

## Compliance Plan for WEL ATH – May 2021

Metering Installation Type															
Non-compliance		Description													
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7  From: 01-Feb-21 To: 15-Apr-21		Each services access interface not recorded for 25 metering installations certified since 1/02/21.  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												
<div>The following information will be added to the metering installation certification report:</div> <div><div>WASN Meters - U1210, U1310, U1225, U1325, U3300 &amp; U3400 are certified for HHR use</div><table><tr><th>Service Access Interface</th><th>Conditions For Use</th><th>Maximum Interrogation Cycle</th></tr><tr><td>Remote</td><td>AMI meter with comms</td><td>365 days</td></tr><tr><td>Local read with probe</td><td>HHR with no comms</td><td>365 days</td></tr><tr><td>Local manual read</td><td>NHH with no comms</td><td>365 days</td></tr></table></div>			Service Access Interface	Conditions For Use	Maximum Interrogation Cycle	Remote	AMI meter with comms	365 days	Local read with probe	HHR with no comms	365 days	Local manual read	NHH with no comms	365 days	1/06/2021
			Service Access Interface	Conditions For Use	Maximum Interrogation Cycle										
			Remote	AMI meter with comms	365 days										
			Local read with probe	HHR with no comms	365 days										
			Local manual read	NHH with no comms	365 days										
			Preventative actions taken to ensure no further issues will occur			Completion date									
As above			1/06/2021												

Services Access Interface															
Non-compliance		Description													
Audit Ref: 3.5 With: Clause 10 of Schedule 10.4  From: 01-Feb-21 To: 15-Apr-21		Each services access interface not recorded for 25 metering installations certified since 1/02/21.  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												
<div>The following information will be added to the metering installation certification report:</div> <div><div>WASN Meters - U1210, U1310, U1225, U1325, U3300 &amp; U3400 are certified for HHR use</div><table><tr><th>Service Access Interface</th><th>Conditions For Use</th><th>Maximum Interrogation Cycle</th></tr><tr><td>Remote</td><td>AMI meter with comms</td><td>365 days</td></tr><tr><td>Local read with probe</td><td>HHR with no comms</td><td>365 days</td></tr><tr><td>Local manual read</td><td>NHH with no comms</td><td>365 days</td></tr></table></div>			Service Access Interface	Conditions For Use	Maximum Interrogation Cycle	Remote	AMI meter with comms	365 days	Local read with probe	HHR with no comms	365 days	Local manual read	NHH with no comms	365 days	1/06/2021
			Service Access Interface	Conditions For Use	Maximum Interrogation Cycle										
			Remote	AMI meter with comms	365 days										
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			Local manual read	NHH with no comms	365 days										
			Preventative actions taken to ensure no further issues will occur			Completion date									
As above			1/06/2021												

Meter Requirements		
Non-compliance	Description	
Audit Ref: 3.11 With: Clause 26(4) of Schedule 10.7  From: 22-Feb-21 To: 15-Apr-21	Maximum interrogation cycle recorded incorrectly for 13 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	
<b>Low</b>	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.	
The following text will be added to the metering installation certification report to clarify who the MEP is and the appropriate maximum interrogation cycle based on the MEPs meters:  MEP is XXXX. Metering installation maximum interrogation cycle is XXX days.		1/06/2021
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
As above		1/06/2021
		Identified

Determine Maximum Interrogation Cycle																		
Non-compliance		Description																
Audit Ref: 3.14 With: Clause 36(3) of Schedule 10.7  From: 01-Feb-21 To: 15-Apr-21		Maximum interrogation cycle not recorded for each services access interface for 25 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.																
Actions taken to resolve the issue			Completion date															
The following information will be added to the metering installation certification report:  <table><tr><th colspan="3">WASN Meters - U1210, U1310, U1225, U1325, U3300 &amp; U3400 are certified for HHR use</th></tr><tr><th>Service Access Interface</th><th>Conditions For Use</th><th>Maximum Interrogation Cycle</th></tr><tr><td>Remote</td><td>AMI meter with comms</td><td>365 days</td></tr><tr><td>Local read with probe</td><td>HHR with no comms</td><td>365 days</td></tr><tr><td>Local manual read</td><td>NHH with no comms</td><td>365 days</td></tr></table> MEP is XXXX. Metering installation maximum interrogation cycle is XXX days.			WASN Meters - U1210, U1310, U1225, U1325, U3300 & U3400 are certified for HHR use			Service Access Interface	Conditions For Use	Maximum Interrogation Cycle	Remote	AMI meter with comms	365 days	Local read with probe	HHR with no comms	365 days	Local manual read	NHH with no comms	365 days	1/06/2021
WASN Meters - U1210, U1310, U1225, U1325, U3300 & U3400 are certified for HHR use																		
Service Access Interface	Conditions For Use	Maximum Interrogation Cycle																
Remote	AMI meter with comms	365 days																
Local read with probe	HHR with no comms	365 days																
Local manual read	NHH with no comms	365 days																
Preventative actions taken to ensure no further issues will occur			Completion date															
As above			1/06/2021															

Metering Component Stickers		
Non-compliance	Description	
Audit Ref: 4.14 With: Clause 8(2) of Schedule 10.8  From: 01-Jun-18 To: 15-Apr-21	Name of the ATH or the approved calibration laboratory who calibrated the metering component not recorded on certification stickers.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because there is room for improvement. The impact on other participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
L&G to include calibration label on all new meters.		6-6-21
Preventative actions taken to ensure no further issues will occur		Completion date
Spot checks on all new meters received from L&G and existing new stock to have calibration labels attached.		6-6-21
		Investigating

Certification Tests			
Non-compliance	Description		
Audit Ref: 5.12 With: Clause 9(1)(ii)(B) of Schedule 10.7  From: 01-Feb-21 To: 15-Apr-21	ATH did not record the accumulation of pulses when conducting raw meter data tests.  Potential impact: Low Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	I have recorded the controls as moderate as the WEL process prior to 1 February 2021 was compliant.  There is no impact as the WEL process has ensured that testing has been conducted; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
A discussion will take place between WEL and the metering contractor to discuss and implement a process to complete the following:  - a prevailing load test - an installation or component configuration test - a raw meter data output test.		21/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Process will be successfully implemented by the completion date.		30/06/2021	

Location of Metering Installation Certification Stickers			
Non-compliance	Description		
<p>Audit Ref: 5.46</p> <p>With: Clause 41(1) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 15-Apr-21</p>	<p>Invalid metering installation certification stickers not removed or obscured when certifying 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>The controls are recorded as moderate because there is room for improvement.</p> <p>The impact on other participants is minor; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A discussion will take place between the WEL ATH and metering contractor regarding the importance of removing invalid certification stickers		21/05/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As part of WEL's ATH ongoing audit process, we will check installations to ensure invalid stickers are removed.		Changes implemented by 30/6/2021 but this action will be ongoing	

General Inspection Requirements		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 44 (1) (a) to (e) of Schedule 10.7 From: 01-Feb-21 To: 15-Apr-21	Category 1 inspection process does not confirm the operation of the data storage device or check the remaining battery life. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate as the inspection process addresses some but not all of the required inspection checks. The impact on settlement and participants is minor because the MEP conducts the required checks as part of the data collection operation; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
WEL ATH will implement a process where the metering contractor is required to check the operation of the data storage device and check the remaining battery life. The inspection form will be amended to record this information for future reference		21/06/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Process will be implemented and monitored to ensure WEL ATH are meeting this requirement going forward.		30/07/2021
		Identified



Raw Meter Data Test		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 44 (1) (f) of Schedule 10.7  From: 01-Feb-21 To: 15-Apr-21	Category 1 inspection process does not include a check of the master accumulation register and the sum of the meter registers. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate as the inspection process addresses some, but not all of the required inspection checks.  The impact on settlement and participants is minor because MEP conducts the required check as part of the data collection operation; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
WEL ATH will implement a process alongside the metering contractor to check the master accumulation register and the sum of the meter registers. This information will be stored with the inspection information.		21/06/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Process will be implemented and monitored to ensure WEL ATH are meeting this requirement going forward.		30/07/2021