

Compliance Plan for Influx Class B ATH – April 2023

Provision of Accurate Information		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 10.6 of Part 10 From: 30-Jun-22 To: 16-Mar-23	Incorrect or missing information in some certification reports. Potential impact: Low Actual impact: Low Audit history: Twice 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. Certification was carried out correctly, therefore the impact is considered low.	
Actions taken to resolve the issue	Completion date	Remedial action status

<ul style="list-style-type: none"> • two metering installations did not have all types, services access interfaces and maximum interrogation cycles recorded, (sections 3.2, 3.5 and 3.14), <ul style="list-style-type: none"> ○ 0000514045NRCOA certification was completed on an old form (FCL Metering – AMI). All certifications going forward are completed on “Influx Metering Work” within our field capture tool which has both SAI’s for HHR and NHH for AMI meters ○ 0000007142TCBDO certification was completed on paperwork that is no longer accepted. All contractors have been advised of this as well as this has been passed on internally. • incorrect calibration laboratory recorded on meter certification stickers for four metering installations, (section 4.14), <ul style="list-style-type: none"> ○ Correspondence was sent out to contractors regarding recording the correct calibration laboratory along with examples of calibration stickers • control device details not recorded in metering installation certification report for ICP 0000514045NRCOA, and <ul style="list-style-type: none"> ○ Training within contractors and staff • Incorrect certification period of seven years applied to 6,104 ICPs certified using the statistical recertification method. <ul style="list-style-type: none"> ○ Identified and under investigation 	<p>March 2023</p>	<p>Cleared</p>
<p align="center">Preventative actions taken to ensure no further issues will occur</p>	<p align="center">Completion date</p>	
<p>Update to certification forms completed prior to audit, training and process change</p>	<p>March 2023</p>	

Metering Installation Type		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7 From: 30-Jun-22 To: 16-Mar-23	All installation types and services access interfaces not recorded for two installations. Potential impact: None Actual impact: None Audit history: Twice 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 the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<ul style="list-style-type: none"> ○ 0000514045NRCOA certification was completed on an old form (FCL Metering – AMI). All certifications going forward are completed on “Influx Metering Work” within our field capture tool which has both SAI’s for HHR and NHH for AMI meters ○ 0000007142TCBDO certification was completed on paperwork that is no longer accepted. All contractors have been advised of this as well as this has been passed on internally. 	March 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Update to certification forms completed prior to audit,	March 2023	

Services Access Interface		
Non-compliance	Description	
Audit Ref: 3.5 With: Clause 10 of Schedule 10.4 From: 30-Jun-22 To: 16-Mar-23	All services access interfaces not recorded for two installations. Potential impact: None Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as Influx have made changes to its process to record each services access interface and maximum interrogation cycle. There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<ul style="list-style-type: none"> ○ 0000514045NRCOA certification was completed on an old form (FCL Metering – AMI). All certifications going forward are completed on “Influx Metering Work” within our field capture tool which has both SAI’s for HHR and NHH for AMI meters ○ 0000007142TCBDO certification was completed on paperwork that is no longer accepted. All contractors have been advised of this as well as this has been passed on internally. 	March 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Update to certification forms completed prior to audit,	March 2023	

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 36(3) & (4) of Schedule 10.7 From: 30-Jun-22 To: 16-Mar-23	Maximum interrogation cycle not recorded for each services access interface in two metering installations. 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 as Influx have made changes to its process to record each services access interface and maximum interrogation cycle. 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	Remedial action status
<ul style="list-style-type: none"> ○ 0000514045NRCOA certification was completed on an old form (FCL Metering – AMI). All certifications going forward are completed on “Influx Metering Work” within our field capture tool which has both SAI’s for HHR and NHH for AMI meters ○ 0000007142TCBDO certification was completed on paperwork that is no longer accepted. All contractors have been advised of this as well as this has been passed on internally. 	March 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Update to certification forms completed prior to audit,	March 2023	

Metering Component Stickers		
Non-compliance	Description	
Audit Ref: 4.14 With: Clause 8(2) of Schedule 10.8 From: 15-Aug-22 To: 18-Nov-22	Incorrect calibration laboratory recorded on metering component sticker for four metering 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 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
<ul style="list-style-type: none"> ○ Correspondence was sent out to contractors regarding recording the correct calibration laboratory along with examples of calibration stickers. 	April 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training and communication with contractors	April 2023	

Certification Tests		
Non-compliance	Description	
Audit Ref: 5.12 With: Clause 9(1)(ii)(B) of Schedule 10.7 From: 01-Feb-21 To: 16-Mar-23	Minimum load requirement for raw meter data test on Category 2 meter not met for one metering installation. ATH did not measure the load applied and when conducting a raw meter data test for all 33 Category 1 metering installations checked. 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 they mitigate risk most of the time but there is room for improvement. The impact is minor because testing is conducted therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status

<ul style="list-style-type: none"> ○ This Category 2 site was completed during a training session with the ATH Technical Specialist. The code clearly states in Clause 9(1)c of Schedule 10.7 that the site only requires a minimum of 10 amps during the raw meter data output test. The photo taken on site clearly shows that the current was above 10 amps (11, 14 and 11A) during the raw meter data output. This will not be an issue in future as the average load during the raw meter data output test is recorded in the new certification paperwork, however Influx would like to raise an issue of the auditor using the secondary current for the burden test as an indication for the primary load as the code does not require the primary (or secondary current for that matter) to be greater than a set point for burden measurements. ○ Influx has submitted a code change application to the EA for category 1 load testing while conducting raw meter data tests. 	N/A	Cleared
<p style="text-align: center;">Preventative actions taken to ensure no further issues will occur</p>	TBC	Investigating
<p>No preventative actions required, however new certification paperwork records the average load during the raw data output meter test.</p>	N/A	

Statistical Sampling		
Non-compliance	Description	
Audit Ref: 5.26 With: Clause 16 of Schedule 10.7 From: 07-Sep-22 To: 16-Mar-23	Incorrect certification period of seven years applied to 6,104 ICPs certified using the statistical recertification method. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as the statistical sampling process used is robust apart from the determination of the certification period. There is likely to be no impact as the meters used are of a higher class than required by the Code for use in Category 1 metering installations and the calibration results have confirmed their accuracy. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
In discussion with the Electricity Authority regarding the certification validity periods	TBA	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Awaiting further discussions with the Electricity Authority	TBA	

Certification Validity Periods		
Non-compliance	Description	
Audit Ref: 5.28 With: Clause 17 of Schedule 10.7 From: 07-Sep-22 To: 16-Mar-23	Incorrect certification period of seven years applied to 6,104 ICPs certified using the statistical recertification method. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have rated the controls as moderate as the statistical sampling process used is robust apart from the determination of the certification period. There is likely to be no impact as the meters used are of a higher class than required by the Code for use in Category 1 metering installations and the calibration results have confirmed their accuracy. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
In discussion with the Electricity Authority regarding the certification validity periods	TBA	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Awaiting further discussions with the Electricity Authority	TBA	

Measuring Transformers Used in a Certified Metering Installation		
Non-compliance	Description	
Audit Ref: 5.37 With: Clause 28(4) Of Schedule 10.7 From: 06-Sep-22 To: 16-Mar-23	One metering installation certified with CTs burden lower than the lowest burden test point specified in the standard without confirmation from the CT manufacturer. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong as the Influx process ensures that burden resistors are added when required, and this model of CT has been added to its list of CTs requiring burden to be added. The impact on the accuracy of the metering installation is low therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
<ul style="list-style-type: none"> The site in question (000530401NRCE9) had its certification cancelled and the MEP notified on 23/03/2023. A Work Order was raised, and a contractor attended site and rectified the burden on 30/03/2023 (certification can be provided if required). Influx request that the points regarding this are removed from the overall tally or at least considered with respect to the next audit frequency. 	April 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Updates to certification paperwork as well as correspondence with contractors	April 2023	

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 of Schedule 10.7</p> <p>From: 06-Sep-22</p> <p>To: 16-Mar-23</p>	<p>One metering installation certified with CTs burden lower than the lowest burden test point specified in the standard without confirmation from the CT manufacturer.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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 as the Influx process ensures that burden resistors are added when required, and this model of CT has been added to its list of CTs requiring burden to be added.</p> <p>The impact on the accuracy of the metering installation is low therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<ul style="list-style-type: none"> The site in question (000530401NRCE9) had its certification cancelled and the MEP notified on 23/03/2023. A Work Order was raised, and a contractor attended site and rectified the burden on 30/03/2023 (certification can be provided if required). Influx request that the points regarding this are removed from the overall tally or at least considered with respect to the next audit frequency. 	April 2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Updates to certification paperwork as well as correspondence with contractors	April 2023	

Measuring Transformer Certification		
Non-compliance	Description	
Audit Ref: 5.67 With: Clause 3 of Schedule 10.8 From: 01-Apr-21 To: 04-Nov-22	Burden range is not sufficiently clear when CTs are certified. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong as the ATH process now records burden range correctly. 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
<ul style="list-style-type: none"> As per the audit correspondence, Influx have updated our Category 2 Installation Report to clearly specify the burden range on a CT by CT basis. We would request that the points associated with this be removed from the overall tally or at least considered with respect to the next audit frequency. 	September 2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Nil	N/A	

Measuring Transformers in service burden range		
Non-compliance	Description	
Audit Ref: 5.68 With: Clause 2(1)(E) Of Schedule 10.8 From: 01-Apr-21 To: 04-Nov-22	Burden range is not sufficiently clear when CTs are certified. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong as the ATH process now records burden range correctly. 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
<ul style="list-style-type: none"> As per the audit correspondence, Influx have updated our Category 2 Installation Report to clearly specify the burden range on a CT by CT basis. We would request that the points associated with this be removed from the overall tally or at least considered with respect to the next audit frequency. 	September 2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Nil	N/A	

All Functions and Activities must be completed		
Non-compliance	Description	
Audit Ref: 5.76 With: Clause 10.42(1) From: 19-Oct-22 To: 16-Mar-23	Certification not conducted after modification of a metering installation. 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 they mitigate risk most of the time but there is room for improvement. 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
Influx will look to update our process so that when certifying an installation with a load control device, a ripple load control device will be installed.	April 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training and discussions with owners of load control devices.	April 2023	