

Compliance Plan for Network Waitaki MEP – March 2022

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-May-20 To: 10-Feb-22	Some 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 as Network Waitaki had updated its processes regarding the bulk updates following statistical recertification. The impact on participants, customers or settlement could be minor where a certification update is late; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Investigated why the updates were late and the effectiveness of our controls.	31/03/22	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
After our review of controls, we updated our processes to prevent this happening again. Refer to files: 05 Replace and Test a Sample of Meters at 15 Years – Process 04 10 Year Meter Inspections process	31/03/22	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-May-20 To: 10-Feb-22	Some incomplete certification records. 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 strong as Network Waitaki had updated certification report template used by its inspectors to include all test results, before this this audit report was finalised. 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
We have reviewed the causes of the incomplete records and checked our controls for effectiveness	31/3/22	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Form amended by Metering Team and forms will be checked for completeness when received. Refer file: 03 NWL Job Sheet v3.0 28Mar2022.pdf	31/3/22	

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-May-20</p> <p>To: 10-Feb-22</p>	<p>Small number of registry discrepancies.</p> <p>Potential impact: Low</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>I have recorded the controls as strong in this area because there were only a small number of issues, most of which are now resolved.</p> <p>Very few of the discrepancies have an impact on participants, customers or settlement. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
WE have amended the incorrect ATH identifier and have been removed by Meridian as MEP for the Benmore Dam supply and have confirmed that the ANSIC codes are correct for the CN only ICPs	31/3/22	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We have received a proposal for review of our data checking scripts to identify any other automated checking we can do to avoid these errors reoccurring. We plan to review this over the next 2 months.	31/3/22	

Cancellation of Certification			
Non-compliance	Description		
Audit Ref: 6.4 With: Clause 6 of Schedule 11.4 From: 01-May-20 To: 10-Mar-22	Certification cancelled, and registry not updated for: - 12 Category 1 ICPs not inspected within maximum inspection period, and - one Cat 2 ICP certified with low burden. 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 Network Waitaki has a regime in place and the missed and late inspections were due to access issues. It is unlikely that the missed inspections will impact on other participants and on settlement. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Certification has been cancelled for these ICPs. Cat 2 metering replaced with Cat 1 metering.		30/3/22	
Preventative actions taken to ensure no further issues will occur		Completion date	Cleared
We have amended our process to make it clear that certification must be cancelled if not inspected by the due date.		31/3/22	

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: 05-Jan-20</p> <p>To: 06-Mar-20</p>	<p>Certification cancelled for:</p> <ul style="list-style-type: none"> - 12 Category 1 ICPs not inspected within maximum inspection period, and - one Cat 2 ICP certified with low burden. <p>Potential impact: High</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>I have recorded the controls as strong because Network Waitaki has a good process in place to identify and recertify installations.</p> <p>The impact on settlement is recorded as low. The likelihood of failure or inaccuracy for metering installations with expired certification is low based on the age and type of meters and previous calibration results for these meters.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have cancelled certification for these meters and included them in the 2022 stat sample group which we are aiming to have recertified by June 2022	31/3/22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have amended our 10 year inspection process to make it clear of the requirements for inspecting within 10.5 year timeframe.	31/3/22	

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 05-Sep-20 To: 11-Jul-21	12 Category 1 metering installations not inspected within the maximum inspection period. 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 Network Waitaki has a regime in place and only 12 inspections were not conducted within the maximum inspection period due to access issues. It is unlikely that the missed inspections will impact on other participants and on settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have cancelled certification for these meters and included them in the 2022 stat sample group which we are aiming to have recertified by June 2022	31/3/22	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
We have amended our 10 year inspection process to make it clear of the requirements for inspecting within 10.5 year timeframe.	31/3/22	