

Compliance Plan Wells ATH 2023

Provision of Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.2 With: Clause 10.6 of Part 10</p> <p>From: 01-Dec-22 To: 19-Sep-23</p>	<p>Incorrect certification method recorded in one metering installation certification report.</p> <p>Certifying ATH incorrectly recorded in three metering installation certification reports.</p> <p>Incorrect burden range recorded for one category 2 metering installation.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The incorrectly recorded information has no impact on the accuracy of the metering installations; therefore the audit risk rating is recorded as low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
V2 Job 5074374 for 0000921123TU3EC corrected to record "Comparative" recertification. MEP was notified on 16-10-23.	16-10-23	Identified
V2 jobs 5081258 for 1000609260PC8FF, 5090937 for 0357023315LCC86 and 5092056 for 0197337368LCE01 corrected to record "Wells" as the Meter certifying ATH. MEP was notified on 16-10-23.	16-10-23	
Prior to this audit, the minimum burden field had already been identified by ourselves as able to have invalid values entered with less than ideal validation to pick up the error. These workflows have therefore already been modified (internal ticket CWELLS-2038) so that the free-form text field is now a drop-down list to limit the entered value to only valid values.	24-8-23	
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>An additional reminder is being published in the next weekly Metering Technical Reminder to ensure that certification method details are correct even with revisit jobs like this.</p>	<p>23-10-23</p>	
<p>An additional reminder is being published in the next weekly Metering Technical Reminder to ensure that both the technicians and the back-office data checkers remember that all of our device certifications are currently issued by Wells ATH with there not being any pre-certification of meters at this time.</p>	<p>23-10-23</p>	
<p>Prior to this audit, the minimum burden field had already been identified by ourselves as able to have invalid values entered with less than ideal validation to pick up the error. These workflows have therefore already been modified (internal ticket CWELLS-2038) so that the free-form text field is now a drop-down list to limit the entered value to only valid values.</p>	<p>24-8-23</p>	

Certification at a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 3.10</p> <p>With: Clause 6(4) Of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 18-May-23</p>	<p>All information regarding lower category certification not included in the certification report for one metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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 because there is room for improvement.</p> <p>If the MEP does not monitor load each month certification will be cancelled; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Con-X Job 5004260 for 0006515592RN711 did have a note added on 28-3-22 stating "ICP certified as Cat 2. CTs are 800/5. As per data entered by Tech, the Site Fuse Capacity is 600A, therefore the MEP will be required to monitor usage" however this note was added after the certification data had been sent to the MEP by B2B on 8-12-21 and the addition of this note did not trigger a resend of the data. The fact that the MEP had not been notified was identified at a later date and the 28-3-22 note was subsequently emailed to the MEP on 28-3-22.</p>	28-3-22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Following our April 2022 audit, MEPs were contacted to discuss this code requirement and to gain their agreement on a method of achieving full compliance. Additionally, we initiated the exploration of options for modifying our workflows to enable communication on Lower Category Certification requirements between ourselves and MEPs (refer internal ticket CWELLS-1880). A possible method for obtaining certification instruction from MEPs was being developed which would introduce a new Turn-Down Reason in the workflows to request information from the MEP and await the required Lower Category certification instruction confirmation and historic usage data. This approach is necessary because unless the instruction is in the original job note, it will not be known until the tech arrives at site that certification at a Lower Category is going to be required. At this stage however it seems that some participants might not fully acknowledge the code requirements in this area and it might therefore take some time before an elegant solution is achieved. In the mean time we have trained techs and back-office staff to recognize such installations and manually request the required information and MEP instruction, as has been occurring since the time of this job, and evidence of which was provided during this audit.</p>	<p>Indeterminate</p>	
--	----------------------	--

Determining Metering Installation Category at a Lower Category Using Current Transformer Rating		
Non-compliance	Description	
<p>Audit Ref: 5.7</p> <p>With: Clause 6(2)(b) & (d) of Schedule 10.7</p> <p>From: 01-Apr-21</p> <p>To: 18-May-23</p>	<p>Wells does not have sufficient information to determine certification as a lower category is appropriate for ICP 0006515592RN711 as historic load information was not obtained from the MEP prior to certification.</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 because there is room for improvement.</p> <p>If the MEP does not monitor load each month certification will be cancelled; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Con-X Job 5004260 for 0006515592RN711 did have a note added on 28-3-22 stating "ICP certified as Cat 2. CTs are 800/5. As per data entered by Tech, the Site Fuse Capacity is 600A, therefore the MEP will be required to monitor usage" however this note was added after the certification data had been sent to the MEP by B2B on 8-12-21 and the addition of this note did not trigger a resend of the data. The fact that the MEP had not been notified was identified at a later date and the 28-3-22 note was subsequently emailed to the MEP on 28-3-22.</p>	28-3-22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Following our April 2022 audit, MEPs were contacted to discuss this code requirement and to gain their agreement on a method of achieving full compliance. Additionally, we initiated the exploration of options for modifying our workflows to enable communication on Lower Category Certification requirements between ourselves and MEPs (refer internal ticket CWELLS-1880). A possible method for obtaining certification instruction from MEPs was being developed which would introduce a new Turn-Down Reason in the workflows to request information from the MEP and await the required Lower Category certification instruction confirmation and historic usage data. This approach is necessary because unless the instruction is in the original job note, it will not be known until the tech arrives at site that certification at a Lower Category is going to be required. At this stage however it seems that some participants might not fully acknowledge the code requirements in this area and it might therefore take some time before an elegant solution is achieved. In the mean time we have trained techs and back-office staff to recognize such installations and manually request the required information and MEP instruction, as has been occurring since the time of this job, and evidence of which was provided during this audit.</p>	<p>Indeterminate</p>	
--	----------------------	--

Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.12</p> <p>With: Clause 9(1) of Schedule 10.7</p> <p>From: 01-Dec-22</p> <p>To: 19-Sep-23</p>	<p>At least four category 1 metering installations recertified without a prevailing load test.</p> <p>Potential impact: Low</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	
Low	<p>I have recorded the controls as strong because they mitigate risk to an acceptable level.</p> <p>There is no impact of not doing a prevailing load test, because raw meter data output tests are conducted.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Acknowledged but disputed due to industry acknowledged code error – as per October 2022 audit	-	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As discussed, the EA have been contacted regarding this apparent error. MEPs have been contacted and all agree that there is an error and that they do not require Wells ATH to perform a Prevailing Load Test in these circumstances – as per October 2022 audit	Indeterminate	

Selected Component - Circumstances where method may be used		
Non-compliance	Description	
<p>Audit Ref: 5.18</p> <p>With: Clause 11(4) of Schedule 10.7</p> <p>From: 01-Dec-22</p> <p>To: 19-Sep-23</p>	<p>At least four category 1 metering installations recertified without a prevailing load test.</p> <p>Potential impact: Low</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	
Low	<p>I have recorded the controls as strong because they mitigate risk to an acceptable level.</p> <p>There is no impact of not doing a prevailing load test, because raw meter data output tests are conducted.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Acknowledged but disputed due to industry acknowledged code error – as per October 2022 audit	-	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As discussed, the EA have been contacted regarding this apparent error. MEPs have been contacted and all agree that there is an error and that they do not require Wells ATH to perform a Prevailing Load Test in these circumstances – as per October 2022 audit	Indeterminate	

Measuring Transformer Certification		
Non-compliance	Description	
<p>Audit Ref: 5.67</p> <p>With: Clause 3 of Schedule 10.8</p> <p>From: 01-Dec-22</p> <p>To: 19-Sep-23</p>	<p>Incorrect burden range recorded for one category 2 metering installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 as the Wells processes ensure that in-service burden is within the burden range of the CT.</p> <p>The in-service burden was within the correct range for the current transformers so there is no impact on the accuracy of the metering installation; therefore the audit risk rating is recorded as low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Prior to this audit, the minimum burden field had already been identified by ourselves as able to have invalid values entered with less than ideal validation to pick up the error. These workflows have therefore already been modified (internal ticket CWELLS-2038) so that the free-form text field is now a drop-down list to limit the entered value to only valid values.</p>	24-8-23	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Prior to this audit, the minimum burden field had already been identified by ourselves as able to have invalid values entered with less than ideal validation to pick up the error. These workflows have therefore already been modified (internal ticket CWELLS-2038) so that the free-form text field is now a drop-down list to limit the entered value to only valid values.</p>	24-8-23	

Measuring Transformers in service burden range		
Non-compliance	Description	
<p>Audit Ref: 5.68</p> <p>With: Clause 2(1)(E) Of Schedule 10.8</p> <p>From: 01-Dec-22</p> <p>To: 19-Sep-23</p>	<p>Incorrect burden range recorded for one category 2 metering installation.</p> <p>Potential impact: Low</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	
Low	<p>The controls are recorded as strong as the Wells processes ensure that in-service burden is within the burden range of the CT.</p> <p>The in-service burden was within the correct range for the current transformers so there is no impact on the accuracy of the metering installation; therefore the audit risk rating is recorded as low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Prior to this audit, the minimum burden field had already been identified by ourselves as able to have invalid values entered with less than ideal validation to pick up the error. These workflows have therefore already been modified (internal ticket CWELLS-2038) so that the free-form text field is now a drop-down list to limit the entered value to only valid values.</p>	24-8-23	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Prior to this audit, the minimum burden field had already been identified by ourselves as able to have invalid values entered with less than ideal validation to pick up the error. These workflows have therefore already been modified (internal ticket CWELLS-2038) so that the free-form text field is now a drop-down list to limit the entered value to only valid values.</p>	24-8-23	