

## Compliance plan for SmartCo MEP – 2023

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6  From: 01-May-22 To: 05-Apr-23	Registry not always accurate and not always updated as soon as practicable by SmartCo. Certification records not always accurate. 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>	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.	
Actions taken to resolve the issue	Completion date	Remedial action status
All identified accuracy issues are in the process of being corrected. Timeliness issues that have already occurred are unable to be resolved.	30/09/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Smartco will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion.	Ongoing	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-May-22 To: 05-Apr-23	Some registry updates were 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	
<b>Low</b>	Controls are recorded as moderate because there is room to improve the timeliness by ensuring more regular updates. 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
Timeliness issues that have already occurred are unable to be resolved	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Smartco will review its processes to determine what improvements can be made and communicate with other participants to remind them of their responsibilities.	Ongoing	

<b>Changes to Registry Records</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-May-22 To: 04-Apr-23	Some records updated to the registry later than 10 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as strong because they mitigate risk to an acceptable level. Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Timeliness issues that have already occurred are unable to be resolved		NA
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
Smartco will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion		Ongoing
<b>Remedial action status</b>		
Identified		

Non-compliance	Description		
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6  From: 01-May-22 To: 04-Apr-23	Certification records were not accurate and complete for 24 of a sample of 49 certification reports. Potential impact: Medium Actual impact: Low Audit history: Three 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 because 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
The identified issues will be reviewed and corrected where required.		30/09/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
SmartCo will continue to review this area and further reinforce with its ATHs this requirement and determine how this can be monitored and, where issues are identified, raised with its ATHs promptly		Ongoing	

<b>MEP Response to Switch Notification</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.1 With: Clause 1 (1) of Schedule 11.4 From: 18-Aug-22 To: 29-Aug-22	MN file not sent within 10 days for 116 ICPs. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as strong because SmartCo has an automated process in place to accept nominations. 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>
Timeliness issues that have already occurred are unable to be resolved	NA	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
SmartCo will continue to monitor systems that run required processes to ensure issues are identified in a timely manner	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-May-22 To: 04-Apr-23	Some registry records were 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 because they mitigate risk to an acceptable level. Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All identified accuracy issues are in the process of being corrected. Timeliness issues that have already occurred are unable to be resolved		30/09/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Smartco will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion.		Ongoing	

<b>Correction of Errors in Registry</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-May-22 To: 04-Apr-23	All registry validation process unable to be demonstrated. 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 whilst SmartCo has processes to correct registry information it was unable to fully demonstrate this during the audit. 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>
See below		
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
Smartco will review and document its processes to ensure they are complete and that a wider audience is aware of them.		30/09/2023
		Identified

<b>Cancellation of Certification</b>			
<b>Non-compliance</b>	<b>Description</b>		
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-May-22</p> <p>To: 04-Apr-23</p>	<p>Certification cancelled, and registry not updated within 10 business days for:</p> <ul style="list-style-type: none"> <li>• 1,550 Category 1 ICPs with minimum number of sample inspections not conducted,</li> <li>• 21 ICPs where sum-check failures were not resolved within three business days.</li> </ul> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<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>The responsibility for SmartCo 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>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>All identified accuracy issues are in the process of being corrected. Timeliness issues that have already occurred are unable to be resolved.</p> <p>The 1550 CAT1 ICPs that were not updated will be resolved shortly through recertification as they are included in the current In-Service testing program.</p>		30/09/2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
<p>Smartco will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion.</p>		Ongoing	



Certification and Maintenance			
Non-compliance	Description		
Audit Ref: 7.1 With: Clause 10.38 (a) From: 01-Aug-21 To: 04-Apr-23	Certification expired or cancelled for more than 2,169 ICPs. Potential impact: High 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 the SmartCo processes have been improved to avoid cancellation of certification. The impact on settlement is recorded as low because it is unlikely that there are accuracy issues with the metering installations with cancelled certification, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All identified accuracy issues are in the process of being corrected. Timeliness issues that have already occurred are unable to be resolved. The 1550 CAT1 ICPs that were not updated will be resolved shortly through recertification as they are included in the current In-Service testing program.		30/09/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Smartco will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion.		Ongoing	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b)  From: 14-Nov-22 To: 04-Apr-23	Prevailing load tests not conducted for eight Category 1 metering installations.  Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
SmartCo does not believe a prevailing load is required in this situation (Certified BTS>Perm) and will look to seek clarification from the Authority	30/09/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Where we believe prevailing load test is required, our policy is to replace meters as the test houses do not have provision of expensive equipment to undertake this testing.	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Aug-21 To: 04-Apr-23	185 ICPs with time dependent meter registers are 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	
<b>Low</b>	I have recorded the controls as moderate as SmartCo 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	Remedial action status
SmartCo will work with other participants to have the metering at the 185 ICPs either remotely monitored and corrected or physically replaced.	30/09/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
SmartCo will review how it deals with meters where the installation is non-communicating and there is a time dependent code with a view to ensuring a physical check within each 12 months, where required.	30/11/2023	

<b>Meter bridging</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 9.5 With: Clause 10.33C  From: 19-Sep-22 To: 19-Jan-23	Meter not reinstated after bridging within five business days of bridging for one Category 1 ICP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as strong as the SmartCo process normally ensures that remedial action is completed in the required timeframe.  The impact on settlement and participants is minor as only one Category 1 ICP was affected; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
No action required as this has been physically resolved	NA	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
SmartCo will review its processes to determine what improvements can be made to meet the Code requirements. It is noted that due to the nature of the activities involved it is not always possible to achieve the defined timeline requirements as we are reliant on others.	30/09/2023	

Time Errors for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.7</p> <p>With: Clause 8(4) of Schedule 10.6</p> <p>From: 01-May-22</p> <p>To: 04-Apr-23</p>	<p>360 examples of clock errors outside the allowable thresholds in the 17 April 2023 reports.</p> <p>Some time errors for Category 2 meters not reported to reconciliation participants.</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>I have recorded the controls as strong because clocks are synchronised during every successful interrogation.</p> <p>The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
See below	30/11/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
SmartCo have been in touch with system vendors to assist in understanding and amending appropriate parameters. If system changes are required, then formal change process will be followed.	30/11/2023	