

Compliance plan for AMS MEP – 2022

MEP responsibility for services access interface		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 10.9(2)</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>NGCM</p> <p>Services access interface incorrectly recorded in the certification records for six of 70 metering installations sampled.</p> <p>AMCI</p> <p>Services access interface incorrectly recorded in the certification records for three metering installations and not recorded for one metering installation of 65 metering installations sampled.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</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 because the services access interface is still maintained in a compliant manner despite the incorrect recording in certification reports.</p> <p>There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering to remind its ATHs that all possible SAI must be stated in the certification and where there is non-compliance in the certification the ATH is to determine the root case. Also, in all circumstances they must correctly record the service access as either "remote" or "local".	31 January 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will implement an internal audit process to monitor inclusion of service access to ensure that it is either recoded as "remote" or "local" for all ICPs.	Ongoing	

Participants to Provide Accurate Information			
Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: Clause 11.2 and Clause 10.6</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>NGCM</p> <p>Some certification reports not complete and accurate.</p> <p>AMCI and NGCM</p> <p>Registry not always updated as soon as practicable.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are recorded as moderate because there is room to improve the timeliness of registry updates and the accuracy of certification records.</p> <p>The impact on other participants could be moderate due to the use of potentially incorrect data, thinking it is correct; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Vector Metering is considering current processes and the best way to ensure certification reports are complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion.		31 January 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Vector Metering will implement an internal audit process to monitor inclusion of certification reports to ensure they are complete and accurate and resolve issues that are identified and amended in a timely fashion.		31 March 2023	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Nov-21 To: 29-Jun-22	AMCI and NGCM Some registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are in place to ensure the timeliness of updates, but Vector Metering is often prevented from updating the registry due to late field notification. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering will review its process to determine what improvements can be made to current process, including if there is additional information the could be provided t in an effort to to promote prompt responses from other participants to minimise this matter, but recognise that to a fair extent this matter is outside its immediate control as it is caused by other participants.	16 December 2022 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will review its processes to determine what improvements can be made and communicate with other participants to remind them of their responsibilities.	28 February 2023 proposed	

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>NGCM and AMCI</p> <p>Some records updated to the registry later than 10 business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 in this area because there is room for improvement.</p> <p>Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>It is noted that significant improvements have been made over the years by NGCM on this matter. AMCI has recently made process changes requiring the operator to manually force change. Vector Metering will continue to monitor and look for further change that can be made to improve this matter, including the recent process change made by AMCI.</p>	<p>16 December 2022 proposed</p>	<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Vector Metering will remind its ATHs of the requirement to deliver accurate certification within the time requirements of the Code and ensure, when required, recertifications are provided as promptly as possible.</p>	<p>28 February 2023</p>	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Nov-21 To: 29-Jun-22	NGCM and AMCI Some inaccurate certification records. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate because instruction has been provided to ATHs, but there is further work to be done. There is a minor impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering requires to review this area and further reinforce with its ATHs this requirement and determine how this can be monitored and, where issues are identified, raised with its ATHs promptly.	31 January 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Remind ATHs of their obligation and Vector Metering implement a monitoring and reporting system, where issues are identified, with the applicable ATHs.	30 April 2023	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Nov-21 To: 29-Jun-22	AMCI 11 late MN files. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as AMCI has put reporting in place to identify nominations. The impact is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
For AMCI Vector Metering will monitor the success of the process that has been implemented and introduce changes as required.	2 December 2022 proposed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to monitor the success of its process changes on a regular basis to minimise the opportunity for this issue to reoccur.	28 February 2023 proposed	

Provision of Registry Information		
Non-compliance	Description	
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>NGCM and AMCI</p> <p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as moderate in this area. There are still a small number of areas where improvements can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering considers this to be an administrative issue and intend to review current process to identify opportunities for improvement for the small number, in particular, how amendments can be completed more quickly.	28 February 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implement improvements identified.	30 April 2023	

Correction of Errors in Registry		
Non-compliance	Description	
<p>Audit Ref: 6.3</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>NGCM and AMCI</p> <p>Discrepancies not resolved within five business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as moderate in this area. There are still a small number of areas where improvements can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Vector Metering intend to review current processes to identify opportunities for improvement, in particular, how amendments can be completed more quickly. However, we note that we are heavily reliant on other participants completing their activities before we can undertake amendments. Also, for AMCI consideration will be given to running the registry list file more frequently than every two weeks against Service Max as a means of minimising the extent of the issue and resolving more quickly.</p>	<p>28 February 2023 proposed</p>	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Implement opportunities where possible and look to reduce registry list file more frequently than every two weeks against Service Max</p>	<p>30 April 2023 proposed</p>	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>Certification cancelled, and registry not updated within 10 business days for:</p> <ul style="list-style-type: none"> - NGCM - three installations with low burden, - NGCM – 534 Category 2 installation with inspection not conducted, - NGCM - three ICPs where sum-check failures were not resolved within three business days, - AMCI - one installation with low burden, - AMCI - 32 installations with inspection not conducted, and - AMCI – one faulty metering installation. <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 in this area as there is room for improvement with missed inspections.</p> <p>The responsibility for the MEP is to cancel certification on the registry once they know certification is cancelled and the impact of not doing this is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Vector Metering will review its processes and look for opportunities for improvement.		31 March 2023 proposed
Preventative actions taken to ensure no further issues will occur		Completion date
Vector Metering will implement process changes identified to improve performance in this area.		30 May 2023 proposed
		Investigating

Certification and Maintenance		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7</p> <p>From: 12-Aug-14</p> <p>To: 29-Jun-22</p>	<p>NGCM</p> <p>Certification expired or cancelled for 32,914 NGCM metering installations.</p> <p>AMCI</p> <p>Certification expired for 359 AMCI metering installations.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as moderate in this area because certification has been expired for a number of years for some ICPs and because some of the expired installations were fully certified at one point.</p> <p>The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification. The audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering will look to correctly record ICPs status as quickly as possible and where possible recertify ICP. However, it is noted that there is a reliance on other participants, consumers, and resource availability to complete this work in a number of instances.	30 April 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to correct ICPs status and complete recertification when it is able	30 June 2023 proposed	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 01-Nov-21 To: 29-Jun-22	NGCM Some certification tests not conducted by ATHs. 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 main test not conducted is prevailing load using a working standard to recertify an installation with existing components. Other testing confirms the integrity of the installation, and the industry has the view that this test is not required. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering will remind its ATHs of the requirements and continue to monitor data and where required seek prompt remedial action.	30 November 2022 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to remind its ATHs of the requirements and continue to monitor data and where required seek prompt remedial action.	Ongoing	

Alternative Certification Requirements		
Non-compliance	Description	
<p>Audit Ref: 7.9</p> <p>With: Clauses 32(2), (3) and (4) of Schedule 10.7</p> <p>From: 28-Feb-22</p> <p>To: 21-Jun-22</p>	<p>AMCI</p> <p>Notification of alternative certification not provided to the Authority within 10 business days.</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 in this area because there is room for improvement.</p> <p>There is no impact on participants and settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering need to complete a review to understand the reasons why in 5 cases for AMCI the notification was not provided to the Authority within the required 10 business days. In addition, a review of the process to raise alternate certification will be completed. From this we can identify opportunities for improvement.	16 December 2022 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implement any opportunities for improvement identified.	Ongoing proposed	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Aug-21 To: 10-Apr-22	257 ICPs with time dependent meter registers with time that were not monitored every 12 months. 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 as NGCM has the capability to identify this, but regular monitoring has not taken place. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering has commenced reviewing how it deals with meters where the installation is non-communicating and there is a time dependent code with a view to ensuring a physical check within each 12 months, where required.	31 January 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Introduce process changes identified in the review, including need to monitor installations and completing a physical visit where required.	31 March 2023 proposed	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 29-Jun-22	NGCM 20,909 ICPs with expired interim certification. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate in this area because certification has been expired for a number of years for these ICPs. The impact on settlement is recorded as moderate because of the increased likelihood of failure or inaccuracy for metering installations with expired certification. The audit risk rating is recorded as medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering continues to actively work to reduce the number of interim certified ICPs that it has. However, it recognises that to achieve participation the cooperation of other participants and consumers is required, especially where remedial work is needed prior to certification activity taking place.	30 April 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to work to minimise interim certifies ICPs	On going	

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 31-Mar-21 To: 31-Dec-21	<p>NGCM and AMCI</p> <p>Incorrect date used to determine sample size for Category 1 sample inspections. Potential impact: Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have recorded the controls as strong as Vector Metering has updated its processes to ensure that the correct sample size will be selected in future inspections.</p> <p>There is no impact on other participants and on settlement as the correct number of inspections was completed. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering is now working to the requirements of the Code amendment made on 1 February 2021.	31 October 2022 proposed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ensure requirements of the Code are followed.	16 December 2022 proposed	

Category 2 to 5 Inspections		
Non-compliance	Description	
<p>Audit Ref: 8.2</p> <p>With: Clause 46(1) of Schedule 10.7</p> <p>From: 01-Nov-21</p> <p>To: 29-Jun-22</p>	<p>NGCM</p> <p>539 metering installations with inspection not conducted.</p> <p>AMCI</p> <p>32 Metering installations with inspection not conducted.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as moderate in this area for NGCM because reporting is in place but there is room for improvement. AMCI's inspection controls are rated as moderate because there is a regime in place and only a small number were outside the window.</p> <p>The issues found can potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering recognise that there are a number of issues that contribute to this issue, including access and filed resources. As a consequence of resource constraints Vector Metering made the decision to stop completing Inspection on the few remaining Cat 2 ICPs and instead focus resource on recertification.	31 October 2022 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to work to complete Inspections within the required timeframes and work with participants and its field services providers to minimise the number of overdue Inspections	Ongoing	

Timeframe for correct defects and inaccuracies		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 46A From: 01-Nov-21 To: 29-Jun-22	NGCM Remedial action not completed in required timeframe after notification of a faulty metering installation for nine ICPs. 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 as there is room for improvement. The impact on settlement and participants is minor based on the number of ICPs affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering will review its processes to determine what improvements can be made to meet the Code requirements. It is noted that due to the nature of the activities involved it is not always possible to achieve the defined timeline requirements as we are reliant on others.	28 February 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implement process improvements.	On going	

Meter bridging		
Non-compliance	Description	
Audit Ref: 9.5 With: Clause 10.33C From: 01-Nov-21 To: 29-Jun-22	NGCM Meters not reinstated after bridging within five business days of bridging for 22 Category 1 ICPs. 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 as there is room for improvement. The impact on settlement and participants is minor based on the number of ICPs affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering will review its processes to determine what improvements can be made to meet the Code requirements. It is noted that due to the nature of the activities involved it is not always possible to achieve the defined timeline requirements as we are reliant on others.	28 February 2023 proposed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implement identified process changes	30 May 2023 proposed	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Nov-21 To: 31-Aug-22	NGCM 1,164 examples of clock errors outside the allowable thresholds in the most recent reports. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Vector Metering will review its assets and systems to determine what opportunity there is for improvement.		31 March 2023 proposed
Preventative actions taken to ensure no further issues will occur		Completion date
Implement any identified process or asset improvements.		30 June 2023 proposed
		Investigating