

## Compliance Plan for Influx MEP – 2023

<b>MEP responsibility for services access interface</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.1 With: Clause 10.9(2)  From: 01-Mar-22 To: 08-Nov-22	Services access interface not recorded in certification records for nine metering installations. Potential impact: Low Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as moderate because there is room for improvement. There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Follow up with ATHs ATHs identified have resolved as per there Audits.	13/04/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Monitor Certs	On Going	

<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-Mar-22 To: 08-Nov-22	Registry not always updated as soon as practicable in some cases. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as moderate because there is room for improvement. 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>
These are mainly due to cancellation identified in the Audit due to technical issues and have been updated. Followed up ATHs on cancellation issues and confirmed majority have been from Omnibus changes and issues have now been resolved.	01/05/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Cat 2 + certs now checked by Compliance Team before processed by CER team. Improvements in reporting to capture non-compliance 01/08/2023	Ongoing	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Mar-22 To: 08-Nov-22	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	
<b>Low</b>	Controls are in place to ensure the timeliness of updates, but Influx is often prevented from updating the registry due to late nomination by traders or 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
Identify reasons why Largely due to Late Retailer Nomination , Late ATH paperwork, Other MEP Events on the Registry ( AMI Y/N) preventing update	30/04/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Work with participants to improve. Discuss with EA on other MEP event dates now causing issues due to AMI Y/N as per Omnibus change requirements.	Ongoing	

<b>Metering Installation Design &amp; Accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7  From: 01-Mar-22 To: 08-Nov-22	Design report not recorded for nine metering installations. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are recorded as strong because processes are in place to ensure that correct design reports are used. 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>
Follow up with ATHs ATHs identified have resolved as per there Audits.	13/04/2023	Cleared
Preventative actions taken to ensure no further issues will occur	<b>Completion date</b>	
Monitor Certs	Ongoing	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Mar-22 To: 08-Nov-22	Some records updated on the registry later than ten business days. Potential impact: Low 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 they reduce risk most of the time but there is still room for improvement, especially with new connection updates. 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.	
Actions taken to resolve the issue	Completion date	Remedial action status
Identify reasons Why Largely due to Late Retailer Nomination , Late ATH paperwork,	30/04/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Work with participants to improve processes	Ongoing	

<b>Accurate and Complete Records</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Mar-22 To: 08-Nov-22	Some inaccurate or incomplete certification records. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<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.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Follow up with ATHs ATHs identified have resolved most of the issues mainly related to Omnibus Changes.	30/04/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Monitor Certs	Ongoing	

<b>MEP Response to Switch Notification</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Mar-22 To: 08-Nov-22	40 late MN files. Potential impact: Low Actual impact: None Audit history: Three times Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level. There was no impact; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Follow up in reporting as to reasons why.	Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Follow up in reporting as to reasons why.	Ongoing	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Mar-22 To: 08-Nov-22	Some registry records are incomplete or incorrect. 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 in this area. The number of discrepancies is very small. Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff-related and there were only a small number. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Complete implementation of discrepancy reporting to identify incorrect records.		01/08/2023
Preventative actions taken to ensure no further issues will occur		Completion date
Discrepancy reporting actioned daily to identify and resolve issues.		01/08/2023
		Identified



Cancellation of Certification			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Mar-22</p> <p>To: 08-Nov-22</p>	<p>Certification cancelled and registry not updated for:</p> <ul style="list-style-type: none"> <li>• two installations certified as a lower category but not monitored,</li> <li>• two installations not fit four purpose due to low burden,</li> <li>• 58 installations without inspections conducted by the due date,</li> <li>• six installations with sum-check failures not remediated within three business days,</li> <li>• one control device replaced with device did not have the same characteristics, and</li> <li>• eight metering installations with invalid statistical sampling certification.</li> </ul> <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 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	Remedial action status
<p>Cancel all certs identified in the Audit.</p> <p>All cat 2 + certs checked by the compliance team before being processed by the CER team to capture technical issues.</p> <p>Ensure work orders are created for all ICPs cancelled.</p>		30/04/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Follow up with the EA as to a process for exemptions on ICPs missed inspections due to reasons out of our control. Examples Covid, Cyclone Gabrielle.</p> <p>Upgrade monitoring system for lower category monitoring.</p> <p>Sum check reporting process improvements to capture cancellation requirements.</p>		01/08/2023	

<b>Certification and Maintenance</b>			
<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 7.1  With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7  From: 01-Mar-22 To: 08-Nov-22	Certification cancelled or expired for 25,071 ICPs.  Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>High</b>	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. The controls for FCLM and TRUM for Category 1 certification appear to be sound but the LMGL controls appear weak and 79% of ICPs have cancelled or expired certification.  The impact on settlement is recorded as high because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is high.		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
Comprehensive plan submitted to the E.A  Data quality Sample testing Legacy to AMI commenced.		Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Compliance plan composes replacement , stat sampling over the next three years.		Ongoing	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6  From: 01-Mar-22 To: 08-Nov-22	Minimum load requirement for certification tests not met during one Category 2 certification.  All test results not recorded in 55 certification records.  Potential impact: Low  Actual impact: Low  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 sufficient testing is conducted to ensure the installation is accurate.  The impact is low as the accuracy of the metering installation is unlikely to have been impacted by the minimum load requirement not being met, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Follow up with ATHs  ATHs identified have resolved most of the issues mainly related to Omnibus Changes.	30/04/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Monitor Certs	Ongoing	

<b>Certification as a Lower Category</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 7.6 With: Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7 From: 01-Mar-22 To: 08-Nov-22	Certification cancelled for six ICPs where certification as a lower category monitoring is not conducted. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<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.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Cancel certs for ICPs identified.	30/04/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Upgrade monitoring system for lower category monitoring	01/08/2023	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7  From: 01-Dec-20 To: 27-Jan-22	85 meters with time dependent registers with time are not monitored every 12 months. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as none as there isn't a process in place to check the time setting on these meters.  The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Influx Energy has a modem upgrade project in place to visit all non-communicating meters in 2023. This process involves time check obligations.		Dec 24
Preventative actions taken to ensure no further issues will occur		Completion date
Seek clarification from the E.A to confirm requirements of the code. We believe it will be highly likely that there are several reasons for not being able to carry out this check. Eg main switches turned off, vacant. Do we then treat them as control certification not compliant and change register content codes to UN24 and change the control certification flag to N. This will then remove any risk to market submissions.  Investigate Storm mobile as a tool to carry out checks post modem project.		01/11/2023
Identified		

<b>Statistical Sampling</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 7.13 With: Clause 16(1) of Schedule 10.7  From: 07-Sep-22 To: 28-Feb-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	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	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.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Application for a Rule change with the EA by ATH	17/04/2023	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Historically sample test has contained both induction and electronic meters with a mix of class 1&2 and been given a maximum of 7 years. Albeit the standard says 5 years for electronic meters. The sample test is only for category one and therefore the purpose and results should be aligned with category one.	Ongoing	

Interim Certification			
Non-compliance	Description		
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 08-Nov-22	283 FCLM ICPs with expired interim certification. One TRUM ICP with expired interim certification. 19,274 LMGL ICPs where most have 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 almost eight 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	Remedial action status
Duplicated as per uncertified		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Duplicated as per uncertified		Ongoing	

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-Mar-22</p> <p>To: 08-Nov-22</p>	<p><b>FCLM</b></p> <p>Inspections not conducted within the allowable window for four Category 2, 15 Category 3 and two Category 5 metering installations.</p> <p><b>TRUM</b></p> <p>Inspections not conducted within the allowable window for 34 Category 2 and four Category 5 metering installations.</p> <p><b>LMGL</b></p> <p>Inspections not conducted within the allowable window for three Category 3 metering installations.</p> <p>Potential impact: Medium</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants could be minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Updated all category 2 ICPs to have an expiry date of 10Years as we no longer carry out cat 2 inspections.</p> <p>Cat 3 plus certs cancelled for inspections not carried out post covid and work orders sent to recertify.</p>		30/04/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Follow up with the EA as to a process for exemptions on ICPs missed inspections due to reasons out of our control. Examples Covid, Cyclone Gabrielle. 01/08/2023</p> <p>Implement changes to ensure scheduling and completion of work is actioned in the timeframes required for cat 3 plus inspections.</p>		01/08/2023	



Timeframe to correct defects and inaccuracies		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 46A  From: 12-Nov-22 To: 21-Feb-23	Remedial action not completed in required timeframe after notification of a faulty metering installation for three ICPs. 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>	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
Field service Resource constraints identified	30/04/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Building field services capacity via ATH	Ongoing	

<b>Time Errors for Metering Installations</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 03-Nov-22 To: 11-Jan-23	Clock errors greater than the threshold for 78 ICPs. Potential impact: Low Actual impact: None Audit history: Three times Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations. The errors were all small and none were across a trading period, therefore there is no impact on participants or settlement. The audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Time adjusted when identified as outside tolerances	At the time	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Time adjusted when identified as outside tolerances	At the time	