

Compliance plan for VEMS – 2019

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-Mar-18</p> <p>To: 09-Mar-19</p>	<p>7 Category 2 metering installations certified with burden lower than 25% of the rated burden.</p> <p>4 Category 2 installations certified without register advance and prevailing load test results recorded.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</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 resolve 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 VEMS; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>VEMS disputes this non-compliance because all seven installations were certified under Schedule 10.7, clause 12 Comparative Recertification.</p> <p>Comparative Recertification does not allow the Current Transformers to be certified as a component, only the recertification of the installation as a whole. As such, VEMS has not recertified the Current Transformers on site. The requirement to ensure the in-service burden as per Clause 31(7) does not apply to clause 12.</p> <p>Additionally, the Memo issued by the Authority on the</p>		<p>Ongoing</p>
		<p>Disputed</p>

<p>4th April 2016 only refers to the requirement to ensure in-service burden level is at 25% if the Current Transformers are certified as a component, not as per the requirements to certify an installation.</p> <p>Therefore, based on our current understanding of clause 12, schedule 10.7, we believe the certifications of these seven Category 2 installations remain compliant.</p> <p>We look forward to the upcoming ATH/MEP forum to get clarification from the Authority and the industry on this issue.</p> <p>MEPs have been notified of the four installations that were certified without register advancement recorded in the commissioning documentation. These installations will be recertified as soon as possible.</p>	<p>30th April 2019</p>	<p>Post audit note.</p> <p>The Authority confirmed on 16/07/18 that certification does not apply if burden is lower than the lowest calibration point.</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Register Advance</p> <p>The two technicians who did not record register advancement have been retrained on the correct completion of documentation. A memo has been issued by VEMS to all CT metering technicians reminding them of this requirement.</p> <p>Burdening</p> <p>A new CT metering commissioning documentation is being developed by VEMS to allow technicians to easily identify sites requiring the addition of burdening resistors.</p> <p>Additionally, a memo will be issued further clarifying the requirements.</p>	<p>30th April 2019</p>	

Comparative Recertification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 12(3) And 12(5)(A) Of Schedule 10.7</p> <p>From: 01-Mar-18</p> <p>To: 09-Mar-19</p>	<p>4 Category 2 installations certified without register advance and prevailing load test results 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 in order to identify and resolve such situations.</p> <p>The impact on settlement and other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The four installations that were certified without register advancement recorded in the commissioning documentation will be recertified as soon as possible.		30 th April 2019
Preventative actions taken to ensure no further issues will occur		Completion date
The two technicians who did not record register advancement have been retrained on the correct completion of documentation A memo has been issued by VEMS to all CT metering technicians reminding them of this requirement.		30 th April 2019
		Identified

Fully Calibrated – Use Meter Class Accuracy		
Non-compliance	Description	
Audit Ref: 5.24 With: Clause 13(7) Of Schedule 10.7 From: 01-Mar-18 To: 28-Feb-19	Meter measured accuracy used instead of meter class accuracy for fully calibrated installations. Potential impact: None Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as strong because compliance is achieved with ISO 17025. There is no impact on settlement or other participants therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
VEMS requires further explanation from the Authority as to how compliance can be achieved in regard to this issue, so we can meet the requirement of ISO 17025.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
VEMS requires further explanation from the Authority as to how compliance can be achieved in regard to this issue, so we can meet the requirement of ISO 17025.		Ongoing
		Disputed

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 Of Schedule 10.7</p> <p>From: 01-Apr-18</p> <p>To: 28-Feb-19</p>	<p>VEMS has not confirmed the accuracy of non-TWS CTs when the in-service burden is lower than the lowest test point recorded in the IEC standard.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 5</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 resolve 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 VEMS; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>VEMS disputes this non-compliance because all seven installations were certified under Schedule 10.7, clause 12 Comparative Recertification.</p> <p>Comparative Recertification does not allow the Current Transformers to be certified as a component, only the recertification of the installation as a whole. As such, VEMS has not recertified the Current Transformers on site. The requirement to ensure the in-service burden as per Clause 31(7) does not apply to clause 12.</p> <p>Additionally, the Memo issued by the Authority on the 4th April 2016 only refers to the requirement to ensure in-service burden level is at 25% if the Current Transformers are certified as a component, not as per the requirements to certify an installation.</p> <p>Therefore, based on our current understanding of clause 12, schedule 10.7, we believe the certifications of these seven Category 2 installations remain compliant.</p> <p>We look forward to the upcoming ATH/MEP forum to get clarification from the EA and the industry on this issue.</p>		<p>Ongoing</p>
		Disputed

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A new CT metering commissioning documentation is being developed by VEMS to allow technicians to easily identify sites requiring the addition of burdening resistors. Additionally, a memo will be issued further clarifying the requirements.</p> <p>It should be noted that instruction has been issued by VEMS to the field regarding the burdening and the CTs and ICP 0000036540NT322. This was reviewed as part of this audit. Resistance was added to the CT circuit to increase the burden of the metering installation.</p>	30 th April 2019	

Provide Inspection Report to MEP		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 44(3) Of Schedule 10.7 From: 01-Mar-18 To: 09-Mar-19	7 inspection reports sent late. Potential impact: Low 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 there is room for improvement. The impact on MEPs is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
A new metering inspection form is being developed by VEMS to allow completed inspections to be processed through to the MEPs within the required timeframe.		30 th April 2019
Preventative actions taken to ensure no further issues will occur		Completion date
New work order reporting tools are being developed by VEMS to allow greater visibility of inspections work orders from issue to technicians through to being sent to the appropriate MEP.		Nov 2019

Testing 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: 01-Mar-18</p> <p>To: 28-Feb-19</p>	<p>MEP not notified that seven 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: Once</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 VEMS; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>VEMS disputes this non-compliance because all seven installations were certified under Schedule 10.7, clause 12 Comparative Recertification.</p> <p>Comparative Recertification does not allow the Current Transformers to be certified as a component, only the recertification of the installation as a whole. As such, VEMS has not recertified the Current Transformers on site. The requirement to ensure the in-service burden as per Clause 31(7) does not apply to clause 12.</p> <p>Additionally, the Memo issued by the Authority on the 4th April 2016 only refers to the requirement to ensure in-service burden level is at 25% if the Current Transformers are certified as a component, not as per the requirements to certify an installation.</p> <p>Therefore, based on our current understanding of clause 12, schedule 10.7, we believe the certifications of these seven Category 2 installations remain compliant.</p> <p>We look forward to the upcoming ATH/MEP forum to get clarification from the Authority and the industry on this issue.</p>		<p>Ongoing</p>
		Disputed

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A new CT metering commissioning documentation is being developed by VEMS to allow technicians to easily identify sites requiring the addition of burdening resistors. Additionally, a memo will be issued further clarifying the requirements.</p> <p>It should be noted that instruction has been issued by VEMS to the field regarding the burdening and the CTs and ICP 0000036540NT322. This was reviewed as part of this audit. Resistance has been added to the CT circuit to increase the burden of the metering installation.</p>	30 th April 2019	