

Compliance plan for Ventia MEP 2022

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11.2 and Clause 10.6 From: 01-Dec-20 To: 02-Nov-21	All practicable steps have not been taken to ensure information is complete and accurate. Potential impact: Medium Actual impact: Medium Audit history: Three times Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as weak because they will not ensure errors are mitigated. The impact is medium. Mainly because installation accuracy cannot be confirmed without testing being completed.	
Actions taken to resolve the issue		Completion date
See comments in each section below		
Preventative actions taken to ensure no further issues will occur		Completion date
See comments in each section below		
		Remedial action status
		Unknown

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Dec-20 To: 21-Dec-21	Design reports not recorded in 15 certification reports. Design reports do not include all relevant details. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls require strengthening to ensure design reports are accurate and compliant. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Same as AccuCal, we use our certification check sheet as our design report. We will make sure from now on to fill in the box that says design report ID	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Same as AccuCal, we use our certification check sheet as our design report. We will make sure from now on to fill in the box that says design report ID	Completed	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Dec-20 To: 02-Nov-21	Records updated on the registry later than 10 business days. 9 of 18 event dates incorrect. 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 as there is room for improvement. The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
There was a lot of updates that happened as part of our registry comparison programme which showed the sites that needed to be corrected to display accurate information. The corrections have now been completed to match our records.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Quite often the late updates are due to Test houses taking longer than 10 days to send us the site report and certificate, so there is no way we can update the registry that quickly in those instances. We will attempt to have all Ventia reports processed within the timeframe and limit the use of other test houses		

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6 From: 01-Feb-21 To: 22-Dec-21	Some incorrect certification report fields. 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	Remedial action status
<ul style="list-style-type: none"> We have multi purpose documents, which is both a certification report and the design report The references to Broadspectrum and Transfield services will remain for some time as the company is using a soft changeover and these references will be changed in due course. Recording CT burden certification range is an oversight on our part. 		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Our Ventia Test House will modify their CT Calibration/certification reports to include the CT burden certification range.		

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-Dec-20</p> <p>To: 02-Nov-21</p>	<p>Incorrect registry information.</p> <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 as there is room for improvement.</p> <p>The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Having correct registry information is important, but it becomes a no win situation when you get black marks for updating the registry for errors and also when updating after work has been completed and you have been waiting for the paper work.</p> <p>The reports for the sites are from VirCom EMS not Vector AMS, hence their registry ATH identifier should be VEMS not VCOM.</p>		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	Auditor comment:
<p>We have re-read the event date in the registry, now we realise we had some confusion as to what the event date was and will input the correct date from now on.</p>		<p>Vircom EMS (VEMS) is no longer a participant. The ATH was purchased by Advanced Metering Services Limited (VCOM)</p>

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 14-Dec-18</p> <p>To: 22-Dec-21</p>	<p>Certification cancelled, and registry not updated for three installations with low burden, two of which were not monitored for certification as a lower category.</p> <p>Certification is cancelled, and the registry not updated for one installation with insufficient load certification where monitoring was not conducted.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as weak because the issues raised have been raised in three audits now and have not been addressed.</p> <p>The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>My understanding of the comparative certification clause is that you are not certifying the CTs but you are certifying the whole installation by completing an end to end load run. Therefore the meter has to be calibrated and certified, The CTs however only have to be fit for service, in their installed conditions. The CTs are proved to be fit for service (as installed regardless of burden) by the end to end load run. Therefore the certification is not cancelled.</p> <p>Some certifications were reissued to typographical errors, and not because there was an issue with the metering installation, so the previously completed certification checks were used.</p> <p>See 7.7 below</p>		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	

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: 14-Dec-18</p> <p>To: 22-Dec-21</p>	<p>Certification cancelled for four ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</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 as there is now a process to ensure expired certification is identified and recertified. There is room to improve processes regarding cancelled certification.</p> <p>The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>See 6.4 and 7.7</p> <p>The site has now been recertified pending load run and to be monitored. As there still was no load during the site visit it was added to our monitoring list to check when a load run can be done.</p>		
Preventative actions taken to ensure no further issues will occur		Completion date

Disputed

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) From: 21-Jan-21 To: 22-Dec-21	Certification tests not conducted for two installations. Register advance test not conducted for one installation. Potential impact: High Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as moderate because certification tests are conducted in most instances. The impact is considered medium because if the installations had issues they would not be identified; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
See 6.4 and 9.1 below		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
See 6.4 and 9.1 below		

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: 16-Aug-21</p> <p>To: 22-Dec-21</p>	<p>Insufficient load monitoring not conducted for ICP 0007185578RN7F8.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls require strengthening to identify installations certified with insufficient load to ensure they are added to the monitoring list.</p> <p>A recent report shows the load hasn't increased; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The Ventia MEP has added this installation to the monitoring list, and the installation recertified after completion of an onsite inspection.	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
While we have completed the above actions, to dot the l's and cross the t's it was known that there would be no load on this installation due to the downstream site configuration.	Complete	

Investigation of Faulty Metering Installations		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 31-Jul-21 To: 22-Dec-21	Faulty register on meter at installation #2 at ICP 0800616065LCAA9 considered defective and not fit for purpose. Investigation not conducted within 5 business days. 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 is low because the data used for settlement is accurate; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The Ventia MEP and ATH does not regard this metering installation as defective or not fit for purpose, as the installation is metering correctly and providing accurate data to the retailer.		No Action required
Preventative actions taken to ensure no further issues will occur		Completion date
No action required as the installation mention is not regarded as being defective, we will however look into why the display is locked.		No Action required
		Disputed