

Compliance plan for Advanced Metering Assets Limited MEP – 2023

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 01-Nov-22 To: 29-May-23	NGCM Services access interface incorrectly recorded in the certification records for two of 65 metering installations sampled. Potential impact: Low Actual impact: None 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 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
Vector metering will request that the non-compliant certification reports are corrected by the ATH.	31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to work with ATHs to ensure they are aware that all possible SAI must be stated in the certification record.	31/10/2023	

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Nov-22 To: 29-May-23	AMCI and NGCM Some certification records not complete and accurate. Registry not always updated 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	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
Vector Metering is in the process of correcting all identified inaccuracies.		31/10/2023
Preventative actions taken to ensure no further issues will occur		Completion date
Vector Metering will look at its process and training to identify any opportunities to improve its performance and strengthen its controls.		31/12/2023
		Identified

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Nov-22 To: 29-May-23	AMCI and NGCM 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	
Low	Controls are in place to ensure the timeliness of updates, but AMA is often prevented from updating the registry due to 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
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	
Vector Metering will review its processes to determine what improvements can be made and communicate with other participants to remind them of their responsibilities.	Ongoing	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Nov-22 To: 29-May-23	NGCM and AMCI Some records updated to the registry later than ten 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. Late updates for new connections can have a minor impact on participants and settlement, 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	
Vector Metering 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, and strengthen its controls.	Ongoing	

Accurate and Complete Records			
Non-compliance	Description		
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Nov-22 To: 29-May-23	NGCM and AMCI Some inaccurate 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 instruction has been provided to ATHs, but there is further work to be done. 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
The identified issues will be reviewed and corrected where required.		31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Vector Metering 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	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 04-Nov-22 To: 26-May-23	NGCM Seven late MN files. AMCI Ten late MN files. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as the processes to identify and accept identify nominations are robust. The impact is low; 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	
Vector Metering 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		
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 01-Nov-22</p> <p>To: 29-May-23</p>	<p>NGCM and AMCI</p> <p>Some registry records were incomplete or incorrect.</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		
Low	<p>I have recorded the controls as moderate in this area. There are still a small number of areas where improvements can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.</p>		
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		31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Vector Metering 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, and strengthen its controls.		31/12/2023	

Correction of Errors in Registry			
Non-compliance	Description		
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Nov-22 To: 29-May-23	NGCM and AMCI Discrepancies not resolved within five 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. There are still a small number of areas where improvements can be made. 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
All identified accuracy issues are in the process of being corrected.		31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Vector Metering will look at its process to identify any opportunities to improve its performance and strengthen its controls. However, we note that we are heavily reliant on other participants completing their activities before we can undertake amendments.		31/12/2023	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Nov-22</p> <p>To: 18-Jul-23</p>	<p>Certification cancelled, and registry not updated within ten business days for:</p> <p>NGCM</p> <ul style="list-style-type: none"> • three installations with low burden, • three bridged meters, and • 383 Category 2 installations with inspection not conducted. <p>AMCI</p> <ul style="list-style-type: none"> • 142 installations with inspection not conducted, • one installation with testing not conducted within 20 business days of sufficient load being identified, and • one faulty metering installation. <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 as there is room for improvement.</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
All identified instances are in the process of being corrected on the Registry	31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to review its processes and training to ensure certifications are cancelled on the Registry.	Ongoing	

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: 12-Aug-14</p> <p>To: 29-May-23</p>	<p>NGCM</p> <p>Certification expired or cancelled for 25,654 NGCM metering installations.</p> <p>AMCI</p> <p>Certification expired for 435 AMCI 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	
Medium	<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. The audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Vector Metering has been actively working with the Electricity Authority separately to this audit process on resolving the expired certifications issues. Vector Metering has an established program of work with clear and continual monitoring. Progress continues to be positive and is tracking in accordance with commitments made. Issues such as technician resourcing, access to properties (e.g. customer refusal, vacancy, or another MEP nominated), and safety (VIR, ACM, gas proximity) continue to be present. Solutions for the installations that are unable to be certified are continually being worked on in conjunction with traders, ATHs, and metering vendors.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
See above		

Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.2</p> <p>With: Clause 10.38(b) and clause 9 of Schedule 10.6</p> <p>From: 01-Nov-22</p> <p>To: 29-May-23</p>	<p>NGCM</p> <p>Some certification tests were not conducted by ATHs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because the main test not conducted is prevailing load using a working standard to recertify an installation with existing components. Other testing confirms the integrity of the installation, and the industry has the view that this test is not required.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering does not believe a prevailing load is required in Certified BTS>Perm situations and will look to seek clarification from the Authority	30/09/2023	Identified
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	

Insufficient Load for Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.7</p> <p>With: Clause 14 (4) of Schedule 10.7</p> <p>From: 23-Jun-23</p> <p>To: 18-Jul-23</p>	<p>AMCI</p> <p>One metering installation with testing not conducted within 20 business days of sufficient load being identified.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have recorded the controls as strong in this area as the AMCI monitoring process ensures that ATHs are advised immediately when sufficient load is identified.</p> <p>There was no impact on settlement and participants as testing confirmed the accuracy of the metering installation; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
No further action required as testing was conducted.		NA
Preventative actions taken to ensure no further issues will occur		Completion date
The non-compliance was access related and outside of the control of Vector Metering. Vectoring Metering will reconfirm the obligations with other participants so that they remain aware.		31/10/2023
Cleared		

Alternative Certification Requirements		
Non-compliance	Description	
Audit Ref: 7.9 With: Clauses 32(2), (3) and (4) of Schedule 10.7 From: 09-Jan-23 To: 14-Feb-23	AMCI Notification of alternative certification not provided to the Authority within ten business days for two metering installations. Potential impact: Low 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 in this area because there is room for improvement. There is no impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
No action required as the information has been provided	NA	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector metering will work with ATHs to ensure the delivery of certification records is not delayed meeting its own obligations.	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
<p>Audit Ref: 7.10</p> <p>With: Clause 23 of Schedule 10.7</p> <p>From: 01-Nov-22</p> <p>To: 29-May-23</p>	<p>NGCM</p> <p>809 ICPs with time dependent meter registers with time that were not monitored every 12 months.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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 as NGCM has the capability to identify this, but regular monitoring has not taken place.</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
Vector Metering will work with other participants to have the metering either remotely monitored and corrected or physically replaced.	31/12/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering 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	31/12/2023	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 29-May-23	NGCM 17,737 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	
Medium	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. The audit risk rating is recorded as medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Vector Metering has been actively working with the Electricity Authority separately to this audit process on resolving the expired certifications issues. Vector Metering has an established program of work with clear and continual monitoring. Progress continues to be positive and is tracking in accordance with commitments made. Issues such as technician resourcing, access to properties (e.g. customer refusal, vacancy, or another MEP nominated), and safety (VIR, ACM, gas proximity) continue to be present. Solutions for the installations that are unable to be certified are continually being worked on in conjunction with traders, ATHs, and metering vendors.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
See above		

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-Nov-22</p> <p>To: 29-May-23</p>	<p>NGCM</p> <p>383 metering installations with inspection not conducted.</p> <p>AMCI</p> <p>142 metering installations with inspection not conducted.</p> <p>20 NSP metering installations with inspections not conducted.</p> <p>Potential impact: Medium</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		
Medium	<p>I have recorded the controls as moderate in this area for NGCM because reporting is in place but there is room for improvement. AMCI's inspection controls are rated as moderate because there is a regime in place to identify and manage inspections but not all inspections were able to be completed.</p> <p>The issues found can potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All identified instances are in the process of being corrected on the Registry		30/09/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Vector Metering recognise that there are several issues that contribute to this non-compliance, primarily access and field resources. The impact of COVID is still acutely present (e.g. limiting the pool of international resources). We are now hearing that this is easing but it has created a backlog of work that will likely exist until an appropriate number of technicians can be trained. Considerations must also be made for the future pipeline of work and the sustainable necessity of these roles by avoiding peaks where possible.		Ongoing	

Statement of Situation			
Non-compliance	Description		
Audit Ref: 9.3 With: Clause 46(2) From: 14-Oct-22 To: 17-Oct-22	AMCI Statement of situation for faulty metering installation at NSP TGC0011TENCEN not provided to the Authority and affected participants within three business days. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong as the AMCI understands the requirement to provide information to affected participants and the Authority. The impact on settlement and participants is minor as the notification was late by one day; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
No further action required as the statement has been provided.		NA	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Vector Metering will remind team members of these obligations		31/08/2023	

Timeframe for correct defects and inaccuracies		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 46A From: 01-Nov-22 To: 29-May-23	NGCM Remedial action not completed in required timeframe after notification of a faulty metering installation for nine ICPs. Potential impact: Low 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 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
Vector Metering will continue to work on resolving the outstanding issues on the installations.	31/10/2012	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to 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 due to the reliance on other parties.	Ongoing	

Meter bridging		
Non-compliance	Description	
Audit Ref: 9.5 With: Clause 10.33C From: 01-Nov-22 To: 29-May-23	NGCM Meters not reinstated after bridging within five business days of bridging for a sample of 15 of 26 bridged Category 1 meters. Potential impact: Low 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 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
Vector Metering will continue to work on resolving the outstanding issues on the installations.	31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering is working with traders to obtain pre-approval for the re-instatement of the metering if the initial request has come from them by treating it as a single job with multiple site visits. As this engagement is with multiple parties and involves commercial arrangements, we unfortunately do expect this to be a prompt process. This is an example of a Code obligation on a participant where it is often dependent on the actions of another party to achieve full compliance. An MEP requires permission from the trader to access a property and, in-turn, a trader must provide their customer with the advanced notification in their customer contracts. This is commonly at least 10 business days prior to access unless it is for safety reasons, which rectifying a bridged meter would not be. This 10-day period is what the EA expects as noted in its Principles and Minimum Terms and Conditions for Domestic Contracts. Vector Metering accepts that this mismatch in timeframes will not always be the primary cause in not meeting the obligation.	31/10/2023	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8(2), 8(3), 8(5) and 8(6) of Schedule 10.6 From: 15-Sep-21 To: 29-Jun-23	AMCI Data not collected within the maximum interrogation cycle for seven 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 interrogation occurs daily and when interrogation is not successful the trader is notified. In all cases AMCI is awaiting further information or action from traders. 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
Vector Metering will continue to work with the traders to ensure they are actively working on resolving the issues.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering systems or process are not the cause of this identified non-compliance, and it is fully reliant on other participants.	NA	

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-Nov-22</p> <p>To: 29-May-23</p>	<p>NGCM</p> <p>2,116 examples of clock errors outside the allowable thresholds in the most recent reports.</p> <p>AMCI</p> <p>44 clock errors outside the thresholds.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
NA	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Vector Metering will continue to assess the results of clock checks to identify any opportunities for process or technical improvements. This will include working with vendors.	Ongoing	