

Compliance plan for SmartCo MEP – 2022

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 14-Jul-21 To: 07-Oct-21	Each services access interface not identified for two metering installations. Potential impact: Medium 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 the ATHs have now adopted processes to record each services access interface. 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
Delta cat 2 certs were updated in August of 2021, the one identified was used prior to then, all certs since state all service access interfaces as required in the code. Similar explanation for AMS test house, certs were updated and officially used in the field in November 2021, the one identified was an older certificate issued prior to Nov 2021. All certs issued since then meet all the code requirements.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Certificates are now correct and contain all information required in the code.	Completed	

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Aug-21 To: 10-Apr-22	Registry not always accurate and not always updated as soon as practicable by SmartCo. Certification records not always accurate. Replacement AMI data only provided for 60 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	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
Work was undertaken during the last audit period with the test houses to correct their certificates to include all relevant information as stated in the code. Good progress was made but we are still not 100% there. SmartCo continues to work with ATH's on these matters through the quarterly ATH forums. The majority of incorrect ATH identifiers is due to the way some ICPs are transitioned in back office systems. We have identified a mapping issue which is now corrected to always map to VCOM. Existing incorrect ATH codes have been corrected in the Registry and reminder sent to staff re; paperwork returns.	20 Dec 2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Actively working with test houses to ensure all required and correct information is included in the certification records.	20 Dec 2022	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Aug-21 To: 10-Apr-22	Some registry updates later than 15 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	Controls are recorded as moderate because there is room to improve the timeliness by ensuring more regular 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
The reason for the percentage compliant is as per last year and primarily due to the SMCO transition program, this is an ongoing process to update ICPs and assets to SMCO owned in our system and the registry.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Aug-21 To: 10-Apr-22	The maximum interrogation cycle is not recorded for each services access interface. 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 majority of design reports have now been updated with the correct maximum interrogation cycles. 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
SmartCo will continue to work with Delta to ensure their design reports are fit for purpose and meet the relevant code requirements, however ATH's must comply with the code so SmartCo part in this is supportive only.	20 Dec 2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Review design documents when they are updated to ensure all required information is included and correct.	20 Dec 2022	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Aug-21 To: 10-Apr-22	Some records updated to the registry later than 10 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	I have recorded the controls as strong because they mitigate risk to an acceptable level. Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Late nominations from traders is still a major issue causing non-compliance to MEPS. 90 updates of the installation type from NHH to HHR and addition of 7304 channel after FSPs had incorrectly recorded as NHH in initial update. Process put in place and staff trained to ensure they check this prior to updating the registry.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We are always looking for ways to improve on this clause.		Ongoing
Remedial action status		
Identified		

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6 From: 01-Aug-21 To: 10-Apr-22	Certification records not accurate and complete in a sample of 50 certification reports. Potential impact: Medium 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 because 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
Improvements were made to the certification report information last audit period after Vector metering (VM) raised the accuracy of certification reports with test houses in our regular test house forums and provided clear requirements of what is required. All test houses are actively improving their reports to ensure the missing or incorrect fields are right going forward and SmartCo will review this going forward to ensure all comply. Two ATHs require system changes to get test results onto the certifications.		20 Dec 2022
Preventative actions taken to ensure no further issues will occur		Completion date
Our regular test house forums are discussing new code requirements and ensuring we are all aware of our obligations.		20 Dec 2022
		Remedial action status
		Investigating

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 1 (1) of Schedule 11.4 From: 15-Sep-21 To: 16-Dec-21	MN file not sent within 10 days for three 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	I have recorded the controls as strong because SmartCo has an automated process in place to accept nominations. 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 discovered an issue in May 2021 where some nomination files from the Registry were not processed fully so rather than accepting the nomination in our system, the files sat awaiting MN acceptance in the Registry. To update the Registry, we had to manually accept the nomination. While most MN are still accepted automatically, we check daily to ensure any that are not accepted, are done manually. As an added level of protection, we recently started running a daily reconciliation file for the registry to catch any updates not performed, and then push the update.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As above, manual checks are done daily and MN's accepted manually if found, also a reconciliation file is run in the background daily as a backstop process.	Completed	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Aug-21 To: 10-Apr-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 because they mitigate risk to an acceptable level. Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The majority of incorrect ATH identifiers is due to the way some ICPs are transitioned in back office systems. We have identified a mapping issue which is now corrected to always map to VCOM. Existing incorrect ATH codes have been corrected in the Registry and reminder sent to staff re; paperwork returns. The 46 ICPs in question have been corrected to VCOM. UN only with a control device can be a valid combination when the LCD is a network device measuring energy quality, such as on the Wel Network who require one of their devices on each ICP for collecting network information.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Invalid ATH identifier cleared now. LCDs on UN sites cannot be avoided on some networks such as Wel Networks, who require their load control device on each ICP to monitor network energy.	Completed	

Correction of Errors in Registry			
Non-compliance	Description		
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Aug-21 To: 10-Apr-22	Discrepancies not resolved within five 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	I have recorded the controls as strong because there is a thorough process to identify errors and steps are taken to correct errors as quickly as possible. Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have a thorough process where we reconcile data between our systems and the Registry daily, however some updates still occur after 5 days, most often this is due to reliance on third parties for additional information.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to reconcile daily and update within the required timeframes. Chase those cases where third parties are requested for information.		Ongoing	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Aug-21</p> <p>To: 10-Apr-22</p>	<p>Certification cancelled, and registry not updated within 10 business days for:</p> <ul style="list-style-type: none"> - 1,676 Category 1 ICPs with minimum number of sample inspections not conducted, - six ICPs where sum-check failures were not resolved within three business days, - an unknown number of ICPs where sum-check failures were not resolved within three business days prior to implementation of cancellation process. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 in this area because most processes are managed with sufficient controls to avoid cancellation of certification.</p> <p>The responsibility for SmartCo 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.</p>	
Actions taken to resolve the issue		Completion date
<p>Missing inspections was an unintended mistake due to not fully understanding a code change that was made back in 2021. The SmartCo inspection process was not updated to ensure the population for inspections was taken from the 31 December of the year in which the list was created. This has been corrected for 2022. We will now focus on correcting the 1,676 ICPs that were missed.</p> <p>The sumcheck process, another that was changed in 2021, took a long time to change our systems and create a process. Whilst we cannot explain exactly why the 6 identified above were not updated in the Registry within the 10 days, they were all cancelled but there was a disconnect between the teams as to the time frames, and they were missed. This miscommunication has been shared with the teams and they are now aware.</p>		20 Dec 2022
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Inspections process has been updated for 2022.</p> <p>Sumcheck process link failure that ensures cancelled ICPs are updated in the registry has been identified and process improved.</p>		Completed
<p>Remedial action status</p> <p>Identified</p>		

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a) From: 01-Aug-21 To: 10-Apr-22	Certification expired or cancelled for more than 1,682 ICPs. Potential impact: High 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 the SmartCo processes have been improved to avoid cancellation of certification. The impact on settlement is recorded as low because it is unlikely that there are accuracy issues with the metering installations with cancelled certification, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The majority of the above cancelled ICPs are in planning to be recertified this year (2022) using a statistical sampling process. This is due to get underway in the field in August once customers have been notified and technicians workloads planned. The category 2 ICPs are being managed as 'Business as usual' jobs.		20 Dec 2022
Preventative actions taken to ensure no further issues will occur		Completion date
We strive to ensure metering installations always remain certified, however from time to time we are made aware of issues that lead to cancellation of metering installations. We continue to improve systems and processes to minimize these.		Ongoing
Remedial action status		
Identified		

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) From: 01-Dec-21 To: 01-Jun-22	Prevailing load tests not conducted for two Category 1 metering installations. Potential impact: Medium 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 as ATH processes ensure that testing requirements are met in most scenarios but there is room for improvement. 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
The two ICPs in question moved a meter from a builder's temporary supply to a permanent installation. The Wells installation physically moved the meter to a new box, this was treated as a new installation and the relevant new installation tests were performed. Cert expiry remained as it was because the meter had been initially certified as BTS. The AMS job didn't move the meter but modifications were done cancelling the BTS cert. This was also treated as a new installation and the correct tests completed. We do not believe a prevailing load is required in this situation and would like a ruling from the Authority on this clause and the intent.	Ongoing	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Where we believe prevailing load test is required, our policy is to replace meters as the test houses do not have provision of expensive equipment to undertake this testing.	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Aug-21 To: 10-Apr-22	38 ICPs with time dependent meter registers with time are not monitored every 12 months. Potential impact: Low Actual impact: Low 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 as SmartCo has the capability to identify this, but regular monitoring has not taken place. 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
We will discuss how we best address this and what will work. This could be anything from replacing the meter at the 12-month period or suggesting the retailer change the tariff from one that has time switched registers.	20 Dec 2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Once we have arrived at a solution, we will look to implement it to ensure no meters with time dependent meter registers that are not monitored, remain.	20 Dec 2022	

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 01-Jan-21 To: 31-Dec-21	Incorrect sample size inspected for Category 1 sample inspections. Potential impact: 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 SmartCo has updated its processes to ensure that the correct sample size will be selected in future inspections. 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
Missing inspections was an unintended mistake due to not fully understanding a code change that was made back in 2021. The SmartCo inspection process was not updated to ensure the population for inspections was taken from the 31 December of the year in which the list was created. This has been corrected for 2022. We will now focus on recertifying the 1,676 ICPs that were missed. We discuss this non-compliance further in the participant response section at the end of this report.	20 Dec 2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Our process has been updated for the 2022 inspections.	Completed	

Timeframe for correct defects and inaccuracies		
Non-compliance	Description	
Audit Ref: 9.4 With: Clause 46A From: 11-Apr-22 To: 04-May-22	Remedial action not completed in required timeframe after notification of a faulty metering installation for one ICP. 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 the SmartCo process normally ensures that remedial action is completed in the required timeframe. The impact on settlement and participants is minor as only one Category 1 ICP is affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We endeavour to remediate bridged sites as soon as possible. We have a robust system that monitors these daily and proactively chases up outstanding ones. Sometimes this is not possible due to various reasons including Covid-19 or access restrictions.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
As stated above, we have a robust system that monitors these daily and proactively chases up outstanding ones.		Completed
Cleared		

Meter bridging		
Non-compliance	Description	
Audit Ref: 9.5 With: Clause 10.33C From: 22-Feb-22 To: 04-May-22	Meters not reinstated after bridging within five business days of bridging for two Category 1 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	I have recorded the controls as strong as the SmartCo process normally ensures that remedial action is completed in the required timeframe. The impact on settlement and participants is minor as only two Category 1 ICPs are affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Clause 10.33C (6) states the metering equipment provider, after receiving the notice from the trader must reinstate the meter so that all electricity flowing into the ICP flows through a certified metering installation within 5 business days. Whilst we endeavour to and regularly meet this timeframe, due to circumstances outside our control, we are sometimes unable meet this.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
ICPs have both been unbridged and recertified. Our process monitors this closely but sometimes delays out of our control cannot be avoided.	Completed	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Aug-21 To: 10-Apr-22	343 examples of clock errors outside the allowable thresholds. Potential impact: Medium Actual impact: Low Audit history: Twice 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
Our system automatically corrects clock errors and the majority do not drift outside the code limits. If any do drift outside the limit they are corrected but we become non-compliant. Any meters with excessive time errors or are repeatedly exceeding the time limits are investigated by the technical team and action is taken to resolve the issue.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
We have an automated system of correcting time errors. Should the time drift exceed the limits in the Code excessively or repeatedly, we will attempt to manually interrogate and make the necessary correction, and if unsuccessful, will replace the meter.		Completed
Remedial action status		
Identified		