

Compliance Plan Counties Energy MEP – 2022

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 01-Feb-21 To: 06-Dec-21	Each services access interface not identified for 67 metering installations. 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
All customers of the smart meter service have been advised by way of formal contractual arrangement that they may obtain the energy data either by accepting a file into their systems delivered by Intellihub, or else they can read the meters display in traditional fashion as they see fit. In each case the demarcation of responsibility with respect to data integrity is well understood by all participants.		TBA
Preventative actions taken to ensure no further issues will occur		Completion date
A dedicated field will be added to the field work management tool at next release to record both the service access interfaces.		TBA
		Remedial action status
		Identified

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Nov-20 To: 22-Nov-21	Some information in the registry is incorrect. 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
Miscellaneous corrections and updates in progress.	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional administrative resource has recently been hired to allow deeper scrutiny of records received and uploaded.	TBA	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Nov-20 To: 22-Nov-21	3 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Once 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 Counties is often prevented from updating the registry due to late nomination or late updates from traders. 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
90% of this issue is Retailer's operations and systems that do not operate in direct accordance with the code and continue cause registry data upload issues for us as MEP, as we cannot automatically load Registry until the MEP nomination is made. This is still the case with major Retailers who continue to be allowed to operate outside the code requirements in this respect.	14/02/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The data administration team has been reminded of the requirement. They have implemented a work around system via automated email list requesting MEP nomination from Retailers to harass them to undertake their nominations.	14/02/2022	

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: 2 of Schedule 10.7 From: 01-Feb-21 To: 27-Jan-22	Maximum interrogation cycle for each services access interface not recorded in design reports. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Strong controls are in place because Counties is preparing a new standard design report which includes all required information. There is little impact because the installations are compliant despite the incorrect design reports.	
Actions taken to resolve the issue	Completion date	Remedial action status
The standard smart meter interrogation cycle is understood and automatically applied via the data processing and AMI flag automation implemented our Agent Intellihub. Due to the standardisation, there is not need to refer to specific design reports for the system to correctly operate to deliver the requirements defined in the code.	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Regardless the design reports are already under review, and this is a simple update to include. Exact timing of the release of the modified design report documentation is not finalised.	TBA	

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Nov-20 To: 22-Nov-21	Some records updated on the registry later than 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 to improve and shorten the notification process for updates. The late updates for new connections occurred after the trader had populated their records, therefore the impact on participants, customers or settlement is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Noted a couple of updates missed, and the need for additional administrative resource to address this area has been accepted.		10/02/2021	
Preventative actions taken to ensure no further issues will occur		Completion date	
Additional Administrative resource has recently been appointed to specifically attend to such MEP matters.		10/02/2021	Cleared

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Nov-20 To: 22-Nov-21	Some inaccurate certification records. Potential impact: Medium 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 because there is room for improvement. 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
Noted the field work management tool needs updates to include missing data fields to allow the full data capture of the on-site work completed.	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Both the data capture and documentation output format are programmed to be updated in order to deliver the required.	TBA	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Nov-20 To: 22-Nov-21	Some registry records 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 because 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
Noted The need for additional administrative resource to address this area has been accepted and actioned.	10/02/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Additional administrative resource has recently been appointed to specifically attend to such MEP matters.	10/02/2021	

Cancellation of Certification		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 01-Nov-20 To: 27-Jan-22	Certification not cancelled within 10 business days on the registry for: <ul style="list-style-type: none"> - six metering installations where inspections were not completed, - three metering installations where low burden is present, and - 86 ICPs with failed sum-checks. Potential impact: Low Actual impact: Low Audit history: Twice 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 installations with low burden are all recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for Counties 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.	
Actions taken to resolve the issue		Completion date
All findings above noted, and those technicalities related burdens have raised with the Test Houses concerned to have the field work redone, burdens corrected and certifications reissued. All certification cancellations completed, effective from the date of actual sumcheck failure occurring.		10/02/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Metering Installation certification cancellations within the 10 day window will be achievable going forward.		10/02/2022
		Identified

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-Nov-20</p> <p>To: 22-Nov-21</p>	<p>Certification expired for:</p> <ul style="list-style-type: none"> - 519 previously interim certified category 1 ICPs, - 299 category 1 ICPs, and - certification cancelled for 45 metering installations. <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, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The number of expired certifications due to older meters remaining in service will continue to reduce through ongoing work in the field. The new requirements to cancel metering certifications for minor miscellaneous technicalities realistically will not help the timeliness as we head toward the ultimate goal here replacing all interim certified / expired meters.</p>		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Program of work continuing – just ongoing work and pressure applied. Pointing out expired status is < 2% of the fleet, so on a positive note > 98% of ICPs are fully physically certified on site without reliance on any statistical methods.</p>		N/A	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) From: 10-Mar-21 To: 27-Jan-22	Prevailing load test not conducted for one category 1 metering installation. 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 Counties has updated its field instructions to ensure that all Category 1 meters are replaced after certification is cancelled. 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
Normal process was erroneously not followed in this one case identified.	10/02/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Ensure meters are replaced and standard raw meter data output test completed. This has been communicated to all team members during team meetings.	10/02/2022	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 22-Nov-21	519 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, therefore the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
An ongoing program of work is in place and resourced. This continues to be effective in resolving technical or customer issues and reducing the outstanding number of these ICPs in question.	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Whilst a zero number may be impractical in the near term, ongoing pressure is being applied to customers directly and also via Retailers to allow access to the metering installations, or for them to upgrade unsatisfactory enclosures or unsafe electrical wiring / installations.	TBA	

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 13-Feb-21 To: 27-Nov-21	Inspections not conducted for six installations. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. 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
Resolved by recertification of the specific sites concerned. The overall work program was impacted by lockdowns and restrictions, however the majority of inspections and recertifications achieved on time.	10/02/2022	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Assuming no Covid lockdowns and restricted movements – generally late ICP inspections are not expected to feature in 2022	10/02/2022	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Nov-20 To: 02-Dec-21	34 examples of clock errors outside the allowable thresholds in the 2 December 2021 report. 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	I have recorded the controls as strong because clocks are synchronised during every successful interrogation. The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Typically, newly installed meters need initial time sync to system time at first interrogation. Otherwise, the audit shows the system is catching and correcting the minor time drifts as they occur, and is as good as the technology is as it stands in 2022.	10/02/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Discussed at length with L&G and Intellihub who advise there is no practical way to further improve the overall time keeping of the meters deployed and time syncing systems.	10/02/2022	

Investigation of AMI interrogation failures		
Non-compliance	Description	
Audit Ref: 10.12 With: Clause 8(11), 8(12) and 8(13) of Schedule 10.6 From: 01-Feb-21 To: 03-Dec-21	Reporting and processes not in place to resolve interrogation issues or change the AMI flag to "N" at 25% of the MIC or 30 days between 1 February and 20 May 2021. No action taken to change the AMI flag to "N" or cancel the certification for five meters which had not been successfully interrogated within 30 days or 25% of the maximum interrogation cycle. 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 reporting had been put in place at the time of the audit. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Resolved via Intellihub systems update in 2021		10/02/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Resolved via Intellihub systems update in 2021		10/02/2022
		Cleared