore the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date	Remedial action status

<div>1. The SAI for both 1000593239PCB96 & 1000593800PC835 was incorrectly recorded as Remote where the meters installed were legacy meters which can only be read locally & manually.</div> <div>Con-X record</div> <div><table><tr><td>Service Access Interface</td><td>Remote</td><td>Pass</td><td>JXH3149</td><td>20/10/2020 3:55:46 PM</td></tr></table><div>Metering Installation Certification Report excerpt</div><div><table><tr><td>Certification Method</td><td>Selected Component</td></tr><tr><td>Installation Type</td><td>Residential</td></tr><tr><td>Certification Type</td><td>New Cert</td></tr><tr><td>Service Access Interface</td><td>Remote</td></tr><tr><td>Maximum Interrogation Period</td><td>90</td></tr></table></div><div>Con-X record</div><div><table><tr><td>Service Access Interface</td><td>Remote</td><td>Pass</td><td>JXH3149</td><td>19/10/2020 10:03:52 AM</td></tr></table><div>Metering Installation Certification Report excerpt</div><div><table><tr><td>Certification Method</td><td>Selected Component</td></tr><tr><td>Installation Type</td><td>Residential</td></tr><tr><td>Certification Type</td><td>New Cert</td></tr><tr><td>Service Access Interface</td><td>Remote</td></tr><tr><td>Maximum Interrogation Period</td><td>90</td></tr></table></div></div></div>	Service Access Interface	Remote	Pass	JXH3149	20/10/2020 3:55:46 PM	Certification Method	Selected Component	Installation Type	Residential	Certification Type	New Cert	Service Access Interface	Remote	Maximum Interrogation Period	90	Service Access Interface	Remote	Pass	JXH3149	19/10/2020 10:03:52 AM	Certification Method	Selected Component	Installation Type	Residential	Certification Type	New Cert	Service Access Interface	Remote	Maximum Interrogation Period	90	<div>25-1-21</div>	<div>Disputed</div> <div>Post audit comment by auditor contained in Appendix 1</div> <div>Post audit comment by auditor contained</div>		
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<div>2. Jobs for ICPs 0006102195WE1BE, 1000593239PCB96 and 1000593800PC835 all used VAMS Design Report “NGC Legacy 2109-001” which gives a Maximum Interrogation Period of 90 Days, so what was recorded was correct.</div> <div><div>Metering Installation Design Report</div><div>This drawing fulfils the requirements of a metering installation design report as required by the Electricity Industry Participation Code – Part 10 when used as the basis of metering work performed under Wells’ Class B Approved Test House</div><table><tr><td>Configuration Schemes</td><td colspan="3">N/A</td></tr><tr><td>Scheme Approving ATL</td><td colspan="3">N/A</td></tr><tr><td>Maximum Interrogation Cycle</td><td>NHH</td><td colspan="2">90 days</td></tr><tr><td>Compensation Factors</td><td>Cat-1 Legacy Meter</td><td colspan="2">Nil</td></tr><tr><td>Method of Certification</td><td>Cat-1 Legacy Meter</td><td colspan="2">Selected Component</td></tr><tr><td>Service Access Interface</td><td>NHH with no comms</td><td colspan="2">Local Manual Read</td></tr><tr><td>Design Approving ATH</td><td>Wells Instrument & Electrical Services Ltd</td><td>Signatory</td><td>L. Robertson</td></tr><tr><td>Signed</td><td></td><td>Date</td><td>31-1-17</td></tr></table></div>	Configuration Schemes	N/A			Scheme Approving ATL	N/A			Maximum Interrogation Cycle	NHH	90 days		Compensation Factors	Cat-1 Legacy Meter	Nil		Method of Certification	Cat-1 Legacy Meter	Selected Component		Service Access Interface	NHH with no comms	Local Manual Read		Design Approving ATH	Wells Instrument & Electrical Services Ltd	Signatory	L. Robertson	Signed		Date	31-1-17		
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<div>3. It was made clear from the MEP’s job instructions that these installations were all new, and that the MEP had installed the meter and CTs themselves just prior to requesting us to certify the installations. There was no indication provided that the installations had existing certification, nor were there any metering installation certification stickers and therefore the Installation Certification Expiry Date was correctly recorded as 10 years from the date that our</div>		<div>Post audit comment by auditor contained</div>																																

<p>technician visited and certified the installation.If the MEP had submitted incorrect certification details to the registry prior to our visit, then Sched 10.6 Cl 6</p> <p>6 Provision of metering records when ATH recertifying metering installation</p> <p>(1) This clause applies if—</p> <p>(a) a metering equipment provider contracts with an ATH to recertify a metering installation for which the metering equipment provider is responsible; and</p> <p>(b) the ATH did not perform the previous certification of the metering installation.</p> <p>(2) If this clause applies, the metering equipment provider must, no later than 10 business days after the effective date of the contract, provide the ATH with a copy of all relevant metering records.</p> <p>and Cl 10.4 (2)</p> <p>(2) If a participant (participant A) incorrectly populates the registry, causing another participant (participant B) to breach an obligation under this Code, and participant B relies, in good faith, on the incorrect information in the registry, participant B has not breached its obligation.</p> <p>would apply, making this situation the MEP’s responsibility, and not something we could have reasonably foreseen or avoided.</p> <p>4. We cannot see what identifies the interim report as not being a “final” report, and therefore saw no reason for it not to be included with our approval renewal application in 2019, particularly since it addressed all but one of the 2018 audit issues.</p> <p>Our 2020 reapproval application included the 2018 audit reports. In addition we provided the report from the audit we commissioned to assess the changes we had made to address issues raised in the 2018 audit, as well as copies of communications relating to CT burdening and how the remaining audit issue would be addressed.</p> <p>With both reports published on the EA website, and the only remaining issue identified in the interim audit report having been addressed with the MEPs concerned and with the EA, we are unclear by it is considered not to be a correct representation of the Wells ATH’s level of compliance and where the suggested risk to MEPs is.</p>		<p>d in Appendix 1</p> <p>Post audit comment by auditor contained in Appendix 1</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<ol style="list-style-type: none"> 1. This will be discussed with the technician concerned, and additional refresher training sent to all technicians 2. No action required 3. We cannot identify any action on our part which could prevent a recurrence 4. To create controls to prevent the submission of an incorrect audit report from happening again (if it indeed is incorrect), we would need a clear definition and indicator of what defines/indicates a “final” audit report, and why our interim audit report was deemed sufficient for the EA to issue re-approval and extend our next audit date further than the 2018 audit had recommended, but is deemed by this audit to have been non-complaint. If neither ourselves or the EA identified the 2019 interim audit report as not being suitable for use in a re-approval application, then we suggest if this is an issue, that the identification of the audit reports requires improvement. 	29-1-21	
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ATH Approval		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 10.40 of Part 10</p> <p>From: 04-Mar-20</p> <p>To: 01-Dec-20</p>	<p>Audit report not provided with ATH application for approval.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as weak as the processes have not ensured that an appropriate audit report was provided.</p> <p>As the interim audit report was published on the EA website MEPs would expect it to be correct representation of the Wells ATH's level of compliance. There is likely to be an impact on MEPs where the resolutions identified in the interim audit were not implemented, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
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		Disputed
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Preventative actions taken to ensure no further issues will occur		Completion date




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Metering Installation Type		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7 From: 19-Oct-20 To: 01-Dec-20	Services access interface incorrectly recorded for 2 of 44 records. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate because there is room for improvement. 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		Remedial action status
		Completion date

<p>The SAI for both 1000593239PCB96 & 1000593800PC835 was incorrectly recorded as Remote where the meters installed were legacy meters which can only be read locally & manually.</p> <p>Con-X record</p> <table><tr><td>Service Access Interface</td><td>Remote</td><td>Pass</td><td>JXH3149</td><td>20/10/2020 3:55:46 PM</td></tr></table> <p>Metering Installation Certification Report excerpt</p> <table><tr><td>Certification Method</td><td>Selected Component</td></tr><tr><td>Installation Type</td><td>Residential</td></tr><tr><td>Certification Type</td><td>New Cert</td></tr><tr><td>Service Access Interface</td><td>Remote</td></tr><tr><td>Maximum Interrogation Period</td><td>90</td></tr></table> <p>Con-X record</p> <table><tr><td>Service Access Interface</td><td>Remote</td><td>Pass</td><td>JXH3149</td><td>19/10/2020 10:03:52 AM</td></tr></table> <p>Metering Installation Certification Report excerpt</p> <table><tr><td>Certification Method</td><td>Selected Component</td></tr><tr><td>Installation Type</td><td>Residential</td></tr><tr><td>Certification Type</td><td>New Cert</td></tr><tr><td>Service Access Interface</td><td>Remote</td></tr><tr><td>Maximum Interrogation Period</td><td>90</td></tr></table>	Service Access Interface	Remote	Pass	JXH3149	20/10/2020 3:55:46 PM	Certification Method	Selected Component	Installation Type	Residential	Certification Type	New Cert	Service Access Interface	Remote	Maximum Interrogation Period	90	Service Access Interface	Remote	Pass	JXH3149	19/10/2020 10:03:52 AM	Certification Method	Selected Component	Installation Type	Residential	Certification Type	New Cert	Service Access Interface	Remote	Maximum Interrogation Period	90	25-1-21	Identified
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Services Access Interface					
Non-compliance		Description			
Audit Ref: 3.5 With: Clause 10 of Schedule 10.4 From: 19-Oct-20 To: 01-Dec-20		Services access interface incorrectly recorded for 2 of 44 records. Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2			
Audit risk rating		Rationale for audit risk rating			
Low		I have recorded the controls as moderate because there is room for improvement. 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
<p>The SAI for both 1000593239PCB96 & 1000593800PC835 was incorrectly recorded as Remote where the meters installed were legacy meters which can only be read locally & manually.</p> <p>Con-X record</p> <div><div>Service Access Interface</div><div>Remote</div><div>Pass</div><div>JXH3149</div><div>20/10/2020 3:55:46 PM</div></div> <p>Metering Installation Certification Report excerpt</p> <div><div>Certification Method</div><div>Installation Type</div><div>Certification Type</div><div>Service Access Interface</div><div>Maximum Interrogation Period</div><div>Selected Component</div><div>Residential</div><div>New Cert</div><div>Remote</div><div>90</div></div> <p>Con-X record</p> <div><div>Service Access Interface</div><div>Remote</div><div>Pass</div><div>JXH3149</div><div>19/10/2020 10:03:52 AM</div></div> <p>Metering Installation Certification Report excerpt</p> <div><div>Certification Method</div><div>Installation Type</div><div>Certification Type</div><div>Service Access Interface</div><div>Maximum Interrogation Period</div><div>Selected Component</div><div>Residential</div><div>New Cert</div><div>Remote</div><div>90</div></div>				25-1-21	Identified
Preventative actions taken to ensure no further issues will occur				Completion date	
This will be discussed with the technician concerned, and additional refresher training sent to all technicians				29-1-21	

Meter Requirements																																			
Non-compliance		Description																																	
Audit Ref: 3.11 With: Clause 26(4) of Schedule 10.7 From: 19-Oct-20 To: 01-Dec-20		Maximum interrogation cycle recorded incorrectly for 3 metering installations. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2																																	
Audit risk rating		Rationale for audit risk rating																																	
Low		I have recorded the controls as moderate because there is room for improvement. There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.																																	
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No action required		21-1-21																																	

Determine Maximum Interrogation Cycle																																			
Non-compliance		Description																																	
Audit Ref: 3.14 With: Clause 36(3) of Schedule 10.7 From: 19-Oct-20 To: 01-Dec-20		Maximum interrogation cycle recorded incorrectly for 3 metering installations. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2																																	
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Data Storage Device Certification		
Non-compliance	Description	
<p>Audit Ref: 4.12</p> <p>With: Clause 5 of Schedule 10.8</p> <p>From: 01-Jan-12</p> <p>To: 16-Sep-20</p>	<p>472 data storage devices certified when they do not comply with the Code, as recorded in the type test report.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as weak because although type test reports are obtained by Wells, it doesn't appear they are checked in sufficient detail to determine compliance.</p> <p>The impact on settlement is minor because interrogation occurs daily, but when power is lost then restored there is a risk of losing data for a small number of ICPs. The greater impact is on ARC Innovations, because it appears the certification of Generation 2 data storage devices may be invalid.</p>	
Actions taken to resolve the issue		Completion date
<p>The MEP concerned was contacted for comment immediately following this audit, and whilst they acknowledged the alleged breach, it appears that the registry had not been updated with cancellations to the installation certifications, jobs had</p>		21-1-21
		Disputed

<p>continued to be issued to us for installations containing ARC devices, and we had not been made aware of the alleged breach.</p> <p>400 of the 488 installations listed have Gen 1 model data storage devices and we have had on file since January 2012 a Type Test Report for the ESM 2052 (Gen 1) device which showed that model to be compliant with Electricity Industry Participation Code 2010, Schedule 10.1, Code of Practice 10.4. If there has been a subsequent Type Test Report produced for this device, we were not made aware of it by the MEP and we are unclear how we could have known of its existence, and the potential non-compliances identified within it.</p> <p>Of the remaining 88 jobs at installations with Gen 2 model data storage devices, 38 of the jobs did not involve device replacement as they were meter un-bridge's, reseals and the like. Our interpretation of the requirements is that if all indications were that an installation had existing valid certification prior to a meter being bridged, and all we were requested to do was un-bridge a meter, reseal, and recertify the installation (retaining the existing expiry date), and we were confident that the accuracy and continued integrity of the metering installation had not been affected, we are unaware of any requirement to perform additional tests or to check the validity of the existing certifications.</p> <p>Of the remaining 50 jobs with Gen 2 model data storage devices, just 7 were completed as BAU device replacement jobs within the audit period, 1-12-18 until 1-12-20.</p> <p>Until this alleged breach was mentioned during our audit, we were unaware of the Gen 2 model, which from our subsequent research appears that it started to be supplied to us in the first part of 2017, We have no record of a Type Test report having been supplied to us by the MEP as is expected. Even our field supervisor was unclear on the exact difference between the Gen 1 and Gen 2 models.</p> <p>In line with our longstanding arrangement with the MEP that they would only supply us with compliant equipment for like-for-like replacements, where the MEP has ultimate responsibility for ensuring the metering components and the installation in which they are installed is compliant, we had no reason to believe there was any issue with any ARC devices, however we had not been formally made aware of the model change, nor of the non-compliance and alleged breach that resulted from their audit, even 12 months after that audit. Additionally there do not appear to have been any steps taken by the MEP to prevent further similar alleged breaches from occurring.</p>		<p>Post audit comment by auditor contained in Appendix 1</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p>All jobs involving the recertification of installations containing an ARC device were halted immediately and the MEP made aware of our stance.</p> <p>A copy of the latest Type Test Reports for these two devices have now been obtained from the MEP.</p> <p>If it is in fact a requirement that the validity of all existing device certifications in an installation be verified when recertifying an installation, then we will amend our procedures accordingly, however we do not believe this is a code requirement at this time. If it were to become a requirement, then it will obviously carry a cost to the industry in the additional time spent verifying existing device certifications at every installation recertification.</p> <p>Additionally, we will no longer act in good faith that all MEP supplied devices, even for use as like-for-like replacements, are, or will be compliant.</p>	21-1-21	
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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: 10-Jan-20</p> <p>To: 01-Dec-20</p>	<p>7 Category 2 metering installations certified with burden lower than 25% of the rated burden.</p> <p>ICP 0230120008PN0F0 had an absolute error and uncertainty test result of 2.47%, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as moderate because there is room for improvement in order to identify such situations.</p> <p>The impact on settlement could be moderate, and the impact on MEPs is moderate because certification is cancelled, leading to non-compliance for the MEP in addition to non-compliance for Wells; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
1. The 7 installations all had TWS CTs installed. All 3 CT models involved are compensated.		21-1-21	Disputed

<p>0007109459RNB49 SEV86A 0005853300CN70D SEW90B 0001602275WMC79 SEV86A 0009060320WM593 SEV86A 0272000121PN00F SEV87 0110110060PNF11 SEV86A 1001280367TC8A6 SEV86A</p> <p>2 of the 3 CT models have been said by TWS to remain in class at low burden. This leaves just 0005853300CN70D which did require additional burden. Job notes from the MEP stated “Burden resistors ARE NOT REQUIRED as there are some already fitted” which presumably caused the tech to not install more, even though the CTs failed the burden test.</p> <p>2 We will bring to the attention of the MEP concerned, the test result for this installation.</p>		<p>Post audit comment by auditor contained in Appendix 1</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>1. Even though the MEP has ultimate responsibility for the metering installation and its certification compliance, technicians, photocheckers and datacheckers will be instructed that the results of tests over-ride any comments from the MEP.</p> <p>2. We will modify procedures and workflows to use the sum of the meter and CT classes (already being recorded) as the pass/fail threshold for the Prevailing Load Test’s Combined Absolution Error & Uncertainty instead of the current 2.5%. We suggest that a code re-word is also required to clarify this as a requirement.</p>	<p>26-1-21</p> <p>26-1-21</p>	

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-Jan-12</p> <p>To: 01-Dec-20</p>	<p>7 Category 2 metering installations certified with low burden.</p> <p>472 data storage devices certified when they don't comply with the Code, as recorded in the type test report.</p> <p>ICP 0230120008PN0F0 had an absolute error and uncertainty test result of 2.47%, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as weak because they do not identify instances of non-compliance prior to certification being applied.</p> <p>Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Remedial action status

<p>1. The 7 installations all had TWS CTs installed. All 3 CT models involved are compensated</p> <p>0007109459RNB49 SEV86A 0005853300CN70D SEW90B 0001602275WMC79 SEV86A 0009060320WM593 SEV86A 0272000121PN00F SEV87 0110110060PNF11 SEV86A 1001280367TC8A6 SEV86A</p> <p>2 of the 3 CT models have been said by TWS to remain in class at low burden. This leaves just 0005853300CN70D which did require additional burden. Job notes from the MEP stated "Burden resistors ARE NOT REQUIRED as there are some already fitted" which presumably caused the tech to not install more, even though the CTs failed the burden test.</p> <p>2. The MEP concerned was contacted for comment immediately following this audit, and whilst they acknowledged the alleged breach, it appears that the registry had not been updated with cancellations to the installation certifications, jobs had continued to be issued to us for installations containing ARC devices, and we had not been made aware of the alleged breach.</p> <p>400 of the 488 installations listed have Gen 1 model data storage devices and we have had on file since January 2012 a Type Test Report for the ESM 2052 (Gen 1) device which showed that model to be compliant with Electricity Industry Participation Code 2010, Schedule 10.1, Code of Practice 10.4. If there has been a subsequent Type Test Report produced for this device, we were not made aware of it by the MEP and we are unclear how we could have known of its existence, and the potential non-compliances identified within it.</p> <p>Of the remaining 88 jobs at installations with Gen 2 model data storage devices, 38 of the jobs did not involve device replacement as they were meter un-bridge's, reseals and the like. Our interpretation of the requirements is that if all indications were that an installation had existing valid certification prior to a meter being bridged, and all we were requested to do was un-bridge a meter, reseal, and recertify the installation (retaining the existing expiry date), and we were confident that the accuracy and continued integrity of the metering installation had not been affected, we are unaware of any requirement to perform additional tests or to check the validity of the existing certifications.</p>	<p>21-1-21</p>	<p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p> <p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p>
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<p>Of the remaining 50 jobs with Gen 2 model data storage devices, just 7 were completed as BAU device replacement jobs within the audit period, 1-12-18 until 1-12-20.</p> <p>Until this alleged breach was mentioned during our audit, we were unaware of the Gen 2 model, which from our subsequent research appears that it started to be supplied to us in the first part of 2017, We have no record of a Type Test report having been supplied to us by the MEP as is expected. Even our field supervisor was unclear on the exact difference between the Gen 1 and Gen 2 models.</p> <p>In line with our longstanding arrangement with the MEP that they would only supply us with compliant equipment for like-for-like replacements, where the MEP has ultimate responsibility for ensuring the metering components and the installation in which they are installed is compliant, we had no reason to believe there was any issue with any ARC devices, however we had not been formally made aware of the model change, nor of the non-compliance and alleged breach that resulted from their audit, even 12 months after that audit. Additionally there do not appear to have been any steps taken by the MEP to prevent further similar alleged breaches from occurring</p> <p>3. We will bring to the attention of the MEP concerned, the test result for this installation.</p>		Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p>1. Even though the MEP has ultimate responsibility for the metering installation and its certification compliance, technicians, photocheckers and datacheckers will be instructed that the results of tests over-ride any comments from the MEP.</p>	26-1-21	
<p>2. All jobs involving the recertification of installations containing an ARC device were halted immediately and the MEP made aware of our stance.</p> <p>A copy of the latest Type Test Reports for these two devices have now been obtained from the MEP.</p> <p>If it is in fact a requirement that the validity of all existing device certifications in an installation be verified when recertifying an installation, then we will amend our procedures accordingly, however we do not believe this is a code requirement at this time. If it were to become a requirement, then it will obviously carry a cost to the industry in the additional time spent verifying existing device certifications at every installation recertification.</p> <p>Additionally, we will no longer act in good faith that all MEP supplied devices, even for use as like-for-like replacements, are, or will be compliant.</p>	21-1-21	
<p>3. We will modify procedures and workflows to use the sum of the meter and CT classes (already being recorded) as the pass/fail threshold for the Prevailing Load Test's Combined Absolution Error & Uncertainty instead of the current 2.5%. We suggest that a code re-word is also required to clarify this as a requirement.</p>	26-1-21	

Non-compliance	Description
<p>Audit Ref: 5.18</p> <p>With: Clause 11(4) of Schedule 10.7</p> <p>From: 01-Jan-12</p> <p>To: 16-Sep-20</p>	<p>461 installations certified as HHR despite the data storage devices not being accurate or fit for purpose.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
<p>High</p>	<p>The controls are recorded as weak because data storage devices have been certified for many years despite not being suitable for recording HHR.</p> <p>The impact on settlement is major because each HHR interval has a different price and consumption is being recorded in the incorrect intervals. There is also a major impact on the MEP because certification is cancelled. The other major impact is on retailers due to inaccurate invoicing and because they may need to arrange for displacement.</p>

<p>The MEP concerned was contacted for comment immediately following this audit, and whilst they acknowledged the alleged breach, it appears that the registry had not been updated with cancellations to the installation certifications, jobs had continued to be issued to us for installations containing ARC devices, and we had not been made aware of the alleged breach.</p> <p>400 of the 488 installations listed have Gen 1 model data storage devices and we have had on file since January 2012 a Type Test Report for the ESM 2052 (Gen 1) device which showed that model to be compliant with Electricity Industry Participation Code 2010, Schedule 10.1, Code of Practice 10.4. If there has been a subsequent Type Test Report produced for this device, we were not made aware of it by the MEP and we are unclear how we could have known of its existence, and the potential non-compliances identified within it.</p> <p>Of the remaining 88 jobs at installations with Gen 2 model data storage devices, 38 of the jobs did not involve device replacement as they were meter un-bridge's, reseals and the like. Our interpretation of the requirements is that if all indications were that an installation had existing valid certification prior to a meter being bridged, and all we were requested to do was un-bridge a meter, reseal, and recertify the installation (retaining the existing expiry date), and we were confident that the accuracy and continued integrity of the metering installation had not been affected, we are unaware of any requirement to perform additional tests or to check the validity of the existing certifications.</p> <p>Of the remaining 50 jobs with Gen 2 model data storage devices, just 7 were completed as BAU device replacement jobs within the audit period, 1-12-18 until 1-12-20.</p> <p>Until this alleged breach was mentioned during our audit, we were unaware of the Gen 2 model, which from our subsequent research appears that it started to be supplied to us in the first part of 2017, We have no record of a Type Test report having been supplied to us by the MEP as is expected. Even our field supervisor was unclear on the exact difference between the Gen 1 and Gen 2 models.</p> <p>In line with our longstanding arrangement with the MEP that they would only supply us with compliant equipment for like-for-like replacements, where the MEP has ultimate responsibility for ensuring the metering components and the installation in which they are installed is compliant, we had no reason to believe there was any issue with any ARC devices, however we had not been formally made aware of the model change, nor of the non-compliance and alleged breach that resulted from their audit, even 12 months after that audit. Additionally there do not appear to have been any steps taken</p>	<p>21-1-21</p>	<p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p>
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by the MEP to prevent further similar alleged breaches from occurring		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All jobs involving the recertification of installations containing an ARC device were halted immediately and the MEP made aware of our stance.</p> <p>A copy of the latest Type Test Reports for these two devices have now been obtained from the MEP.</p> <p>If it is in fact a requirement that the validity of all existing device certifications in an installation be verified when recertifying an installation, then we will amend our procedures accordingly, however we do not believe this is a code requirement at this time. If it were to become a requirement, then it will obviously carry a cost to the industry in the additional time spent verifying existing device certifications at every installation recertification.</p> <p>Additionally, we will no longer act in good faith that all MEP supplied devices, even for use as like-for-like replacements, are, or will be compliant.</p>	26-1-21	

Comparative Recertification – Circumstances where method may be used			
Non-compliance	Description		
<p>Audit Ref: 5.19</p> <p>With: Clause 12(2) of Schedule 10.7</p> <p>From: 05-May-20</p> <p>To: 01-Dec-20</p>	<p>Incorrect use of comparative recertification method 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>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
It was believed that the meter and CTs at this installation were new and installed by the MEP prior to our visit. There was no knowledge or onsite evidence of a previous certification. The certification method should therefore have been Selected Component		21-1-21	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Additional training will be given to both metering techs and data checkers to ensure this does not recur	26-1-21	

Certification Validity Periods			
Non-compliance	Description		
<p>Audit Ref: 5.28</p> <p>With: Clause 17 of Schedule 10.7</p> <p>From: 05-May-20</p> <p>To: 01-Dec-20</p>	<p>Certification expiry dates incorrectly calculated for five category 2 metering installations.</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>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
It was made clear from the MEP's job instructions that these installations were all new, and that the MEP had installed the meter and CTs themselves		21-1-21	Disputed

<p>just prior to requesting us to certify the installations. There was no indication provided that the installations had existing certification, nor were there any metering installation certification stickers and therefore the Installation Certification Expiry Date was correctly recorded as 10 years from the date that our technician visited and certified the installation.</p> <p>If the MEP had submitted incorrect certification details to the registry prior to our visit, then Sched 10.6 Cl 6</p> <p>6 Provision of metering records when ATH recertifying metering installation</p> <p>(1) This clause applies if—</p> <p>(a) a metering equipment provider contracts with an ATH to recertify a metering installation for which the metering equipment provider is responsible; and</p> <p>(b) the ATH did not perform the previous certification of the metering installation.</p> <p>(2) If this clause applies, the metering equipment provider must, no later than 10 business days after the effective date of the contract, provide the ATH with a copy of all relevant metering records.</p> <p>and Cl 10.4 (2)</p> <p>(2) If a participant (participant A) incorrectly populates the registry, causing another participant (participant B) to breach an obligation under this Code, and participant B relies, in good faith, on the incorrect information in the registry, participant B has not breached its obligation.</p> <p>would apply, making this situation the MEP's responsibility, and not something we could have reasonably foreseen or avoided.</p>		Post audit comment by auditor contained in Appendix 1
Preventative actions taken to ensure no further issues will occur	Completion date	
We cannot identify any action on our part which could prevent a recurrence	21-1-21	

Determine Metering Installation Certification Expiry Date	
Non-compliance	Description
<p>Audit Ref: 5.34</p> <p>With: Clause 27(1) & (2) Of Schedule 10.7</p> <p>From: 05-May-20</p> <p>To: 01-Dec-20</p>	<p>Certification expiry dates incorrectly calculated for five category 2 metering installations.</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>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>It was made clear from the MEP's job instructions that these installations were all new, and that the MEP had installed the meter and CTs themselves just prior to requesting us to certify the installations. There was no indication provided that the installations had existing certification, nor were there any metering installation certification stickers and therefore the Installation Certification Expiry Date was correctly recorded as 10 years from the date that our technician visited and certified the installation.</p> <p>If the MEP had submitted incorrect certification details to the registry prior to our visit, then Sched 10.6 Cl 6</p> <p>6 Provision of metering records when ATH recertifying metering installation</p> <p>(1) This clause applies if—</p> <p>(a) a metering equipment provider contracts with an ATH to recertify a metering installation for which the metering equipment provider is responsible; and</p> <p>(b) the ATH did not perform the previous certification of the metering installation.</p> <p>(2) If this clause applies, the metering equipment provider must, no later than 10 business days after the effective date of the contract, provide the ATH with a copy of all relevant metering records.</p> <p>and Cl 10.4 (2)</p> <p>(2) If a participant (participant A) incorrectly populates the registry, causing another participant (participant B) to breach an obligation under this Code, and participant B relies, in good faith, on the incorrect information in the registry, participant B has not breached its obligation.</p> <p>would apply, making this situation the MEP's responsibility, and not something we could have reasonably foreseen or avoided.</p>	21-1-21	<p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
We cannot identify any action on our part which could prevent a recurrence	21-1-21	

Measuring Transformer Certification Expiry Date			
Non-compliance		Description	
Audit Ref: 5.38 With: Clause 29 of Schedule 10.7 From: 05-May-20 To: 01-Dec-20		CT certification expiry dates incorrectly calculated for five category 2 metering installations. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		I have recorded the controls as moderate because there is room for improvement. There is no impact on the accuracy of the metering installation; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
<p>It was made clear from the MEP's job instructions that these installations were all new, and that the MEP had installed the meter and CTs themselves just prior to requesting us to certify the installations. There was no indication provided that the installations had existing certification, nor were there any metering installation certification stickers and therefore the Installation Certification Expiry Date was correctly recorded as 10 years from the date that our technician visited and certified the installation.</p> <p>If the MEP had submitted incorrect certification details to the registry prior to our visit, then Sched 10.6 Cl 6</p> <p>6 Provision of metering records when ATH recertifying metering installation</p> <p>(1) This clause applies if—</p> <p>(a) a metering equipment provider contracts with an ATH to recertify a metering installation for which the metering equipment provider is responsible; and</p> <p>(b) the ATH did not perform the previous certification of the metering installation.</p> <p>(2) If this clause applies, the metering equipment provider must, no later than 10 business days after the effective date of the contract, provide the ATH with a copy of all relevant metering records.</p> <p>and Cl 10.4 (2)</p> <p>(2) If a participant (participant A) incorrectly populates the registry, causing another participant (participant B) to breach an obligation under this Code, and participant B relies, in good faith, on the incorrect information in the registry, participant B has not breached its obligation.</p> <p>would apply, making this situation the MEP's responsibility, and not something we could have reasonably foreseen or avoided.</p>		21-1-21	Disputed Post audit comment by auditor contained in Appendix 1
Preventative actions taken to ensure no further issues will occur		Completion date	
We cannot identify any action on our part which could prevent a recurrence		21-1-21	

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 Of Schedule 10.7</p> <p>From: 01-Jan-19</p> <p>To: 01-Dec-20</p>	<p>7 installations had low burden and burden resistors were not installed.</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>There is a process to install burden resistors, but it is not applied to all current transformers therefore the controls are moderate.</p> <p>The impact on settlement is likely to be minor because the overall error of the installations is measured and recorded.</p>	
Actions taken to resolve the issue		Completion date
<p>The 7 installations all had TWS CTs installed. All 3 CT models involved are compensated.</p> <p>0007109459RNB49 SEV86A</p> <p>0005853300CN70D SEW90B</p> <p>0001602275WMC79 SEV86A</p> <p>0009060320WM593 SEV86A</p> <p>0272000121PN00F SEV87</p> <p>0110110060PNF11 SEV86A</p> <p>1001280367TC8A6 SEV86A</p> <p>2 of the 3 CT models have been said by TWS to remain in class at low burden. This leaves just 0005853300CN70D which did require additional burden. Job notes from the MEP stated "Burden resistors ARE NOT REQUIRED as there are some already fitted" which presumably caused the tech to not install more, even though the CTs failed the burden test.</p>		21-1-21
Preventative actions taken to ensure no further issues will occur		Completion date

Even though the MEP has ultimate responsibility for the metering installation and its certification compliance, technicians, photocheckers and datacheckers will be instructed that the results of tests over-ride any comments from the MEP.	26-1-21	
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Data storage device requirements			
Non-compliance	Description		
<p>Audit Ref: 5.45</p> <p>With: Clause 5(1) of Schedule 10.8</p> <p>From: 01-Jan-12</p> <p>To: 16-Sep-20</p>	<p>472 data storage devices certified when they don't comply with the Code, as recorded in the type test report.</p> <p>461 installations certified as HHR despite the data storage devices not being accurate or fit for purpose.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are recorded as weak because data storage devices have been certified for many years despite not being suitable for recording HHR.</p> <p>The impact on settlement is major because each HHR interval has a different price and consumption is being recorded in the incorrect intervals. There is also a major impact on the MEP because certification is cancelled. The other major impact is on retailers due to inaccurate invoicing and because they may need to arrange for displacement.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>The MEP concerned was contacted for comment immediately following this audit, and whilst they acknowledged the alleged breach, it appears that the registry had not been updated with cancellations to the installation certifications, jobs had continued to be issued to us for installations containing ARC devices, and we had not been made aware of the alleged breach.</p> <p>400 of the 488 installations listed have Gen 1 model data storage devices and we have had on file since January 2012 a Type Test Report for the ESM 2052 (Gen 1) device which showed that model to be compliant with Electricity Industry Participation Code 2010, Schedule 10.1, Code of Practice 10.4. If there has been a subsequent Type Test Report produced for this device, we were not made aware of it by the MEP and we are unclear how we could have known of its existence, and the potential non-compliances identified within it.</p> <p>Of the remaining 88 jobs at installations with Gen 2 model data storage devices, 38 of the jobs did not involve device replacement as they were meter un-bridge's, reseals and the like. Our interpretation of the requirements is that if all indications were that an installation had existing valid certification prior to a meter being bridged, and all we were requested to do was un-bridge a meter, reseal, and recertify the installation (retaining the existing expiry date), and we were confident that the accuracy and continued integrity of the metering installation had not been affected, we are unaware of any requirement to perform additional tests or to check the validity of the existing certifications.</p> <p>Of the remaining 50 jobs with Gen 2 model data storage devices, just 7 were completed as BAU device replacement jobs within the audit period, 1-12-18 until 1-12-20.</p> <p>Until this alleged breach was mentioned during our audit, we were unaware of the Gen 2 model, which from our subsequent research appears that it started to be supplied to us in the first part of 2017, We have no record of a Type Test report having been supplied to us by the MEP as is expected. Even our field supervisor was unclear on the exact difference between the Gen 1 and Gen 2 models.</p> <p>In line with our longstanding arrangement with the MEP that they would only supply us with compliant equipment for like-for-like replacements, where the MEP has ultimate responsibility for ensuring the metering components and the installation in which they are installed is compliant, we had no reason to believe there was any issue with any ARC devices, however we had not been formally made aware of the model change, nor of the non-compliance and alleged breach that resulted from their audit, even 12 months after that audit. Additionally there do not appear to have been any steps taken</p>	<p>21-1-21</p>	<p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p>
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by the MEP to prevent further similar alleged breaches from occurring		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All jobs involving the recertification of installations containing an ARC device were halted immediately and the MEP made aware of our stance.</p> <p>A copy of the latest Type Test Reports for these two devices have now been obtained from the MEP.</p> <p>If it is in fact a requirement that the validity of all existing device certifications in an installation be verified when recertifying an installation, then we will amend our procedures accordingly, however we do not believe this is a code requirement at this time. If it were to become a requirement, then it will obviously carry a cost to the industry in the additional time spent verifying existing device certifications at every installation recertification.</p> <p>Additionally, we will no longer act in good faith that all MEP supplied devices, even for use as like-for-like replacements, are, or will be compliant.</p>	21-1-21	

Measuring Transformer Certification			
Non-compliance	Description		
<p>Audit Ref: 5.66</p> <p>With: Clause 3 of Schedule 10.8</p> <p>From: 01-Jan-19</p> <p>To: 01-Dec-20</p>	<p>CTs are certified without calibration being carried out.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded that there are no controls as the Wells processes includes CT certification during comparative recertification.</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
We had not understood that the requirement for all devices to be certified and to carry a certification sticker did not apply to CTs in Comparative Recertification.		21-1-21	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

We will amend our processes to not certify existing CTs under Comparative Recertification.	26-1-21	
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Measuring Transformers In-Service Burden lower than Calibration Test Point Burden		
Non-compliance	Description	
<p>Audit Ref: 5.67</p> <p>With: Clause 2(1)(C) Of Schedule 10.8</p> <p>From: 01-Jan-19</p> <p>To: 01-Dec-20</p>	<p>7 installations had low burden and burden resistors were not installed.</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>There is a process to install burden resistors, but it is not applied to all current transformers therefore the controls are moderate.</p> <p>The impact on settlement is likely to be minor because the overall error of the installations is measured and recorded.</p>	
Actions taken to resolve the issue		Completion date
<p>The 7 installations all had TWS CTs installed. All 3 CT models involved are compensated.</p> <p>0007109459RNB49 SEV86A</p> <p>0005853300CN70D SEW90B</p> <p>0001602275WMC79 SEV86A</p> <p>0009060320WM593 SEV86A</p> <p>0272000121PN00F SEV87</p> <p>0110110060PNF11 SEV86A</p> <p>1001280367TC8A6 SEV86A</p> <p>2 of the 3 CT models have been said by TWS to remain in class at low burden. This leaves just 0005853300CN70D which did require additional burden. Job notes from the MEP stated "Burden resistors ARE NOT REQUIRED as there are some already fitted" which presumably caused the tech to not install more, even though the CTs failed the burden test.</p>		21-1-21
		<p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p>

Preventative actions taken to ensure no further issues will occur	Completion date	
Even though the MEP has ultimate responsibility for the metering installation and its certification compliance, technicians, photocheckers and datacheckers will be instructed that the results of tests over-ride any comments from the MEP.	26-1-21	

Investigation of Faulty Metering Installations			
Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: Clause 10.43(3) of Part 10</p> <p>From: 10-Jan-20</p> <p>To: 01-Dec-20</p>	<p>MEP not notified that 7 metering installations with low burden are not fit for purpose and therefore have cancelled certification.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as moderate because there is room for improvement in order to identify and report on such situations.</p> <p>The impact on settlement could be moderate and the impact on MEPs is moderate because certification is cancelled, leading to non-compliance for the MEP in addition to non-compliance for Wells; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>The 7 installations all had TWS CTs installed. All 3 CT models involved are compensated.</p> <p>0007109459RNB49 SEV86A</p> <p>0005853300CN70D SEW90B</p> <p>0001602275WMC79 SEV86A</p> <p>0009060320WM593 SEV86A</p> <p>0272000121PN00F SEV87</p> <p>0110110060PNF11 SEV86A</p> <p>1001280367TC8A6 SEV86A</p> <p>2 of the 3 CT models have been said by TWS to remain in class at low burden. This leaves just 0005853300CN70D which did require additional burden. Job notes from the MEP stated "Burden resistors ARE NOT REQUIRED as there are some already fitted" which presumably caused the tech to not install more, even though the CTs failed the burden test.</p>	21-1-21	<p>Disputed</p> <p>Post audit comment by auditor contained in Appendix 1</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Even though the MEP has ultimate responsibility for the metering installation and its certification compliance, technicians, photocheckers and datacheckers will be instructed that the results of tests over-ride any comments from the MEP.</p>	26-1-21	