

## Compliance plan for Counties MEP 2023

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 01-Jan-22 To: 30-Nov-22	Each services access interface not identified for 26 metering installations. Potential impact: Low Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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. 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
Both the service access interfaces will be displayed when the new installation report format is applied	Proposed date August 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The revision to the field tool application will enforce service access interface data capture	Proposed date August 2023	

<b>Participants to Provide Accurate Information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Jan-22 To: 30-Nov-22	Some information is incorrect, as recorded in Sections 5.1, 6.2 and 6.4 Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are recorded as moderate because there is room to improve processes. The impact on other participants is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Noted as a percentage of all fields uploaded, there are some data errors published on Registry		Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	Completion date	
Ongoing staff training and logic rules applied to the data entry continues to improve the error rates		

Registry Notification of Metering Records		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-Jan-21</p> <p>To: 30-Nov-22</p>	<p>6 registry updates later than 15 business days.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are in place to ensure the timeliness of updates, but Counties is often prevented from updating the registry due to not being nominated at the time of the metering installation.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Typically, the aim is for next day turn around of completed jobs to Registry update, and usually any delay is due to delay in submission of certification report or similar. However, the administration team has been reminded of the requirement to upload of Registry data withing 10 business days of connection of an ICP. We also must point out Traders continue to issue COUP metering jobs prior to nominating MEP Status and also prior to accepting responsibility for the ICP on Registry. We have no direct control on these Participants, so if they are non-compliant this rolls through to compliance for COUP</p>		
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Also: There are multiple scenarios where data cannot be directly loaded to registry due to conflicts with other participants data or dates etc in some cases requiring manual actions or requests for reversals etc. However regardless all efforts will continue be made to meet the targets.</p>		
Remedial action status		
Unknown		

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: 2 of Schedule 10.7 From: 01-Jan-22 To: 17-Feb-23	Maximum interrogation cycle for each services access interface not recorded in design reports. Design report not recorded for three installations certified by VCOM Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Strong controls are in place because Counties is preparing a new standard design report which includes all required information. There is little impact because the installations are compliant despite the incorrect design reports.	
Actions taken to resolve the issue	Completion date	Remedial action status
Noted. Amendments to design reports will state both interrogation cycles.	March 2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	Completion date	
A field app update will ensure the design report reference is populated on the metering installation records	August 2023	

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-Jan-21</p> <p>To: 30-Nov-22</p>	<p>Some records updated on 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	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room to improve and shorten the notification process for updates.</p> <p>The late updates for new connections occurred after the trader had populated their records, therefore the impact on participants, customers or settlement is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>The administration team has been reminded of the requirement to upload of Registry data within 10 business days of connection of an ICP. We however must point out Traders continue to issue COUP metering jobs prior to nominating MEP Status and also prior to accepting responsibility for the ICP on Registry. We have no direct control on these Participants, so if they are non-compliant this rolls through to compliance for COUP</p>		Identified
<p>Preventative actions taken to ensure no further issues will occur</p>		
<p>Also: There are multiple scenarios where data cannot be directly loaded to registry due to conflicts with other participants data or dates etc in some cases requiring manual actions or requests for reversals etc. However regardless ongoing efforts will continue be made to meet the targets.</p>		

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Jan-22 To: 30-Nov-22	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	
<b>Low</b>	I have recorded the controls as moderate because there is room for improvement.  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
A project that includes altering output report format template is already underway.	August 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once the new template is implemented the system will ensure all metering assets with status are correctly indicated on the report.		

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Jan-22 To: 30-Nov-22	Some registry records are incomplete or incorrect. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made. Very few of the discrepancies have an impact on participants, customers or settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Noted miscellaneous updates to implement.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
A memo highlighting these anomalies will be sent to the administration team.		

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Jan-22</p> <p>To: 31-Dec-22</p>	<p>Certification not cancelled within 10 business days on the registry for:</p> <ul style="list-style-type: none"> <li>- One metering installation where the inspection was not completed,</li> <li>- Two metering installations where low burden is present, and</li> <li>- One ICP with failed sum-check.</li> </ul> <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	
<b>Low</b>	<p>I have recorded the controls as moderate as there is room for improvement.</p> <p>The installations with low burden are both recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for Counties 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	Remedial action status
<p>Jobs to recertify the two ICPs with arguable certification status / burden measurements recorded or identified were reissued and second visits completed. However, we are still trying to interpret the documentation and anomalies within it, as the text advises burdens measure ok however the original metering certification number remains unchanged etc, so we are following up for clarification.</p> <p>Regardless careful review of new CT metering installation certificates to check for these measurements will be made.</p>		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The audit has picked up some non-compliance around sum-checks and AMI flag status updates that are predating systems and processes now already implemented.</p>		



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: 01-Jan-22</p> <p>To: 14-Feb-23</p>	<p>Certification expired for:</p> <ul style="list-style-type: none"> <li>- 339 previously interim certified category 1 ICPs,</li> <li>- 120 category 1 ICPs,</li> </ul> <p>Certification cancelled for four 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	
<b>Medium</b>	<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, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
A continuing program of work to address and recertify the small numbers remnant category 1 ICP with expired certification is in place.]		
Preventative actions taken to ensure no further issues will occur		Completion date
[Letters have been sent to the associated Retailers requesting they engage with the customers at the ICPs with expired metering to provide access or undertake the remedial actions required.		February 2023
Remedial action status		
Identified		

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b)  From: 04-Oct-22 To: 04-Oct-22	Prevailing load test not conducted for one category 1 metering installation.  Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because a raw meter data output test was conducted, which confirms the correct operation of the metering installation.  The impact is low as the accuracy of the metering installation is unlikely to have been impacted by the prevailing load test not being completed, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Unfortunately, the requirements of the code on this occasion were impractical whilst the technician was conducting the work at a hostile customers property following up from a theft of power scenario.  In this situation the technician was satisfied the bridge was external only and was opinion, the accuracy and continued integrity of the meter was unaffected.		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Control Device Bridged Out		
Non-compliance	Description	
Audit Ref: 7.11 With: Clause 35 of Schedule 10.7 From: 27-Sep-22 To: 15-Feb-23	Reconciliation participant not notified of two bridged control devices. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
Actions will be taken to ensure the Retailer knows a control device has been bridged		
Preventative actions taken to ensure no further issues will occur		Completion date
Review of the inspections carried out in the field and corrective actions are to be carried out more promptly. In one example of the retailer response to notification of a bridged load control: The Retailer simply requested reinstatement of the load control <u>without</u> any discussion with the customer. On our discussion with the customer it was established in fact the customer desired to switch to an uncontrolled tariff.		
		Cleared

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 14-Feb-23	339 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	
<b>Medium</b>	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, therefore the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
Per previous commentary we have requested assistance of the Retailer to help ultimately resolve the ICP remaining in operation with non-compliant metering installations.		
Preventative actions taken to ensure no further issues will occur		Completion date
We would suggest the customer or property owner has some obligations and these also be included somehow with the regulations.		
		Identified

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 09-Oct-22 To: 16-Nov-22	Inspection not conducted for one installation. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The missed inspection is already recertified, we would point out resources in the field of Approved Test Houses is severely constrained, and access into customers property is not always as straightforward as those outside the industry would likely expect.		Identified
Preventative actions taken to ensure no further issues will occur		Completion date
Inspection Jobs are issued at least 3 months in advance of expiry.		

Timeframe for correct defects and inaccuracies		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 10.46A  From: 09-Oct-22 To: 16-Nov-22	Remedial actions not undertaken within the required timeframe for three ICPs where sumcheck failures occurred.  Potential impact: Medium  Actual impact: Low  Audit history: None  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level.  The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The 10 day timeframe prescribed in the code is impractical and we cannot always access the metering installation within a customers property at short notice.		
Preventative actions taken to ensure no further issues will occur		Completion date
Often these meter changes are an unnecessary inconvenience to the customer. We could in many cases resolve the sumcheck issue via over the air update and correction, but the code prohibits this.		
		Investigating

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 02-Dec-22 To: 02-Dec-22	46 examples of clock errors outside the allowable thresholds in the 2 December 2022 report. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as strong because clocks are synchronised during every successful interrogation. The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
No comment		Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
No comment		