

Compliance plan for Wells Instrument and Electrical Services Limited. Approved Test House October 2022

Provision of Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.2 With: Clause 10.6 of Part 10</p> <p>From: 01-May-22 To: 21-Oct-22</p>	<p>ICP 0005507369ML9D2 does not have all services access interfaces recorded.</p> <p>The certification reports for three ICPs had incorrect maximum interrogation cycles.</p> <p>Category 3 ICP 0000163211CK2A0 certified using the comparative method not the selected component method.</p> <p>The selected component certification method was recorded instead of the comparative method for seven of 20 metering installations checked.</p> <p>The "SET DEFAULT ANSWERS" section of certification reports is misleading.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate 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	Remedial action status
<p>Con-X V3 Job 3249311 for 0005507369ML9D2 was created using workflow Version 25.530 but the Services Access Interface labels were not added until Version 27.57 in mid 2021. This job was therefore created before the labels were added, hence why they do not appear in this job. There is nothing identified which can be done to remedy this job.</p>	<p>Completed</p>	<p>Investigating</p> <hr/> <p>Most issues are cleared. The issue still being investigated is the "SET DEFAULT ANSWERS" section of certification reports</p>

<p>Con-X V2 Jobs 5059870, 5061675, 5054743 for 0110003079ELFC1, 0007125733RN766, 0005447682RN12C were corrected to record the intended Maximum Interrogation Cycles</p> <p>Con-X V2 Job 5034563 for 0000163211CK2A0 was corrected to record Selected Component as the certification method</p> <p>Con-X V2 Jobs 4992563, 5056416, 4991347, 4992647, 5048295, 5051994, 5062073, 5062073 for 0079264786WEBBE, 0007205819RN2D4, 0006475191RN1E4, 0006008836RN41E, 0000025508WEB5B, 0001271871PC0ED, 0030064023PCE50 were corrected to record Comparative as the certification method</p> <p>There is nothing we can immediately do to change the SET DEFAULT ANSWERS section.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Completed</p>	
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>The range of applicable Services Access Interfaces are included in every current workflow so all jobs created since 4 August 2022 will include them</p> <p>Technician Reminder refresher training and improved Datachecking processes now in place should prevent further recurrences of similar mistakes.</p> <p>The documented processes will be clarified, updated and communicated to the techs at the earliest opportunity</p> <p>Technician Reminder refresher training and Improved Datachecking processes now in place should prevent further recurrences of similar mistakes.</p> <p>MEPs have been contacted to discuss this code requirement and to gain their agreement on a method of achieving full compliance. Additionally, we have initiated the exploration of options for modifying our workflows to enable communication on Lower Category Certification requirements between ourselves and the MEP.</p>	<p>Completed</p> <p>Completed</p> <p>30-11-22</p> <p>Completed</p> <p>30-11-22</p>	

Metering Installation Type			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 8(2) of Schedule 10.7</p> <p>From: 07-Sep-22</p> <p>To: 21-Oct-22</p>	<p>ICP 0005507369ML9D2 does not have all services access interfaces recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Three times</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 they reduce errors to an acceptable level.</p> <p>There is no impact because the services access interface list is not used or any purpose; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Con-X V3 Job 3249311 for 0005507369ML9D2 was created using workflow Version 25.530 but the Services Access Interface labels were not added until Version 27.57 in mid 2021. This job was therefore created before the labels were added, hence why they do not appear in this job. There is nothing identified which can be done to remedy this job.</p>		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The range of applicable Services Access Interfaces are included in every current workflow so all jobs created since 4 August 2022 will include them</p>		Completed	

Services Access Interface		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 10 of Schedule 10.4</p> <p>From: 07-Sep-22</p> <p>To: 21-Oct-22</p>	<p>ICP 0005507369ML9D2 does not have all services access interfaces recorded.</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 because they reduce errors to an acceptable level.</p> <p>There is no impact because the services access interface list is not used or any purpose; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Con-X V3 Job 3249311 for 0005507369ML9D2 was created using workflow Version 25.530 but the Services Access Interface labels were not added until Version 27.57 in mid 2021. This job was therefore created before the labels were added, hence why they do not appear in this job. There is nothing identified which can be done to remedy this job.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The range of applicable Services Access Interfaces are included in every current workflow so all jobs created since 4 August 2022 will include them</p>		Completed
Cleared		

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: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>All information regarding lower category certification not included in the certification reports for two metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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>If the MEP does not monitor load each month certification will be cancelled; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Whilst the MEP did not confirm their desire for Certification at a Lower Category or provide historic consumption data, they were advised via the job completion notes that they need to monitor the installation on that basis to ensure consumption limits are maintained.</p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>MEPs have been contacted to discuss this code requirement and to gain their agreement on a method of achieving full compliance. Additionally, we have initiated the exploration of options for modifying our workflows to enable communication on Lower Category Certification requirements between ourselves and the MEP.</p>	30-11-22	

Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 36(3) & (4) Of Schedule 10.7</p> <p>From: 01-Jul-22</p> <p>To: 30-Sep-22</p>	<p>Three incorrect maximum interrogation cycles.</p> <p>Potential impact: None</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>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>There is no impact because other parties do not rely on this field for any purpose.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Con-X V2 Jobs 5059870, 5061675, 5054743 for 0110003079ELFC1, 0007125733RN766, 0005447682RN12C were corrected to record the intended Maximum Interrogation Cycles</p>	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Technician Reminder refresher training and improved Datachecking processes now in place should prevent further recurrences of similar mistakes.</p>	Completed	

Determine Maximum Interrogation Cycle			
Non-compliance	Description		
Audit Ref: 3.14 With: Clause 36(3) & (4) Of Schedule 10.7 From: 01-Jul-22 To: 30-Sep-22	Three incorrect maximum interrogation cycles. Potential impact: None Actual impact: None 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 they mitigate risk to an acceptable level. There is no impact because other parties do not rely on this field for any purpose.		
Actions taken to resolve the issue		Completion date	Remedial action status
Con-X V2 Jobs 5059870, 5061675, 5054743 for 0110003079ELFC1, 0007125733RN766, 0005447682RN12C were corrected to record the intended Maximum Interrogation Cycles		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Technician Reminder refresher training and improved Datachecking processes now in place should prevent further recurrences of similar mistakes.		Completed	

Certification as a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 5.5</p> <p>With: Clause 6(1) of Schedule 10.7</p> <p>From: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>Two installations certified as a lower category despite the fact the MEP did not confirm the suitability of this certification based on historic data.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 Wells has engaged with MEPs to improve the notification processes.</p> <p>These installations require monitoring by the MEP and if the load is too high, recertification will occur, therefore the impact is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Whilst the MEP did not confirm their desire for Certification at a Lower Category or provide historic consumption data, they were advised via the job completion notes that they need to monitor the installation on that basis to ensure consumption limits are maintained.</p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>MEPs have been contacted to discuss this code requirement and to gain their agreement on a method of achieving full compliance. Additionally, we have initiated the exploration of options for modifying our workflows to enable communication on Lower Category Certification requirements between ourselves and the MEP.</p>	30-11-22	

Determining Metering Installation Category at a Lower Category Using Current Transformer Rating			
Non-compliance	Description		
<p>Audit Ref: 5.7</p> <p>With: Clause 6(2)(b) & (d) of Schedule 10.7</p> <p>From: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>Wells does not have sufficient information to determine certification as a lower category is appropriate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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 relevant ICPs are identified and MEPs have been consulted about changes to the process to enable compliance. These discussions are on-going.</p> <p>The impact could be that the CTs become overloaded if the demand is not monitored or the consumption could exceed the required thresholds, meaning more accurate metering and HHR settlement is required.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Whilst the MEP did not confirm their desire for Certification at a Lower category, they were advised via the job completion notes that they need to monitor the installation on that basis to ensure consumption limits are maintained.</p>		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>MEPs have been contacted to discuss this code requirement and to gain their agreement on a method of achieving full compliance. Additionally, we have initiated the exploration of options for modifying our workflows to enable communication on Lower Category Certification requirements between ourselves and the MEP.</p>		30-11-22	

Use of Metering Installation Certification Methods		
Non-compliance	Description	
Audit Ref: 5.9 With: Clause 7(1) Of Schedule 10.7 From: 25-Feb-22 To: 21-Oct-22	Category 3 ICP 0000163211CK2A0 certified using the comparative method not the selected component method. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	At the time of the audit the controls required improvement. The process is documented, but I have recommended improvements to ensure future Category 3 installations are certified using the selected component method. The impact is that the certification was extended without CT calibration.	
Actions taken to resolve the issue	Completion date	Remedial action status
Con-X V2 Job 5034563 for 0000163211CK2A0 was corrected to record Selected Component as the certification method	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The documented processes will be clarified, updated and communicated to the techs before the end of November	30-11-22	

Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1) of Schedule 10.7</p> <p>From: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>At least four Category 1 metering installations recertified without a prevailing load test.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: Twice</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 they mitigate risk to an acceptable level.</p> <p>There is no impact of not doing a prevailing load test, because raw meter data output tests are conducted.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Acknowledged but disputed due to industry acknowledged code error	-	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As discussed, the EA have been contacted regarding this apparent error. MEPs have been contacted and all agree that there is an error and that they do not require Wells ATH to perform a Prevailing Load Test in these circumstances	-	

Selected Component - Circumstances where method may be used		
Non-compliance	Description	
<p>Audit Ref: 5.18</p> <p>With: Clause 11(4) of Schedule 10.7</p> <p>From: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>Calibration not conducted when CTs certified for two Category 2 metering installations certified using the selected component method.</p> <p>Meters certified without calibration for at least three Category 1 installations recertified with existing meters.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 certification tests are completed in most cases.</p> <p>The impact is likely to be low as certification tests had been carried out on the meters during previous certifications; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Con-X V2 Jobs 4992563 for 0079264786WEBBE and 5056416 for 0007205819RN2D4 were corrected to record that the CTs were not certified. No CT Device Certification stickers had been applied.</p> <p>Con-X V2 Jobs 5059156 for 0005737940RNF44, 5064280 for 0000030850WEB8E, 5065155 for 0000025248TR065 were corrected to record the previous meter certification dates.</p> <p>Meter Certification Stickers must be reinstated on site as 2-10-08, 12/03/2014, 17/08/2010 respectively.</p>	<p>Completed</p> <p>Completed</p> <p>30-11-22</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Refresher training has been initiated via our weekly Metering Reminder communique to clarify the CT Device Certification conditions and requirements.	Completed	
Refresher training has been initiated to clarify the Meter Device Certification conditions and requirements.	Completed	

Requirement for Calibration of Metering Components		
Non-compliance	Description	
<p>Audit Ref: 5.59</p> <p>With: Clause 7(2) Of Schedule 10.4</p> <p>From: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>Two sets of CTs certified without calibration.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is low because prevailing load tests were conducted, and the installations are confirmed to be recording accurately.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Con-X V2 Jobs 4992563 for 0079264786WEBBE and 5056416 for 0007205819RN2D4 were corrected to record that the CTs were not certified. No CT Device Certification stickers had been applied.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Refresher training has been initiated via our weekly Metering Reminder communique to clarify the CT Device Certification conditions and requirements.	Completed	

Measuring Transformer Certification		
Non-compliance	Description	
<p>Audit Ref: 5.67</p> <p>With: Clause 3 of Schedule 10.8</p> <p>From: 01-May-22</p> <p>To: 21-Oct-22</p>	<p>Two 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: Three times</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 impact is low because prevailing load tests were conducted, and the installations are confirmed to be recording accurately.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Con-X V2 Jobs 4992563 for 0079264786WEBBE and 5056416 for 0007205819RN2D4 were corrected to record that the CTs were not certified. No CT Device Certification stickers had been applied.</p>	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Refresher training has been initiated via our weekly Metering Reminder communique to clarify the CT Device Certification conditions and requirements.</p>	Completed	