

Compliance Plan for AMS Class A and B ATH – September 2021

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: 26-Aug-21</p>	<p>Each services access interface not recorded for 16 of 79 metering installations metering installations certified since 1 February 2021.</p> <p>Metering installation type recorded incorrectly for 18 of 79 metering installations certified since 1 February 2021.</p> <p>All information regarding lower category certification not included in the certification report for one metering installation.</p> <p>Incorrect maximum interrogation cycle recorded in 41 of 79 metering installations certified since 1 February 2021.</p> <p>Maximum interrogation cycle not recorded for each services access interface in 17 of 79 metering installations since 1 February 2021.</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 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
Actions covered in following Non-compliances		31/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Ongoing QA activities and controls to ensure we maintain compliance in this area.		Ongoing
		Identified

Metering Installation Type																																					
Non-compliance		Description																																			
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7 From: 01-Feb-21 To: 26-Aug-21		Metering installation type recorded incorrectly for 18 of 79 metering installations. Each services access interface not recorded correctly for 16 of 79 metering installations. 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 as not all AMS processes have been updated to record each services access interface and installation type. There is no impact because the MEP normally determines the location of the services access interface and metering installation type; therefore, the audit risk rating is low.																																			
Actions taken to resolve the issue				Completion date	Remedial action status																																
As detailed below. Cat 1& 2 mass market implemented. Cat 2 – 4 TOU will be rolled out by mid-October. For Cat 1 and 2 Mass Market sites the following information will be included on the issued certifications. The example below is for an EDM I whole current meter. <table><tr><td>Interval:</td><td>HHR</td><td>NHH</td><td>HHR</td><td>NHH</td></tr><tr><td>Maximum Interrogation Cycle:</td><td>90</td><td>90</td><td>90</td><td>90</td></tr><tr><td>Service Access Point:</td><td>Remote</td><td>Remote</td><td>Local</td><td>Local</td></tr><tr><td>Condition:</td><td>Comm.</td><td>Comm.</td><td>No Comm.</td><td>No Comm.</td></tr></table> For Cat 2 - 4 TOU CT sites the following format will be used: <table><tr><td>Interval:</td><td>HHR</td><td>HHR</td></tr><tr><td>Maximum Interrogation Cycle:</td><td>30</td><td>30</td></tr><tr><td>Service Access Point:</td><td>Local</td><td>Local</td></tr><tr><td>Condition:</td><td>Comm.</td><td>No Comm.</td></tr></table> The MIC numbers are place holders as we are waiting for EDM I to respond with regards the technical information we have requested from them.				Interval:	HHR	NHH	HHR	NHH	Maximum Interrogation Cycle:	90	90	90	90	Service Access Point:	Remote	Remote	Local	Local	Condition:	Comm.	Comm.	No Comm.	No Comm.	Interval:	HHR	HHR	Maximum Interrogation Cycle:	30	30	Service Access Point:	Local	Local	Condition:	Comm.	No Comm.	31/10/2021	Identified
Interval:	HHR	NHH	HHR	NHH																																	
Maximum Interrogation Cycle:	90	90	90	90																																	
Service Access Point:	Remote	Remote	Local	Local																																	
Condition:	Comm.	Comm.	No Comm.	No Comm.																																	
Interval:	HHR	HHR																																			
Maximum Interrogation Cycle:	30	30																																			
Service Access Point:	Local	Local																																			
Condition:	Comm.	No Comm.																																			
Preventative actions taken to ensure no further issues will occur				Completion date																																	
Implementation of the meter interval classification documentation will be automated.				31/10/2021																																	

Services Access Interface		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 10 of Schedule 10.4 From: 01-Feb-21 To: 26-Aug-21	Each services access interface not recorded for 16 of 79 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 as not all AMS processes have been updated to record each services access interface. There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
As detailed in 3.2		31/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Implementation of the meter interval classification documentation will be automated.		31/10/2021
		Identified

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: 20-May-21</p> <p>To: 26-Aug-21</p>	<p>All information regarding lower category certification not included in the certification report for one metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong as the AMS process normally includes all required details.</p> <p>The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification is cancelled.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Certificate has been retracted due to the incorrect burdening identified in a subsequent non-compliance and the MEP informed and asked to arrange for recertification. The recertification will use Schedule 10.7 clause 6 Lower category of installation than the rating of the current transformers as the correct certification method and conditions for the MEP. Load profile has been confirmed to be <500A.		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
The issues with this particular job have been reviewed with all validators and they all showed a good understanding of the correct approach to be taken and what factors to be checked/requested. From our review this was an isolated incident. We are confident that the current processes and training should prevent further such mistakes occurring.		Completed	

Meter Requirements		
Non-compliance	Description	
<p>Audit Ref: 3.11</p> <p>With: Clause 26 (4) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 26-Aug-21</p>	<p>41 metering installation certification reports with maximum interrogation cycle incorrectly recorded.</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>There is very little impact on other participants; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>As detailed in 3.2</p> <p>This is an area where all industry participants have been inattentive and working to the status quo for several years.</p> <p>The new clarifications on the requirements for MIC has highlighted inconsistencies which are now being addressed.</p> <p>The MIC values supplied by other MEPs is under review.</p>		31/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Implementation of the meter interval classification documentation will be automated.		31/10/2021
		Identified

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 36(3) & (4) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 26-Aug-21</p>	<p>Maximum interrogation cycle not recorded for each services access interface in 17 metering installations.</p> <p>Potential impact: None</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>There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>As detailed in 3.2</p> <p>This is an area where all industry participants have been inattentive and working to the status quo for several years.</p> <p>The new clarifications on the requirements for MIC has highlighted inconsistencies which are now being addressed.</p> <p>The MIC values supplied by other MEPs is under review.</p>		31/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Implementation of the meter interval classification documentation will be automated.		31/10/2021
		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: 20-May-21</p> <p>To: 26-Aug-21</p>	<p>One category 2 metering installation certified with in-service burden lower than the burden range of the CTs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong because the AMS processes ensure certification is correctly applied in most cases.</p> <p>The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification needs to be cancelled.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>See below.</p> <p>Certificate has been retracted due to the incorrect burdening identified in a subsequent non-compliance and the MEP informed and asked to arrange for recertification. The recertification will use Schedule 10.7 clause 6 Lower category of installation than the rating of the current transformers as the correct certification method and conditions for the MEP. Load profile has been confirmed to be <500A.</p> <p>ICP 0006146333RND66 VC13203 (see 3.10)</p> <p>Cat3 to 2 1200/5 CTs done in May. Was a recertification after replacement of meter as comms fault for an existing downgrade certification, the validator missed the sizing of the CTs. CTS 1200/5 15VA SECURA CTs, burden range should be 3.75 to 15VA.</p> <p>Testing showed compliance with 5VA requirements. Also, the way the testing sheets are setup this non-standard type of CT was not available in the drop-down menu, so the tech used the closest type to get the correct ratio, which was a TWS model type.</p> <p>Current process is very rigorous and well understood by the field techs and validators. A reminder will be issued with regards the burdening requirements.</p> <p>The testing sheets have been updated to show the max and minimum burden requirements dependent on whether the CTS are exempt or not from burdening.</p> <p>"Allowed burden range is 25% to 100%" for non-exempt (TWS <500/5, all TWS multi-tap and all non-TWS CTs)</p> <p>"Allowed burden range is 0% to 100%" for exempt (TWS >500/5 single tap)</p>	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The issues with this particular job have been reviewed with all validators and they all showed a good understanding of the correct approach to be taken and what factors to be checked/requested. From our review this was an isolated incident. We are confident that the current processes and training should prevent further such mistakes occurring.</p>	Completed	

Certification as a Lower Category			
Non-compliance	Description		
Audit Ref: 5.5 With: Clause 6(1) Of Schedule 10.7 From: 20-May-21 To: 26-Aug-21	All information regarding lower category certification not included in the certification report for one metering installation. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong as the AMS process normally includes all required details. The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification is cancelled.		
Actions taken to resolve the issue		Completion date	Remedial action status
As detailed in 5.1		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
As detailed in 5.1		Completed	

Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1)(ii)(B) of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 26-Aug-21</p>	<p>ATH process does not ensure that minimum load requirement is always met for Category 1 raw meter data tests.</p> <p>ATH did not record the accumulation of pulses when conducting raw meter data tests.</p> <p>Meter register not incrementing when raw meter data tests conducted on Intellihub Elster gRex meters.</p> <p>Category 2 raw meter data test conducted with load of less than 10 amps on each phase for one metering installation.</p> <p>Prevailing load test not conducted during recertification of one category 1 metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 as the AMS process does ensure that testing is conducted but does not meet all of the requirements of the 1 February 2021 Code changes.</p> <p>The impact is low as the AMS process has ensured that testing has been conducted; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Remedial action status

<p><i>Mass Market</i></p> <p><i>Minimum requirements for the load used by techs.</i></p> <p>Training and procedures will be updated with the minimum requirements for Cat 1 and 2.</p> <p><i>The results of the pulse counting test must be recorded, Current measured, time and number of pulses. Result compared to Table 1.</i></p> <p>The current automated testing sheets for Cat 1 does not have the provision for recording the results, the changes on the meter display are recorded by photos. A new process will be introduced to capture these results and confirm compliance with the requirements of Table 1 of the code. It is expected this will be paper based initially and then implemented in the automated testing sheets.</p> <p>The current test process is also being reviewed and concerns around the requirements for using working standards will be raised with the EA.</p> <p><i>Test must be run long enough for register to increment for at least 1 least significant bit/mark. Current testing procedures being reviewed, in particular for incremental error considerations and appropriate changes made with follow on comms to Techs. This will be initiated in the field by the end of November.</i></p> <p>ICP0000718590TEEA0 VC12642</p> <p>3 phase meter with 5.8A, 16.2A and 11.0A, so not all phases were above 10A, This would have shown higher than 10A on average. Comms to techs will advise that all phases must exceed the minimum current requirements. This will be initiated in the field by the end of October. MEP will be informed to cancel the certification of this ICP.</p> <p>ICP1000024794BPA9D A1336379</p> <p>Cat 1, recertification after un-bridging, no prevailing load test with a working standard. This is an issue we will be raising with the Authority. MEP will be informed to cancel the certification of this ICP.</p>	<p>31/10/2021</p> <p>30/11/2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Retraining of field techs to ensure they are implementing the new code changes correctly. Routine QA checks to continue.</p> <p>More focus to be placed on future code amendments to ensure detailed impact assessments are undertaken.</p>	<p>Ongoing</p>	

Test Results		
Non-compliance	Description	
Audit Ref: 5.16 With: Clause 10(1) & (2) of Schedule 10.7 From: 20-May-21 To: 26-Aug-21	One category 2 metering installation certified with in-service burden lower than the burden range of the CTs. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the AMS processes ensure certification is correctly applied in most cases. The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification is cancelled.	
Actions taken to resolve the issue		Completion date
As detailed in 5.1		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As detailed in 5.1		Completed
		Remedial action status
		Cleared

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: 20-May-21</p> <p>To: 26-Aug-21</p>	<p>One category 2 metering installation certified with in-service burden lower than the burden range of the CTs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because the AMS processes ensure certification is correctly applied in most cases.</p> <p>The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification is cancelled.</p>	
Actions taken to resolve the issue		Completion date
As detailed in 5.1		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As detailed in 5.1		Completed
		Remedial action status
		Cleared

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 Of Schedule 10.7</p> <p>From: 20-May-21</p> <p>To: 26-Aug-21</p>	<p>One category 2 metering installation certified with in-service burden lower than the burden range of the CTs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because the AMS processes ensure certification is correctly applied in most cases.</p> <p>The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification is cancelled.</p>	
Actions taken to resolve the issue		Completion date
As detailed in 5.1		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As detailed in 5.1		Completed
		Cleared

Measuring Transformer Certification			
Non-compliance	Description		
<p>Audit Ref: 5.67</p> <p>With: Clause 3 of Schedule 10.8</p> <p>From: 01-Feb-21</p> <p>To: 26-Aug-21</p>	<p>Burden range not recorded in CT certification reports for 22 metering installations.</p> <p>Three 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: 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 that the controls are moderate as the AMS process to certify CTs during comparative recertification has been amended recently but has not updated its processes to record burden ranges.</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
<p>See details in 5.1</p> <p>ICP0000003259CP4CB</p> <p>ICP0241425263LCA2D</p> <p>ICP0282008594LCF10</p> <p>Cat 2 sites where the CTs were re-certified as part of comparative certification. Certifications deemed to be still current as the certification state of the CTs is not a requirement of compliance for the installation under Comparative certification.</p>		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>These sites were certified early 2021, there has been a lot of training and experienced gained since then by the validators and these issues have not been seen since. An additional technical memo will be released in early October to the field technicians to clarify and instruct on the appropriate application of comparative certification.</p>		31/10/2021	

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: 26-Aug-21</p>	<p>Burden range not recorded in CT certification reports for 22 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 that the controls are moderate as the AMS processes ensure that in-service burden is range is determined correctly but the range is not recorded in certification reports.</p> <p>There is no impact on settlement and participants as all CTs certified have in-service burden within the appropriate range; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
As detailed in 5.1 and 5.67		31/10/2021
Preventative actions taken to ensure no further issues will occur		Completion date
As noted in preceding non-compliances		31/10/2021
		Identified