

Compliance Plan for Intellihub Ltd MEP – 2023

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Mar-22 To: 28-Feb-23	All practicable steps were not taken to ensure data is correct and that incorrect data was corrected as soon as practicable. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	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 registry related 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	Remedial action status
Intellihub will put in place resource to focus on data quality for all ATH's. Intellihub is working with ATH's, Traders and our IT team to implement long-term solutions as we continue to identify areas for improvement; This work is part of our continuous improvement cycle.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	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: 28-Feb-23	2,186 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are in place to manage timeliness, but improvements are required to ensure late notifications from the field and exceptions are reduced. 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
Intellihub is continuing to review the mechanisms for interacting with contracted ATH's with a view to reducing time delays in retrieving data. Intellihub will also be investigating opportunities to improve work order exchanges with Traders. We will also be working with our IT team to implement long-term solutions.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above Intellihub will continue to provide feedback on exceptions to ATH's and remind them of their obligations to promptly return paperwork.	Ongoing	

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Mar-22 To: 28-Feb-23	Some records updated on the registry later than 10 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as moderate in this area because they haven't changed since the last audit, and they are sufficient to ensure most updates are on time but there is room for improvement. 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
Intellihub continues to review how we process Service Requests to- and from- the field. Intellihub continues to expand the use of robotics (RPA) to improve timeliness. In addition, we are very close to go-live with the Oracle Field Services Cloud Application (OFSC) for our field service providers.		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Intellihub will continue to provide feedback on exceptions to contractors and remind them of their obligations to return paperwork promptly.		Ongoing	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6 From: 01-Mar-22 To: 28-Feb-23	Some inaccurate or incomplete certification records. Potential impact: Medium Actual impact: Low Audit history: Three times 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 a minor impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Intellihub undertook an internal audit of certification reports prior to this audit and provided feedback to all ATH's. In addition, the Delta ATH made significant improvements to their reports effective October 2022. Taken together, this has seen a significant reduction in the number of instances of inaccurate or incomplete certification records. The Intellihub MEP will continue to communicate with ATHs and provide them with the summary of all technical and compliance issues identified with Metering Installation Certification Reports during this audit. Intellihub disagrees with the Code requirement that a Prevailing load test conducted using a working standard for recertification without meter replacement is necessary.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above, Intellihub will continue to engage with ATH's on better clarity and presentation of certification reports to ensure these are fit for purpose. Over the past 18 months, Intellihub has instigated monthly Technical Compliance sessions with contracted Approved Test Houses Wells and Delta with the objectives of improving communication, alignment and ensuring we both meet Code Compliance. We have already seen good value out of these meetings, these will remain ongoing as avenues to discuss any Code or Technical issues as they arise.		Ongoing
Remedial action status		
Investigating		

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: 28-Feb-23	Some registry records 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	
Low	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 only relevant ones in this regard are tariff and compensation factor related and there were only a small number. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Intellihub has good controls in place to manage the data discrepancies to the Registry. Intellihub will continue to work with Participants for access to sites where site visits are required to help resolve some of the discrepancies identified in the table above and will place appropriate focus on achieving quality outcomes.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Oct-21 To: 05-Apr-22	MTRX and IHUB - Discrepancies not resolved within five business days. BOPE – Discrepancy report not run since 1 st October 2021. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate in this area because discrepancy reporting processes are strong but are not currently in place for BOPE. 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	Remedial action status
Intellihub will continue to resolve discrepancies which have the highest impact on participants.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Intellihub is committed to an ongoing focus on continuous improvements to the quality and completeness of all of its transactions.	Ongoing	

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: 28-Feb-23</p>	<p>Certification not cancelled on the registry within 10 business days for:</p> <ul style="list-style-type: none"> • one Category 2 ICP with missed inspection, • ten meters (of a sample of 30) where sum-check failure was not resolved within three business days, and • five bridged Category 1 meters. <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		
Low	<p>I have recorded the controls as moderate in this area because most processes are managed with sufficient controls to avoid cancellation of certification.</p> <p>There is a minor impact on other participants; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Category 2 missed inspection issue was identified shortly after the change of ownership and MEP to Intellihub on 01/10/2022. Certification has subsequently been cancelled on the Registry.</p> <p>Sum-Check failure. Intellihub is committed to an ongoing focus on continuous improvements and will put measures in place to ensure certification is cancelled within the required timeframes.</p> <p>The cause for delays in the cancellation of certification of bridged meters has been identified and the issue has been resolved.</p>		<p>Resolved</p> <p>Ongoing</p> <p>Resolved</p>	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
		31/05/2022	

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 01-Jan-97 To: 28-Feb-23	Certification expired, cancelled or late for 14,371 ICPs. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Strong Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as strong in this area because at the time of the audit Intellihub demonstrated its recertification programme which will address a significant portion of the ICPs with expired certification. 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
Intellihub has an ongoing program of recertification using the selected component method for legacy, uncertified meters (for which statistical sampling is not an available option). For example, unknown meter makes and models. Intellihub is also commencing a programme of recertification by statistical sampling project, commencing in May 2023. This should address a significant proportion of the expired Category 1 ICP's.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) From: 01-Mar-22 To: 28-Feb-23	All test results not recorded in 17 certification records. Prevailing load test not conducted for five Category 1 metering installations. Potential impact: Medium 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 as ATH processes ensure that testing requirements are met in most scenarios but there is room for improvement. 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
Considerable improvements have been made by contracted ATH's over the past 6 months, especially since October 2022. The audit findings primarily relate to the period prior to this date. Prevailing load test not conducted for Category 1 ICP's: Intellihub interpretation of Line 2 of Table 3 in Part 10 is that a Prevailing Load Test should not be required when a meter is not being changed, and the installation certification expiry date remains unchanged. We are currently awaiting a response from the Authority to clarify this. In the interim, Intellihub is ensuring that all other tests and checks are completed including a raw meter data output test to confirm installation accuracy.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 14-Aug-21 To: 05-Apr-22	102 meters with time dependent meter registers where time was not monitored every 12 months. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as MTRX has the capability to identify this, but regular monitoring has not taken place. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Intellihub has developed a specific report to identify meters which become subject to the timekeeping Requirements, with AMI Comms = N. Intellihub will, where appropriate, replace equipment to ensure reliable AMI communications Intellihub is in the process of developing a method to perform local time synchronization appropriate for each of our meter types, locations and available technicians.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above		Ongoing
Remedial action status		
Investigating		

Compensation Factors		
Non-compliance	Description	
Audit Ref: 7.14 With: 24(3) of Schedule 10.7 From: 12-Sep-22 To: 27-Apr-23	Compensation factors were incorrectly recorded on the registry for two BOPE ICPs. Potential impact: High Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as the process for checking certification reports did not identify the variance in compensation factor. The impact on settlement is still under investigation and it has not been determined if the incorrect compensation factor is being used. I have recorded the impact as low due to the short timeframe since certification; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Intellihub has investigated these errors on the Registry and is in discussion with the respective participants.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: 46(1) of Schedule 10.7 From: 05-Dec-22 To: 15-Feb-23	Two Category 2 metering installations not inspected within the maximum inspection period. 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 Intellihub has a regime in place and only two inspections were not conducted within the maximum inspection period. It is unlikely that the missed inspections will impact on other participants and on settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Category 2 Inspections missed. This issue was proactively identified shortly after the recent change of ownership and MEP. Certification has been cancelled on the Registry.	15/02/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	15/02/2023	

Investigation of Faulty Metering Installations		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 01-Sep-19 To: 05-Nov-20	Report on defective Category 2 metering installation not provided to affected participant within 10 business days. Potential impact: Medium 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
Intellihub accepts that there were regrettable delays in this case. A statement of situation was provided to the affected Trader as soon as this issue was resolved in the field.	05/08/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	05/08/2022	

Meter bridging		
Non-compliance	Description	
Audit Ref: 9.5 With: Clause 10.33C From: 01-Dec-22 To: 01-May-23	Meters not reinstated after bridging within five business days of bridging for 10 Category 1 ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	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
The cause for delays in the remediation of bridged meters has been identified and the issue has been resolved.	11/05/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	11/05/2023	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Mar-22 To: 23-Mar-23	49 examples of clock errors outside the allowable thresholds in the most recent daily reporting. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	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
There are no further preventative actions identified that Intellihub can reasonably implement.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Raw meter data and compensation factors		
Non-compliance	Description	
Audit Ref: 10.11 With: Clause 8(10) of Schedule 10.6 From: Unknown To: 27-Apr-23	Compensation factor applied to raw meter data for 20 BOPE ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as a plan has been put in place to remedy this situation. The impact is assessed to be low, as there has been a minimal impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
Remedial action is in progress. Regular updates are being provided to the Electricity Authority.	31/12/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	31/12/2023	