

Compliance Plan for Accucal MEP – 2022

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 05-Aug-20 To: 01-Mar-21	One registry update later than 15 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	Controls are in place to ensure the timeliness of 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
This was due to the new registry check process that identified an issue with channel setups and the registry was corrected. We don't expect this to occur again.	22/05/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As stated, we don't expect this issue to occur again.	22/05/2022	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jun-20 To: 28-Feb-22	11 records updated on the registry later than 10 business days. Potential impact: Low 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 in this area because Accucal has checks in place to identify and resolve discrepancies and the number of late updates was low. The impact on participants, customers or settlement could be minor where a tariff change may be required; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are continuing to work at streamlining processing and the notifications to ensure registry updates are completed on time. This has suffered a setback with a staff member that had been trained leaving the company.	22/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once new employees come on board we will ensure there are more than one person that can complete registry updates.	In progress	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4 From: 01-Feb-21 To: 22-Apr-22	Burden range not recorded in certification records for six 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 recorded as strong as the ATH burden processes ensure measuring transformers are operating within appropriate burden ranges. There is no impact on settlement and participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Working with the ATH templates to include this 'burden range'.	In progress	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
This will be an automated entry in the templates to ensure compliance.	In progress	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 06-Aug-20 To: 30-Nov-20	Two late MN files. Potential impact: Low 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 was no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The 16 day issue was due to the trader nominating ACCM without any prior correspondence and therefore an agreement had to be reached. The 58 day issue was due to the trader nominating ACCM well prior to installation and liveness of the metering. We were unable to update the registry until the metering was liveness.	22/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Developing an improved registry notification system to highlight non-rsp alerts.	In progress	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 30-Nov-21 To: 22-Apr-22	Registry validation not conducted for every month of the audit period. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because AccuCal has a validation process, but it has not been run each month. 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
System exists and had been used until the staff member left AccuCal and hasn't been completed since then. This is a workload issue and will be addressed by training a different staff member to do the check.	In progress	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional staff members will be involved in the checking process and also in ensuring it is completed.	In progress	

Cancellation of Certification		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 31-Aug-21 To: 22-Apr-22	Certification not cancelled on the registry within 10 business days for two metering installations certified at a lower category where monitoring was not conducted for each month. Potential impact: Medium Actual impact: None 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 in this area because most processes are managed with sufficient controls to avoid cancellation of certification. Whilst monitoring has not taken place each month, the maximum demand has not exceeded the category limit, so the impact is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Have not cancelled the certification as the status of these installations is known to be nowhere near the limits of Category 4, even without monthly checks. One installation is very rarely ever on load and the other has loading not exceeding 2500 kVA.	22/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Will ensure this is undertaken for any future occurrences but most likely will not down-grade any further installations.	22/05/2022	

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: 19-Jan-20 To: 22-Apr-22	Certification expired for one metering installation. 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 Accucal has a good process for monitoring certification expiry dates and has taken reasonable steps to arrange to recertify. The impact on settlement is recorded as low because it is unlikely that the expiry of the certification will lead to of failure or inaccuracy of the metering installation. The audit risk rating is recorded as low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Continuing to work with the customer on this ICP. The EA are aware of the status and have been kept informed.	22/05/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
N/A	N/A	

Certification as a Lower Category		
Non-compliance	Description	
Audit Ref: 7.6 With: Clause 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7 From: 31-Aug-21 To: 22-Apr-22	Monitoring was not conducted for each month for two metering installations certified at a lower category. Potential impact: Medium Actual impact: None 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 in this area because Accucal have a process to ensure monitoring occurs, but it was not followed in these cases. Whilst monitoring has not taken place each month, the maximum demand has not exceeded the category limit, so the impact is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Have engaged the data collector to notify ACCM if the load exceeds the Cat 4 limit for these two installations.	22/05/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Will ensure this is also undertaken for any future installations but most likely will not down-grade any further installations.	22/05/2022	