

Compliance Plan for AMS Class A and B ATH – 2022

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: 29-Jul-22</p>	<p>Each services access interface not recorded correctly in six of 76 metering installation certification reports.</p> <p>Metering installation type recorded incorrectly in six of 76 metering installation certification reports.</p> <p>Incorrect maximum interrogation cycle recorded in 44 of 76 metering installation certification reports.</p> <p>Maximum interrogation cycle not recorded for each services access interface in six of 76 metering installation certification reports.</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	Remedial action status
No action required for certificates supplied to Auditor. Confirmed correct information supplied to MEP and registry via automated systems, issue is with certificate generation.	N/A	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Identified as a shortfall of the automated certificate generation process not recognizing non-AMI meters, as the process is optimized for AMI meters. Investigation underway to determine best approach to identify and correct future generated certificates.</p> <p>Joint investigation with Vector Metering MEPs to review and agree on appropriate MIC for various meter types.</p>	TBC	

Metering Installation Type			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 8(2) of Schedule 10.7</p> <p>From: 01-Sep-21</p> <p>To: 29-Jul-22</p>	<p>Metering installation type recorded incorrectly for six of 76 metering installations.</p> <p>Each services access interface not recorded correctly for six of 76 metering installations.</p> <p>Potential impact: Low</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 as not all AMS processes have been updated to correctly record each services access interface and installation type.</p> <p>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.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
No action required for certificates supplied to Auditor. Confirmed correct information supplied to MEP and registry via automated systems, issue is with certificate generation.		N/A	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Identified as a shortfall of the automated certificate generation process not recognizing non-AMI meters, as the process is optimized for AMI meters. Investigation underway to determine best approach to identify and correct future generated certificates.		TBC	

Services Access Interface		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 10 of Schedule 10.4</p> <p>From: 01-Sep-21</p> <p>To: 29-Jul-22</p>	<p>Each services access interface not recorded correctly for six of 76 metering installations.</p> <p>Potential impact: Low</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 as not all AMS processes have been updated to correctly record each services access interface.</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
No action required for certificates supplied to Auditor. Confirmed correct information supplied to MEP and registry via automated systems, issue is with certificate generation.	N/A	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Identified as a shortfall of the automated certificate generation process not recognizing non-AMI meters, as the process is optimized for AMI meters. Investigation underway to determine best approach to identify and correct future generated certificates.	TBC	

Meter Requirements		
Non-compliance	Description	
<p>Audit Ref: 3.11</p> <p>With: Clause 26 (4) of Schedule 10.7</p> <p>From: 01-Sep-21</p> <p>To: 29-Jul-22</p>	<p>44 metering installation certification reports with maximum interrogation cycle incorrectly recorded.</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 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>NGCM – similar automated report generation issue as 3.2, and same action.</p> <p>MTRX – issue with discrepancy between ATH design report and new MTRX design report (not signed off by ATH as awaiting explanation response from MEP with regards how the MIC was determined).</p> <p>AMCI – 30 is the current agreed MIC for CT metering, the 200 listed in the Registry is a result of the MEPs automated systems. The MEP has been informed.</p>		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
<p>NGCM – same action as 3.2 for identifying non-smart meters.</p> <p>MTRX – No further work will be undertaken for MTRX from 10 October 2022. No further actions undertaken.</p> <p>AMCI – see 3.14</p>		TBC
Remedial action status		
Investigating		

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 36(3) & (4) of Schedule 10.7 From: 01-Sep-21 To: 29-Jul-22	Maximum interrogation cycle not recorded for each services access interface in six metering installations. Potential impact: None Actual impact: None 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 there is room for improvement. There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
See 3.2		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
See 3.2		TBC
		Investigating

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: 29-Jul-22</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>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	Completion date	Remedial action status
The Raw data load test process for Cat 1 is currently under review along with its training material. This will include guidance on load sizes and expected time frames to achieve register increment (pulse or advance) and the recording of these results.	February 2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implementation of the test process and subsequent training and auditing to resolve the current problem and monitor compliance with the new process.	February 2023	