

Compliance plan for Trustpower ATH – 2019

Metering Installation Type			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7 From: 07-May-18 To: 17-Dec-18	HHR/NHH field not populated for one ICP. Potential impact: Low Actual impact: Low Audit history: Once 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. There is very little impact on other participants, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Notified contractors to complete this field		13/8/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Advised processing staff to action immediately if breach is identified. We believe that the controls are high because every metering installation certification report is checked manually, and in this instance the registry was populated correctly even though the paperwork was not amended with a 'check' in an appropriate field. Also, this issue was identified and addressed before the audit even took place. These omissions are picked up and reported correctly to the registry, we believe that controls are strong and therefore this breach risk rating should be no more than a 1.		13/8/2018	

ATH Must Not Certify Metering Installations under Certain Circumstances		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 8(1) Of Schedule 10.7 From: 26-Feb-18 To: 07-Dec-18	Four metering installations certified despite not being compliant with Part 10. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because most certification activities achieve compliance. The impact on settlement and participants is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
1. Both new installations were remote rural with no power connected at the time and were certified soon after being livened - both were identified prior to the audit date. 2. CT Burden testing and recertification of these sites has been scheduled.		Completed Complete by 31 January 2019
Preventative actions taken to ensure no further issues will occur		Completion date
1. Contractors notified and advised to provide load tested and certified metering paperwork within 5 days of livening. 2. A process to deal with non-TWS CT installations is in place and a CT Metering Installation Certification Report for non-TWS CT installations has been created. 3. These 2 site certifications were initiated because of faulty meters not our compliance program. The gap in process between our retail initiated and MEP-compliance initiated work, has been addressed.		Completed

ATH Design Report Obligations		
Non-compliance	Description	
Audit Ref: 5.4 With: Clause 3 of Schedule 10.7 From: 26-Feb-18 To: 07-Dec-18	Design report not identified for 3 of 35 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	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Prior to the audit taking place, field contractors were reminded to complete this field on the meter-form and provided a web link to the design reports.		Completed 13/08/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Admin staff advised to identify these omissions on returned meter-form and action immediately		Completed 13/08/2018

Selected Component - Circumstances Where Method May Be Used		
Non-compliance	Description	
<p>Audit Ref: 5.18</p> <p>With: Clause 11(3) Of Schedule 10.7</p> <p>From: 06-Dec-17</p> <p>To: 07-Dec-18</p>	<p>21 certification reports where the register advance test was not conducted or was not recorded as being conducted.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak because they do not mitigate risk most of the time.</p> <p>The impact is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Prior to the audit, the new connections have been revisited and load checks completed. Meter readings had also validated register advancement.</p> <p>21 sites identified as no register advancement:</p> <p>At the time of our AMI Pilot we followed the process:</p> <ul style="list-style-type: none"> a) Meter was measuring Amps and Volts correctly and metrology of meter intact. b) Head-end validation used to confirm end to end data validation c) Post commissioning register readings to ensure Register advancement via back office. d) Comparison reports on average daily consumption pre versus post commissioning <p>We believe the controls were high as this process was, in our opinion, more thorough than that required by the EA. It utilised register advancements via back end data, ensuring accurate market settlement and customer billing.</p>		30/07/2018 Completed
		<p>Identified</p> <p>Post audit comment:</p> <p>The Authority's memo of 17/06/14 clarifies that the register advance test relates to the physical register, not the back-office register. It was the physical register advance test that was no conducted or recorded.</p>
Preventative actions taken to ensure no further issues will occur		Completion date

<p>Prior to the audit, Trustpower MEP added decimal points to registers to improve register advancement test capability on commissioning.</p> <p>Trustpower ATH has no future plans to complete AMI metering installations, as present and future AMI installation has been outsourced to IntelliHub and their field service providers. As a result, we believe no future risk rating should apply.</p>	<p>30/07/2018</p> <p>Completed</p>	
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Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 of Schedule 10.7</p> <p>From: 26-Feb-18</p> <p>To: 07-Dec-18</p>	<p>Two installations certified without consideration of low burden.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>There is a minor impact on settlement due to potential over recording and a minor impact on participants because certification is cancelled, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
CT Burden testing and recertification of these sites has been scheduled.		Complete by 31/01/2019
Preventative actions taken to ensure no further issues will occur		Completion date
A process to deal with non-TWS CT installations is in place and a CT Metering Installation Certification Report for non-TWS CT installations has been created.		Completed 14/12/2018