

Compliance plan for Influx MEP 2022

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 01-Dec-20 To: 27-Jan-22	Services access interface not recorded in certification records for five metering installations. Potential impact: Low Actual impact: None 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 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
Influx records the correct access interface both in its MDMS and the Registry.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Follow up with identified ATHs to correct error.	30/04/2022	

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Feb-21 To: 27-Jan-22	Registry not always updated as soon as practicable in some cases. 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	The controls for LMGL are weak because certification has been cancelled for several thousand ICPs for many years. TRUM and FCLM controls are stronger but still require improvement. Overall, the controls are considered moderate. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
In regard to LMGL, Influx has not been notified by either Delta ATH or the Electricity Authority that certification has been cancelled for several thousand ICPs. On acquisition the registry indicated these to be compliant and in dispute.		
Preventative actions taken to ensure no further issues will occur		Completion date
Add to discrepancy reporting in progress.		30/04/2022
		Disputed

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Dec-20 To: 27-Jan-22	327 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 FCLM 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
New work order tracking system in test . Will enable to track fieldwork activities to better manage timeframes.	30/04/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Add to discrepancy reporting in progress.	30/04/2022	

Design Reports for Metering Installations			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Dec-20 To: 27-Jan-22	Design Reports did not contain all relevant information. 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 recorded as strong because processes are in place to ensure that correct design reports are used, and a new suite of design reports has recently been published. 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
New suite of design reports recently completed		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
New suite of design reports recently completed		Completed	

Metering Installation Design & Accuracy		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 01-Feb-21 To: 27-Jan-22	Design Report not recorded for three metering installations. 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 recorded as strong because processes are in place to ensure that correct design reports are used. 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
All category 2 plus sites to be checked by Influx Test House	30/04/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Follow up with identified ATHs to correct error.	30/04/2022	

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Dec-20 To: 27-Jan-22	Some records updated on the registry later than 10 business days. 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	I have recorded the controls as moderate in this area because they reduce risk most of the time but there is still room for improvement, especially with new connection 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
Add to discrepancy reporting in progress.		30/04/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Work with parties identified in reporting to improve processes to meet MEP obligations		Ongoing	

Accurate and Complete Records			
Non-compliance	Description		
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Dec-20 To: 27-Jan-22	Some inaccurate certification records. 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 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
Registry updates completed as identified in the audit		21/02/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
All category 2 plus sites to be checked by Influx Test House Add to discrepancy reporting in progress.		30/04/2022	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Dec-20 To: 27-Jan-22	14 late MN files. Potential impact: Low Actual impact: None Audit history: Twice 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
Add to Discrepancy Reporting		30/04/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Follow up reason for late MN as to identify and remedy cause.		Ongoing
		Identified

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Dec-20 To: 27-Jan-22	Some registry records incomplete or incorrect. 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 in this area. The number of discrepancies is very small. Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Registry updated where applicable as identified in audit.		21/02/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Add to daily discrepancy reporting so can be actioned daily.		30/04/2022
		Identified

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Dec-20</p> <p>To: 27-Jan-22</p>	<p>Certification cancelled and registry not updated for:</p> <ul style="list-style-type: none"> • 1 installation with insufficient load not monitored, • 6 installations certified as a lower category but not monitored, • 14 installations not fit four purpose due to low burden, • 30 installations without inspections conducted by the due date, • 11 installations with invalid statistical sampling certification, • 19 installations with sum-check failures not remediated within three business days, • 3 ICPs with late inspections, and • 22,547 installations with invalid statistical sampling certification. <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>I have recorded the controls as weak in this area because in most cases, the registry is not populated with the correct expiry date when certification is cancelled. The ICPs with invalid statistical sampling certification have been cancelled for many years without the registry being updated.</p> <p>The issues found can potentially have a high impact on other participants and on settlement. In particular the LMGL meters with invalid statistical sampling certification are likely to have a low level of accuracy and a high failure rate. The audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Working through these and registry updated where we have identified non compliance . Will change expiry date to 10 years for category 2 sites as we are no longer carrying out cat 2 inspections.</p> <p>This was initiated to recertify after 10 years due to Covid-19 preventing Influx from carrying out our inspection program within allocated period.</p>	21/02/2022	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>The majority of ICPs have been cancelled due to ATH errors that are not easily identifiable for an MEP.</p> <p>Disputed - In regard to LMGL, Influx has not been notified by either Delta ATH or the Electricity Authority that certification has been cancelled for several thousand ICPs</p> <p>On acquisition the registry indicated these to be compliant and in dispute.</p> <p>Upating of Influx Data monitoring system and processes</p> <p>Upating of Influx Data monitoring system and processes</p> <p>All category 2 plus sites to be checked by Influx Test House</p>	Ongoing	
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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-Dec-20</p> <p>To: 27-Jan-22</p>	<p>Certification cancelled or expired for 25,379 ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<p>High</p>	<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. The controls for FCLM and TRUM for Category 1 certification appear to be sound but the LMGL controls appear weak and 82% of ICPs have cancelled or expired certification.</p> <p>The impact on settlement is recorded as high because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is high.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>FCLM non compliant meters were reduced from 2,549 to 1,279, over 50% in 2021. We will continue reduce this number and seek exemption for UTI's as per compliance plan.</p> <p>In regard to LMGL, Influx has not been notified by either Delta ATH or the Electricity Authority that certification has been cancelled for several thousand ICPs</p> <p>On acquisition the registry indicated these to be compliant and in dispute.</p>		21/02/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Influx has created a comprehensive compliance plan and submitted with the audit.	Ongoing	
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Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 27-Apr-21 To: 27-Jan-22	Prevailing load test not conducted for one category 1 metering installation. Test results not all recorded for three TRUM installations. 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 because sufficient testing is conducted to ensure the installation is accurate. 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
Organise recertification by test house	31/03/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Notify test houses of obligations in regards to recertifying bridged meters.	30/04/2022	

Certification as a Lower Category		
Non-compliance	Description	
Audit Ref: 7.6 With: Clauses 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7 From: 01-Dec-20 To: 27-Jan-22	Certification cancelled for 7 ICPs where certification as a lower category monitoring is not conducted. Potential impact: Low Actual impact: Low Audit history: None 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 is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Influx data always endeavours to avoid certifying at a lower category . We are following up on how we have increased from 24 sites being compliant in 2021 to 32 in 2022 and 7 as being non compliant. Registry updated to reflect non compliance		30/04/2022
Preventative actions taken to ensure no further issues will occur		Completion date
All category 2 plus sites to be checked by Influx Test House Review Influx certification requirements and clarify with ATHs		30/04/2022
Remedial action status		
Identified		

Insufficient Load for Certification Tests			
Non-compliance	Description		
<p>Audit Ref: 7.7</p> <p>With: Clauses 14(3) and (4) of Schedule 10.7</p> <p>From: 28-Oct-21</p> <p>To: 27-Jan-22</p>	<p>ICP 0003133800AA2B3 was certified on 28/10/21 under the insufficient load clause but monitoring was not conducted. Certification is therefore cancelled</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. Instructions are clear that load should be added by ATHs.</p> <p>The impact on settlement and participants is unknown; therefore, the audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>All category 2 plus sites to be checked by Influx Test House</p> <p>Certification should have an expiry date of 3 months from installation date to ensure follow up .</p> <p>Note monitoring is only required to notify test house to return and do load tests.</p>		30/04/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Review Influx Data certification requirements and clarify with ATHs</p>		30/04/2022	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Dec-20 To: 27-Jan-22	31 meters with time clocks that are not monitored every 12 months. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There isn't a process in place to check the time setting on these meters. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Influx Data has made every endeavour to replace these meters as there is no other option. We have reduced the number from 73 to 31 . Barriers include: <ul style="list-style-type: none"> • 7 customer refusals • 4 Can't locate customer(Vacant) • 14 Dealing with customer issues Influx believe the Breach a risk rating of 5 is excessive.		2021 - 2022
Preventative actions taken to ensure no further issues will occur		Completion date
Seek advice from EA on exemptions as an MEP for ICPs that are UTIs and unable to be made compliant .		30/04/2022
Remedial action status		
Identified		

Compensation Factors			
Non-compliance	Description		
<p>Audit Ref: 7.14</p> <p>With: Clause 24(3) of Schedule 10.7</p> <p>From: 01-May-16</p> <p>To: 25-Jan-22</p>	<p>Incorrect compensation factor for ICP 0000616050WPE6E.</p> <p>Incorrect compensation factors for a further 6 ICPs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is high. At least two ICPs were settled using incorrect compensation factors. Under submission of approx. 200,000 kWh has occurred since 2016.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Participants notified and Registry updated</p> <p>This issue is still under investigation and therefore we can not estimate the impact as it is still unknown.</p>		21/02/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>All category 2 plus sites to be checked by Influx Test House</p> <p>Add to daily discrepancy reporting so can be actioned daily.</p>		30/04/2022	

Interim Certification			
Non-compliance	Description		
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 02-Feb-22	302 FCLM ICPs with expired interim certification. 22,547 LMGL ICPs where most have 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 almost seven 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
FCLM Expired Interim reduced from 702 to 302 planned to complete but UTIs will prevent 100% target. In regard to LMGL, Influx has not been notified by either Delta ATH or the Electricity Authority that certification has been cancelled for several thousand ICPs On acquisition the registry indicated these to be compliant and in dispute		31/12/2022	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
Addressing non compliance as per Compliance plan			

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-Dec-20</p> <p>To: 27-Jan-22</p>	<p>TRUM</p> <p>Inspections not conducted within the allowable window for 14 Category 2 installations.</p> <p>LMGL</p> <p>Inspections not conducted within the allowable window for six Category 2 installations.</p> <p>Potential impact: Medium</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</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
<p>Updated Cat 2 sites as expired</p> <p>No longer completing cat 2 inspections .</p>		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Cat 2 sites to be certified as per updated compliance plan</p>		Ongoing	

Access to Raw Meter Data		
Non-compliance	Description	
Audit Ref: 10.1 With: Clause 1 of Schedule 10.6 From: 01-Dec-21 To: 27-Jan-22	Data provided to one trader is not raw meter data. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because data includes all decimal places provided for a large proportion of ICPs. The impact is assessed to be low, because a small number of ICPs are affected and the issue only affects the third decimal place under certain circumstances.	
Actions taken to resolve the issue	Completion date	Remedial action status
By standardizing to EA recommended EIEP3 format we now breach. Modified file to contain 4 decimal places.	21/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Working with one retailer that cannot receive the new file format . These ICPs are in the process of being transferred to a new Retailer Code	31/12/2022	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Dec-21 To: 31-Dec-21	Clock errors greater than the threshold for 73 ICPs. Potential impact: Low Actual impact: None Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations. The errors were all small and none were across a trading period, therefore there is no impact on participants or settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Time adjusted when identified as outside tolerances	At the time	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Time adjusted when identified as outside tolerances	At the time	