

<p>NGCM - Test houses now have the correct information and we continue to work with them to ensure certificates are complete and accurate.</p>	<p>30 November 2021</p>	
<p>AMCI – The Vector Metering TOU C&I team check this field on all paperwork during Q&A checks</p>	<p>18 October 2021</p>	

Participants to Provide Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Mar-21 To: 15-Sep-21</p>	<p>NGCM Some certification reports not complete and accurate.</p> <p>AMCI and NGCM Registry not always updated as soon as practicable. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Medium</p>	<p>Controls are recorded as moderate because there is room to improve the timeliness of registry updates and the accuracy of certification records.</p> <p>The impact on other participants could be moderate due to the use of potentially incorrect data, thinking it is correct; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>NGCM - Vector have been working with the test houses to ensure all the required information is captured in the certification records.</p> <p>On 14 July we sent the test houses a table outlining all the certification requirements, we catch up every month with the test houses and this is one topic of conversation we will continue to have until they get their certificates correct.</p> <p>We (Vector metering) have recently updated our design reports and these now include all service access interfaces with maximum interrogation cycles. These design reports were sent to all test houses in July this year for review and approval, and following feedback, have been further updated and redistributed for approval.</p> <p>As stated in the auditor’s summary “cancellation of certification is now occurring in a more-timely manner. We have made improvements to our process for cancelling metering installations when we become aware of them. Unfortunately, in this audit a small number snuck through, we will continue to tweak this process to eliminate these in the future.</p> <p>AMCI – We administer Registry corrections through our Servicemax Registry Exception Case Management system – this is done daily. We also administer a monthly exception report from the Registry</p>	<p>30 November 2021</p> <p>Ongoing</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>NGCM - Test houses now have the correct information and we have and will continue to work with them to ensure certificates are complete and accurate.</p> <p>AMCI – We have added some additional reporting to the mix but we are sometimes hampered from a resourcing perspective to catch and review all exceptions. We have an ongoing process improvement programme in place to resolve these challenges</p>	<p>30 November 2021</p> <p>Ongoing</p>	

Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-Feb-21</p> <p>To: 04-Aug-21</p>	<p>AMCI and NGCM</p> <p>Some registry updates later than 15 business days.</p> <p>Potential impact: Medium</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>Controls are in place to ensure the timeliness of updates, but Vector Metering is often prevented from updating the registry due to late field notification.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM – As the auditor stated, the level of compliance has improved significantly since the last audit, some of this will be due to fewer backdates required or other projects that bring the percentage of late registry updates down. We continue to track late nominations weekly and push retailers to fulfil their obligations before we are in breach.</p> <p>AMCI – AMCI continue to monitor and push the FSPs to deliver paperwork in a timely fashion. We currently have a 5BD paperwork delivery target from FSP to AMCI – currently the FSPs are providing paperwork in 4.98Bds. AMCI also continues to request MEP nominations with Retailer SRs.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NGCM – As we said in the last audit, we expect our compliance level to improve as we continue to correct metering data, this is proving to be correct, however there is always room for improvement so we will continue to tweak our processes.</p> <p>AMCI – We are creating pre-emptive reporting which will highlight ICPs before we reach the 15BD cut-off. We have implemented an improved MEP nomination acceptance process which will ensure the Registry is ready for metering information earlier.</p>	Ongoing	

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Feb-21 To: 15-Sep-21	NGCM Design reports do not include all relevant information as specified in the Code. Potential impact: Low 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 NGCM has prepared a new standard design report. 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
We have recently updated our design reports, and these included the required code information except for the two items identified above. We have updated the design reports and will redistribute for ATH approval.	30 November 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Updated design reports will be sent out for approval in October, aiming to have ready for use by end of November.	30 November 2021	

Net metering and Subtractive Metering		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 4(2)(a) of Schedule 10.7</p> <p>From: 01-Oct-18</p> <p>To: 15-Sep-21</p>	<p>AMCI</p> <p>Subtraction is used in a metering installation.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong as this situation is a one-off case caused by the unique design of the HV supply to the customer.</p> <p>The impact on other participants is low as the situation was identified and a process implemented to ensure that submission volumes are correct; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
AMCI – Full upgrade project is underway that will resolve the issue reported on ICP1002050361LC60D – brand new 11kV supply which will leave the old 11kV supply redundant remedying the double metering issue	In progress	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
AMCI – HV projects are checked prior to any metering work is installed to mitigate situations where upgrades and site extension could lead to double metering requiring subtraction – in some cases due to the complexity of the site having 100% certainty that an issue may not arise is difficult but we do complete a standalone metering design report that all parties have to sign-off on.	In progress	

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-Feb-21</p> <p>To: 04-Aug-21</p>	<p>NGCM and AMCI</p> <p>Some records updated to the registry later than 10 business days.</p> <p>Potential impact: Medium</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 there is room for improvement.</p> <p>Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM - NGCM is meeting these requirements by over 90% for recertified installations and in excess of 97% for new connections. Majority of late updates are due to late nomination from the retailers which we chase up weekly.</p> <p>In May this year we discovered an internal issue where the registry nomination file was not processed fully and rather than automatically accepting the nomination and creating nom history in our system, the sites sat awaiting MN acceptance in the registry.</p> <p>In order to update the registry we had to manually accept the MEP nomination in the registry. This issue is ongoing and has been escalated within Vector and is currently sitting with an architect to resolve.</p> <p>We are actively looking for new examples daily which are corrected manually which will help prevent registry update delays.</p> <p>AMCI – This remains a key focus area as we monitor field work and delivery of paperwork from field to testhouse to MEP- delivery has improved to under 5BDs in general – we have some work to do to get updates to the Registry from when paperwork is provided to the MEP</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>NGCM - We actively look for new examples daily, these are corrected manually which will help prevent registry update delays.</p> <p>Continue to monitor for late retailer nominations and chase weekly.</p> <p>AMCI – We run paperwork delivery stats, run a daily MEP nomination report to make sure we have been nominated and we are also working towards quicker turn-around time to process completed work and paperwork for delivery to the Registry</p>	Ongoing	
---	---------	--

Accurate and Complete Records		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1) of Schedule 10.6</p> <p>From: 01-Feb-21</p> <p>To: 04-Aug-21</p>	<p>NGCM and AMCI</p> <p>Some inaccurate certification records.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>I have recorded the controls as moderate because instruction has been provided to ATHs, but there is further work to be done.</p> <p>There is a minor impact on other participants; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>NGCM - Vector have been working with the test houses to ensure all the required information is captured in the certification records.</p> <p>On 14 July we sent the test houses a table outlining all the certification requirements, we catch up every month with the test houses and this is one topic of conversation we will continue to have until they get their certifications correct.</p> <p>We (Vector metering) have recently updated our design reports and these now include all service access interfaces with maximum interrogation cycles. These design reports were sent to all test houses in July this year for review and approval, following some feedback have been updated and resent for approval.</p> <p>AMCI – Intellihub and Delta have been advised of the correct SAI to use for C&I TOU. Vector Metering is currently working with our metering supplier and the AHS to come up with the most appropriate MIC for TOU. CAT 2 certification going forward will have no expiry dates for CTs comparatively tested.</p>	Ongoing	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	
<p>NGCM - Continue to work with test houses until they have corrected their certificates.</p> <p>AMCI – Ongoing monitoring of certification information as part of our Q&A process prior to submission to the Registry</p>	Ongoing	

MEP Response to Switch Notification		
Non-compliance	Description	
<p>Audit Ref: 6.1</p> <p>With: 1(1) of Schedule 11.4</p> <p>From: 01-Feb-21</p> <p>To: 25-Sep-21</p>	<p>NGCM</p> <p>194 late MN files.</p> <p>AMCI</p> <p>95 late MN files.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong as AMCI has put reporting in place to identify nominations. NGCM's process is normally automated, and it appears there was a one-off issue leading to late acceptances.</p> <p>The impact is low; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM - In May this year we discovered an internal issue where the registry nomination file was not processed fully and rather than automatically accepting the nomination and creating nom history in our system, the sites sat awaiting MN acceptance in the registry.</p> <p>In order to update the registry we had to manually accept the MEP nomination. This issue is ongoing and has been escalated within Vector and is currently sitting with our system Architect team to resolve.</p> <p>We are actively looking for new examples daily which are corrected manually, this will help prevent registry update delays.</p> <p>AMCI – We have updated all unactioned nominations.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NGCM - We actively look for new examples daily, these are corrected manually, and this will help prevent registry update delays.</p> <p>We continue to monitor for late retailer nominations and chase weekly.</p> <p>AMCI – A daily MEP report of unactioned MEP nominations is used to approve new MEP nominations – we believe this will resolve this issue fully</p>	Ongoing	

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-Feb-21</p> <p>To: 04-Aug-21</p>	<p>NGCM and AMCI</p> <p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</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. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
		Remedial action status

<p>NGCM - We continually review these but due to age and access we are unable to update some of these until we can get to site, upgrade the metering, and recertify.</p> <p>Residential (CN only) and Cat 2 without CTs: A significant number are old interim certified. Although we have tried multiple times in some cases, we are unable to access the site to identify the equipment on site and upgrade the meter.</p> <p>As stated in section 7.1, we have launched a new program called 'Fantail' which, with the support of a major retailer, is investigating new ways to gain access and upgrade these old meters.</p> <p>No control device for register content requiring a control device: These are also old expired interim legacy meters where we have been unable to get accurate information on LCDs, particularly where they are owned by the Network.</p> <p>Control device installed, register content UN: Whilst this report identifies a potential error, it does not necessarily mean there is a non-compliance. It does not take into account that some of these sites may be correct and the LCD is disconnected but remains on site (i.e. switched to gas hot water).</p> <p>AMCI – MEP is currently updating all records that show as non-compliant in the Registry yet the ICPs are certified – a system issue was preventing the new certification from being lodged into the Registry. We had also found some user mistakes in that the wrong ATH was selected during Q&A in our system and hence incorrect information was sent to the Registry.</p>	Ongoing	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	
<p>NGCM - We run the new compliance reports from the Registry monthly alongside our current reconciliation reports to ensure we are capturing the above discrepancies and correcting them.</p> <p>AMCI – We are currently using a monthly report similar to the reporting the EA auditors runs for the MEP audit to continually improve record updates to the Registry, this additional measure is starting to pay off.</p>	Ongoing	

Correction of Errors in Registry		
Non-compliance	Description	
<p>Audit Ref: 6.3</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Feb-21</p> <p>To: 15-Sep-21</p>	<p>NGCM and AMCI</p> <p>Discrepancies not resolved within 5 business days.</p> <p>Potential impact: Medium</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. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM - We constantly reconcile the Registry and our back-office systems and update discrepancies. However, some of these are difficult to resolve, particularly where it involves third parties, and do not happen within the 5 days stipulated. We endeavor to meet this timeframe and continue to look for ways to improve the timeliness of updates.</p> <p>AMCI – Daily and monthly reconciliation is done. Daily exception cases are managed to catch mistakes. In some cases, human error results in inaccurate data to the Registry</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NGCM - We continue to look at ways to improve our processes so we can meet the 5BD requirement</p> <p>AMCI – Additional Registry reporting is being run to highlight problem areas so we can look at additional measures as part of a preventative approach</p>	Ongoing	

Cancellation of Certification			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Feb-21</p> <p>To: 25-Sep-21</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> • AMCI - 31 installations with inspection not conducted, • NGCM – 1 Category 2 installation with overdue inspection, • NGCM - 3 installations with low burden, • NGCM – 1 installation not recertified after bridging, • AMCI - 12 installations with low burden, • AMCI – monitoring not conducted for one metering installation certified at a lower category, and • AMCI – 2 faulty metering installations outside applicable accuracy tolerances. <p>Potential impact: Medium</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. NGCM’s processes for cancellation of certification have been strengthened during the audit period and there are only a small number of ICPs outstanding. For AMCI, many of the examples found were present during previous audits and risks are not being mitigated.</p> <p>The issues found can all potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NGCM - We have made progress in this area and have actively been cancelling ICPs where identified, in a timely manner.</p> <p>We have managed to reduce the number of ICPs not cancelled in the registry by 99% since last audit however still a few slipping through undetected. We will continue to tighten our processes to ensure we capture these going forward.</p> <p>Those identified are in the process of being cancelled and recertified.</p> <p>AMCI – All ICPs listed with certification issues are followed up and certifications cancelled. We endeavour to cancel certification as part of our Q&A process but we still missing some ICPs here and there. We have implemented certification cancellation for all the areas as advised is necessary by the Code. Better implementation is required.</p>		30 Nov 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>NGCM - We will continue to tighten our processes to ensure we capture these going forward.</p> <p>AMCI – Refresher training has been provided for all staff administering certification Q&A.</p>	Ongoing	
---	---------	--

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: 12-Aug-14</p> <p>To: 11-Jan-21</p>	<p>NGCM</p> <p>Certification expired or cancelled for 33,222 NGCM metering installations.</p> <p>AMCI</p> <p>Certification expired for 136 AMCI metering installations.</p> <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	
<p>Medium</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.</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. The audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>NGCM – Around 2/3 of the 33,222 metering installations are expired interim certified installations that we have been trying unsuccessfully for several years to upgrade. A new project was launched in November last year called ‘Fantail’ in which some retailers are working closely with Vector metering to revisit and come up with new ways to tackle some of these old access issues. We are having some success displacing these old meters and are investigating other ideas.</p> <p>The 10,536 previously fully certified metering installations fall into three buckets, around half are part of a Category 1 population that was successfully statistically sampled in April 2015 and given an additional 5 years certification, which expired in 2020. Recertification using a statistical sampling process is currently in progress and is expected to be completed by February 2022.</p> <p>Another approx. 2,300 Category 1 metering installations are due to sites not interrogated within the maximum interrogation cycle and did not have their AMI flag changed to ‘N’ prior to 1 February 2021 when the new changes were introduced. Planning is underway to have this group recertified using statistical sampling and again is expected to be completed by end of February 2022.</p> <p>The 2,069 Category 2 installations were cancelled because they had a 15-year certification (certified prior to August 2013 Part 10 introduction) and were not inspected at 10 years + 6 months. These are being recertified as part of business as usual but field resource and category 2 meter supplies were effected due to Covid 19. These delays have put us on the back foot, and we are trying our best to catch up. We expect this will happen in the first quarter of 2022.</p> <p>The remaining approx. 700 cat 1 installations are being reviewed by our team to ensure the certification dates are correct. Vector Metering did not start installing smart metering until 2008 so these should not have expired yet, we are checking our records first before adding these to a statistical sample project.</p> <p>AMCI – We operate a non-compliance rate of 0.7% of our total base with a consistent level of non-compliance and good controls. We have an issue whereby we finding new certification is not making it to the Registry due to a systems issue. We are working on resolving that at the moment.</p>	Ongoing	Investigating
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	

<p>NGCM - Continuing to work with participants to recertify these ICPs as fast as we can.</p> <p>AMCI – For all non-compliant ICPs AMCI has action in place to resolve but we have dependencies on ATH resources, MEO reluctance to support the programme, Retailers neglecting responsibility, customers unwilling or unable to provide access or shutdowns, Covid 19 has and is having an impact as well</p>	Ongoing	
--	---------	--

Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.2</p> <p>With: Clause 10.38(b) and clause 9 of Schedule 10.6</p> <p>From: 01-Feb-21</p> <p>To: 25-Sep-21</p>	<p>NGCM</p> <p>Some certification tests not conducted by ATHs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are recorded as strong because the main test not conducted is prevailing load using a working standard to recertify an installation with existing components. Other testing confirms the integrity of the installation, and the industry has the view that this test is not required.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>NGCM - Some test house reports do not capture testing from the field so we have informed the relevant test houses and are working with them to ensure their certificates can incorporate this information. For a couple of test houses, this will require system changes which may take some time.</p> <p>The issue of conducting prevailing load using a working standard is a much bigger problem for the industry due mainly to the cost of working standards. Typical cost for a working standard is around \$10,000 each and these are only ever given to technicians who are trained and work on category 2 and above. Cost to provide each Cat 1 technician with a working standard would be upward of \$1 million dollars. Another way is to provide each with a calibrated meter but there are still significant costs with this, for example, cost of meter, annual calibration, time taken on job for technician to wire into installation during testing.</p> <p>We could decide to replace every meter when this scenario comes around but once again this is unnecessary cost, particularly if the meter is recently installed and certified.</p> <p>We are still investigating our options and the best way to approach this and would appreciate some discussion with the Authority on this matter.</p>	Ongoing	Investigating
<p align="center">Preventative actions taken to ensure no further issues will occur</p>	<p align="center">Completion date</p>	
<p>NGCM - Continuing to work with test houses to get certification reports correct and displaying all the required information.</p>	Ongoing	

Non-compliance		Description	
<p>Audit Ref: 7.6</p> <p>With: Clause 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7</p> <p>From: 01-Jun-21</p> <p>To: 15-Sep-21</p>	<p>AMCI</p> <p>Monitoring not conducted for one metering installation certified at a lower category.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 2</p>		
Audit risk rating		Rationale for audit risk rating	
Low		<p>The controls are recorded as strong because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date	Remedial action status
AMCI – A good monitoring process is in place. The example highlighted in the audit was missed during Q&A		Completed	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
AMCI – Refresher training has ben provided to the AMCI operational team		Ongoing	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 25-Sep-21	NGCM 22,679 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. The audit risk rating is recorded as medium.	
Actions taken to resolve the issue		Completion date
NGCM – There are 22,679 metering installations with expired interim certified installations that we have been trying unsuccessfully for several years to upgrade. A new project was launched in November last year called ‘Fantail’ in which some retailers are working closely with Vector metering to revisit and come up with new ways to tackle some of these old access issues. So far, we are having some success with more ideas and trials taking place.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
NGCM - Continuing to work with other industry participants to identify ways of tackling some of these long outstanding issues, revisiting various HSE and customers access issues.		Ongoing
Investigating		

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-Mar-20</p> <p>To: 11-Jan-21</p>	<p>NGCM</p> <p>166 NGCM installations with inspection not conducted.</p> <p>AMCI</p> <p>43 AMCI installations with inspection not conducted.</p> <p>Potential impact: Medium</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 for NGCM because reporting is in place but three ICPs were overlooked. AMCI's inspection controls are rated as moderate because there is a regime in place and only a small number were outside the window.</p> <p>The issues found can potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM – NGCM does not intend to conduct inspections for Category 2 metering installations because the inspection period is the same as the certification period and we will replace the metering at 10 years. There are 166 metering installations that weren't inspected, therefore certification was cancelled on 23 August.</p> <p>AMCI – Our current process includes cancellation of the certification when we do Q&A. we need to do a check that the cancellation information is making it to the Registry as we have highlighted an issue from a system's perspective</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
AMCI – Review is underway as our cancellation process has been well underway during this audit period	Ongoing	

Time Errors for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.7</p> <p>With: Clause 8(4) of Schedule 10.6</p> <p>From: 25-Aug-21</p> <p>To: 25-Aug-21</p>	<p>NGCM</p> <p>409 examples of clock errors outside the allowable thresholds in the most recent reports.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM - Our system automatically corrects clock errors at each interrogation, Time errors greater than 3 seconds are corrected but unfortunately, a small number creep out of the time limits stated in the code and we become non-compliant.</p> <p>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.</p> <p>Overall number is down from last audit.</p>	Ongoing	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	
<p>NGCM - 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.</p>	Ongoing	