

Compliance plan for Delta MEP 2023

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 01-Mar-22 To: 17-Feb-23	Registry not always updated as soon as practicable by Delta. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	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
Engage a Metering Administrator whose duties will include Registry updates.	01/05/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training and onboarding of Metering Administrator and Technical Adviser	01/05/2023	

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Mar-22 To: 17-Feb-23	Five late updates after recertification. 71 backdated control device updates back to a period when Delta was the MEP. Six corrections not updated to the registry within 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 there is room for improvement. The late updates have a minor impact on other participants who rely on this information, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Engage a Metering Administrator whose duties will include Registry and Gentrack updates.		01/05/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Onboarding and training of Metering Administrator		01/05/2023	

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: 17-Feb-23	Validity period of components not included in certification reports. 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 because they mitigate risk to an acceptable level. There is no impact on settlement or participants, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Information contained in Certificates and reports to be reviewed.	30 June 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Liaise with Delta's Systems guys to ensure all required information is detailed in the Certificates.	30/06/2023	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Jul-21 To: 04-Apr-23	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	
Low	I have recorded the controls as moderate in this area. 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
Engage a Metering Administrator whose duties will include Registry records and Gentrack updates.	01/05/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Training of Metering Administrator and Technical Adviser prioritised.	01/05/2023	

Correction of Errors in Registry			
Non-compliance	Description		
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Mar-22 To: 17-Feb-23	Discrepancies not resolved within 5 business days. Potential impact: Medium Actual impact: Medium 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 because they mitigate risk most of the time, but some late updates still occur. Some of the discrepancies may 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
Discrepancy Report frequency to be increased and Technical Manager to analyse and action in conjunction with Metering Administrator and Technical Adviser.		01/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Sustained communication between Aurora and Metering & Field Operations business Unit. Metering Services Manager to check and ensure identified discrepancies are actioned expeditiously.		01/06/2023	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Jul-21</p> <p>To: 04-Apr-23</p>	<p>Certification cancelled, and registry not updated within 10 business days for 107 ICPs with invalid recertification by statistical sampling.</p> <p>Category 2 ICPs 0000007071DE191 and 0000018178DE745 were incorrectly certified as part of a statistical sampling project on 15/12/2020. Certification is now cancelled but not within 10 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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>The responsibility for Delta 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
Engage a Metering Administrator whose duties will include Registry updates.	01/05/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Training of Metering Administrator prioritised.	01/05/2023	

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-Mar-22</p> <p>To: 17-Feb-23</p>	<p>845 ICPs with expired or cancelled certification.</p> <p>Certification is cancelled for 107 ICPs with invalid recertification by statistical sampling.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: once</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 Delta has a sound statistical sampling regime in place, and this is in the process of being deployed to address this situation.</p> <p>The impact on settlement and participants is minor due to the low number of ICPs; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Improve Statistical sampling process.	01/05/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Technical Manager to review and fine-tune Stat Sampling process.	01/05/2023	

Certification Tests			
Non-compliance	Description		
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 04-Apr-22 To: 05-Apr-23	Register advance test not conducted for two ICPs Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because Delta has adopted the recommendation to re-visit to conduct register advance tests. The potential 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
Both sites have been revisited and confirmed register advancement.		21/04/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
Improve job review and photo-checking process		10/06/2023	