

## Compliance plan for AMS MEP – 2021

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 24-Mar-20 To: 30-Nov-20	<b>AMCI</b> Services access interface incorrectly recorded in certification records for four metering installations. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as strong as the services access interface is recorded correctly in most cases. 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
Vircom uses Delta as an FSP and ATH for some AMCI work. I have requested Vircom to advise Delta to utilize SAI – LOCAL going forward.	23/03/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
To be checked by the AMCI operations team during cert QA checks.	23/03/2021	

Participants to Provide Accurate Information			
Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: Clause 11.2 and Clause 10.6</p> <p>From: 01-Mar-20</p> <p>To: 28-Feb-21</p>	<p><b>NGCM</b></p> <p>Some certification reports not complete and accurate.</p> <p><b>AMCI and NGCM</b></p> <p>Registry not always updated as soon as practicable.</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		
<b>Medium</b>	<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 Metering will be presenting the new Code changes to all ATHs at our technical forum in April 2021. This has the express purpose of ensuring all test houses understand what is required in certification and design reports, including improvements that can be made.</p> <p>Vector Metering runs a continuous reconciliation program to ensure information between our system and the Registry is in alignment. We have been producing the ‘Audit Compliance’ reports each month, and our MEP team is working to clear discrepancies and errors.</p> <p>We have been actively cancelling certifications when the above issues are identified, but there is still room for improvement. We have made progress on the items raised and discussed in section 6 of this report.</p> <p>AMCI – Vector Metering runs an additional reconciliation report out of the Registry each month to pick up inaccuracies. This is in addition to the existing Registry Case Exception handling process and monthly Servicemax vs Registry exception reporting and data corrections. We are continually updating the Registry but do not always achieve this ‘asap’.</p> <p>Whilst we believe we are mostly compliant in this area, we do accept there is room for improvement. Exception cases from the Registry for data inaccuracies are monitored and corrected daily.</p>		<p>NGCM – 31/05/2021</p> <p>AMCI - Ongoing</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>NGCM – once the new Code changes are reflected in the certification reports, this non-compliance will be cleared.</p> <p>AMCI - Additional monthly checks have been put in place.</p>	Ongoing	
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Registry Notification of Metering Records		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-Mar-20</p> <p>To: 11-Jan-21</p>	<p><b>AMCI and NGCM</b></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	
<b>Low</b>	<p>Controls are in place to ensure the timeliness of updates, but AMS 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 – Although there were fewer backdates and other projects to bring the percentage of late registry updates down this year, we continue to correct discrepancies and errors, which are often backdated, causing these to look like late updates.</p> <p>AMCI – AMCI continues 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 6BDs. AMCI also continues to request MEP nominations with Retailer SRs. We endeavour to improve on our overall SLAs. A contributing factor to non-compliance is the loss of sub-contractor resources in key areas due to injury or retirement.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>NGCM – As we continue to correct metering data (excluding large correction or projects that might be disruptive), we expect our compliance level to improve.</p> <p>AMCI - FSPs' current resource restructures are under way to aid with Vector Metering's 4G project. This will also support quicker transition of paperwork from the field to the ATH and the MEP back office.</p>	Ongoing	
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Design Reports for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 2 of Schedule 10.7</p> <p>From: 01-Feb-21</p> <p>To: 20-Mar-21</p>	<p><b>NGCM</b></p> <p>Design reports do not include the maximum interrogation cycle for each services access interface.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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><b>Low</b></p>	<p>Strong controls are in place to ensure design reports are accurate. There was a very short time period to change design reports and have them approved between mid-December 2020 and the date of the audit.</p> <p>There is no impact because the maximum interrogation cycles are not derived from the design reports.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NGCM - Vector Metering will be presenting the new Code changes to all ATHs at our technical forum in April 2021. This has the express purpose of ensuring all test houses understand what is required in certification and design reports, including improvements that can be made.</p>	31/05/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NGCM – once the new Code changes are reflected in the certification reports, this non-compliance will be cleared.</p>	31/05/2021	

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: 24-Feb-21</p>	<p><b>AMCI</b></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: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as moderate 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
<p>AMCI – Pioneer has escalated the outstanding issue with their Customer (large hospital). The Customer is looking at further upgrading the old supply which will resolve the subtraction metering issue. Vector Networks has advised that the upgrade may be a few years away. AMCI has provided, via our high voltage test house AccuCal, a metering solution for the current double metering issue. AMCI will be looking at what further action we need to take as the MEP based on the advice that the upgrade will not be happening anytime soon.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>AMCI – Due to the nature of the Customer (large hospital), AMCI has taken a mindful and careful approach in pushing the Customer to provide an opportunity to correct the issue. With Pioneer escalating the outstanding issue, AMCI was hoping we would get a faster resolution but action on any upgrade is beyond the MEP's control.</p>	Ongoing	

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-Mar-20</p> <p>To: 11-Jan-21</p>	<p><b>NGCM and AMCI</b></p> <p>Some records updated to the registry later than 10 business days.</p> <p><b>NGCM</b></p> <p>Processes and reporting not in place to ensure the AMI field is updated within 10 business days of unsuccessful interrogation.</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	
<b>Low</b>	<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 – The majority of the corrections were due to changes (and backdating) of the period of availability from IN24 to the correct POA relevant to the corresponding Network.</p> <p>AMCI – We have shown an improvement in both areas and KPIs. We continue to push for earlier MEP nomination as well as faster paperwork delivery. Our back office admin resources will be a key focus especially as we progress our 4G plan.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NGCM – IN24 RCC is no longer an issue; however, correction of Registry data will continue as required.</p> <p>We are regularly providing the Retailers with ICP lists of outstanding nominations. This is helping to improve update response time to the Registry. We continue to chase FSPs for late paperwork, an area that is improving.</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-Mar-20</p> <p>To: 11-Jan-21</p>	<p><b>AMCI</b></p> <p>Some inaccurate certification records.</p> <p><b>NGCM</b></p> <p>Some inaccurate certification records.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as moderate because there is room for improvement.</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 Metering will be presenting the new Code changes to all ATHs at our technical forum in April 2021. This has the express purpose of ensuring all test houses understand what is required in certification and design reports, including improvements that can be made.</p> <p>AMCI – SAI has been resolved. Some work is underway to standardise AMCI and Vector Metering’s maximum interrogation cycle requirements. CAT2 CTs are not certified but our system is configured to produce an automated expiry date – this date is fictitious and is ignored by the MEP and ATH. A systems modification will need to be made for CAT2 comparative certification.</p>		<p>NGCM – 31 /05/2021</p> <p>AMCI - Ongoing</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>NGCM – Once the reports reflect all the new Code changes, this issue is not expected to re-occur.</p> <p>AMCI - As per above.</p>		<p>AMCI - Ongoing</p>	

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-Mar-20</p> <p>To: 11-Jan-21</p>	<p><b>NGCM and AMCI</b></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	
<b>Medium</b>	<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 - ICPs with IN24 have all been corrected.</p> <p><b>Residential (CN only) and Cat 2 without CTs:</b> 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. 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><b>Invalid ATH recorded:</b> We believe this is due to the switch from the old Vircom (VEMS) to VCOM participant codes. We will correct the participant code and monitor for any future incorrect codes.</p> <p><b>No control device for register content requiring a control device:</b> These are 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><b>Control device installed, register content UN:</b> 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). Further investigation is required as part of our reconciliation programme.</p> <p>AMCI – The monthly reconciliations reports out of the Registry will support the correction of incorrect records. This, as well as our daily exception handling process, should minimise these situations going forward. In some cases, human error is a factor.</p>	Ongoing	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	Completion date	
<p>We are running 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 continue to work through these issues and look for opportunities to improve the speed in which they are addressed.</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-Mar-20</p> <p>To: 11-Jan-21</p>	<p><b>NGCM and AMCI</b></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	
<b>Medium</b>	<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
<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 endeavour to meet this timeframe and continue to look for ways to improve the timeliness of updates.</p> <p>AMCI – The monthly reconciliations reports out of the Registry will support the correction of incorrect records. This, as well as our daily exception handling process, should minimise these situations going forward. In some cases, human error is a factor.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We continue to look at ways to improve our processes so we can meet the 5BD requirement.		Ongoing
		Identified

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Mar-20</p> <p>To: 11-Jan-21</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> <li>• AMCI - 44 installations with inspection not conducted,</li> <li>• NGCM – 1,621 Category 2 installation with overdue inspection,</li> <li>• NGCM - 4 installations with low burden,</li> <li>• NGCM – 1 ICP with a bridged control device,</li> <li>• NGCM - 2165 metering installations not interrogated within the maximum interrogation cycle where the AMI flag is still “Y”,</li> <li>• NGCM - 6 metering installations were not recertified at the time bridging was removed,</li> <li>• AMCI - 11 installations with low burden, and</li> <li>• AMCI – 2 faulty metering installations outside applicable accuracy tolerances.</li> </ul> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>I have recorded the controls as weak in this area. 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 – All installations identified will have their certification cancelled immediately.</p> <ul style="list-style-type: none"> <li>• <b>1,621 Category 2 installation with overdue inspection.</b> These are Cat 2 sites that were certified for 15 years prior to August 2013. It has always been our intention to recertify these and any further ones at 10 years rather than inspecting them. Unfortunately, a large number expired last year, particularly in the earlier months of 2020. We were unable to attend these due to the COVID-19 lockdown and were unable to get sufficient stock for a few months, causing us to fall behind. We are working with our test house to get these recertified as a priority.</li> <li>• <b>4 installations with low burden.</b> We have requested the test houses to explain why these were not burdened and to return to site to add additional burden and recertify.</li> <li>• <b>1 ICP with a bridged control device.</b> The job to recertify was cancelled due to COVID-19 but was not picked up later.</li> <li>• <b>2,165 metering installations not interrogated within the maximum interrogation cycle where the AMI flag is still “Y”.</b> There have always been a number of ICPs where we have not changed the flag, such as inactive ICPs or disconnected/mains off sites. After discussions with the Authority and auditor, we are now aware that these must follow the same AMI flag rules as all other ICPs.</li> <li>• <b>6 metering installations were not recertified at the time bridging was removed.</b> This was a clear mistake by the ATHs and certification should have been cancelled, moving the ICPs into the BAU team for recertification.</li> </ul> <p>AMCI – We have an interim burdening process in place which includes either wire loops or burden boxes. We are working on our supply of approved and technically safe and fit-for-purpose burdening boxes.</p> <p>AMCI – Some work is required around certification cancellation. This would include addressing missed opportunities to cancel certification of sites with defective metering, a few of which were due to human error. We have noted this issue and put a process in place to address it, including a refresher/training for the relevant staff members.</p>	Ongoing	Investigating
<p style="text-align: center;"><b>Preventative actions taken to ensure no further issues will occur</b></p>	Completion date	
<p>NGCM – We continue to cancel certifications of sites with defective metering as we become aware of them. While we have been performing this at a steadily improving rate, there is still plenty of room for improvement.</p> <p>AMCI – These issues will be the subject of a refreshed focus on our part for FY21 and FY22.</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><b>NGCM</b></p> <p>Certification expired or cancelled for 37,121 NGCM metering installations.</p> <p><b>AMCI</b></p> <p>Certification expired for 118 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	
<b>Medium</b>	<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 – Past audits will show the majority of these uncertified metering installations are old ‘interim certified’ legacy sites where we have attempted multiple times, in some cases, to attend and upgrade, without success.</p> <p>Last year around 6,000 new ICPs were added as a previous statistical sampled population expired.</p> <p>Late in 2020, Vector Metering launched a new project called ‘Fantail’ with the aim to upgrade these uncertified legacy sites. The difference this time is that we have the support of at least one major Retailer. The Fantail team is tasked with deep diving into the UTC reasons of the past and finding possible avenues to overcome the roadblocks, something we have not been able to do successfully in the past, especially without Retailer support.</p> <p>There are still nearly 8,000 ICPs where we have no Retailer approval to attend site.</p> <p>AMCI – After reviewing the full list of sites highlighted as uncertified, the final count as indicated was lower due to certifications being completed after the report was run out of the Registry. In some cases, the Registry was not updated with new certification information due to a systems update issue.</p> <p>AMCI – Third parties continue to neglect taking action to certify their assets, expecting MEPs to carry the cost – displacement is not always practical.</p> <p>AMCI – A number of sites have safety issues like customer related asbestos onsite or concerns over shutdowns (hospitals). The relevant parties are unwilling/unable to provide access, resulting in alt cert expiring in some cases.</p> <p>AMCI – Some customers are currently undergoing major supply and installation upgrades which means meter compliance is not being permitted or practical.</p> <p>AMCI has taken action in all cases to try to resolve non-compliances.</p> <p>The C&amp;I Ops Manager runs a non-compliance report each month comparing non-compliant volumes. Currently, our level of non-compliance remains stable with a good churn of old and new sites.</p>	Ongoing	Investigating
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	Completion date	
<p>We continue to upgrade/recertify meters when possible, as stated above. Better support from Retailers will make this task easier.</p> <p>AMCI – As per above.</p>	Ongoing	





Alternative Certification Requirements			
Non-compliance	Description		
<p>Audit Ref: 7.9</p> <p>With: Clause 32(2), (3) and (4) of Schedule 10.7</p> <p>From: 19-Jan-21</p> <p>To: 20-Jan-21</p>	<p><b>AMCI</b></p> <p>Notification of alternative certification not provided to the market administrator within 10 business days.</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		
<b>Low</b>	<p>The controls are recorded as moderate because 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 – We missed one alt cert 10 BD notification. Overall, the alt cert process works well and notification goes out as soon as we receive the paperwork requesting an alt cert.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AMCI – We will focus on this issue in the second quarter of 2021.		Ongoing	

Interim Certification		
Non-compliance	Description	
<p>Audit Ref: 7.19</p> <p>With: Clause 18 of Schedule 10.7</p> <p>From: 01-Apr-15</p> <p>To: 03-Mar-21</p>	<p><b>NGCM</b></p> <p>24,694 ICPs with expired interim certification.</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	
<b>Medium</b>	<p>I have recorded the controls as moderate in this area because certification has been expired for a number of years for these ICPs.</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 – The number of ICPs with this issue has declined from 30,480 in 2020 to 24,694 in 2021. These are, as stated in previous reports, being actively managed. We have been sharing information about any barriers to compliance with the Authority so they can assist us in achieving compliance.</p> <p>Project Fantail is aimed at clearing any blockers so we can attend each of these sites and ideally upgrade them to smart metering and have the sites recertified.</p> <p>AMCI – N/A</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Project Fantail is aimed at clearing any blockers so we can attend each of these sites and ideally upgrade them to smart metering and have them recertified.</p> <p>AMCI – N/A</p>	Ongoing	

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><b>NGCM</b></p> <p>1,621 NGCM installations with inspection not conducted.</p> <p><b>AMCI</b></p> <p>44 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	
<b>Medium</b>	<p>I have recorded the controls as moderate in this area for NGCM because reporting is in place but 17 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 - 1,621 NGCM installations have not been subject to an inspection.</p> <p>These are Cat 2 sites that were certified for 15 years prior to August 2013. It has always been our intention to recertify these and any further ones at 10 years rather than inspecting them. Unfortunately, a large number expired last year, particularly in the earlier months of 2020. We were unable to attend these due to the COVID-19 lockdown and were unable to get sufficient stock for a few months, causing us to fall behind. We are working with our test house to get these recertified as a priority.</p> <p>AMCI – We monitor late and early inspections with a process for certification cancellation in place. We are implementing a process for a technician to recertify a site as soon as possible when the technician misses an inspection for whatever reason.</p>	<p>NGCM - 30/04/2021</p> <p>AMCI - Ongoing</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>NGCM – We will review whether to move the certification expiry date to +10 years from 15 years. This would allow our monitoring database to detect those coming up for recertification and put in a process for a site visit.</p> <p>AMCI – We issue work 3 months prior to the inspection due date, yet FSPs still struggle to complete this work. The COVID-19 lockdown has impacted access to sites.</p>	<p>NGCM - 30/05/2021</p> <p>AMCI - Ongoing</p>	
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Investigation of Faulty Metering Installations		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 29-Dec-20 To: 13-Jan-21	<b>AMCI</b> Notification of investigation of faulty installations not provided to affected parties within 5 business days. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
AMCI – AMCI has resolved this issue with the Authority, having missed the notification due dates. We will focus on ensuring notifications will be provided within the required timeframe Certification cancellation for defective sites was misinterpreted but this has been clarified and all certification will be cancelled going forward.	23/03/2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As per above	23/03/2021	

Statement of Situation		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 10.46(2) From: 23-Dec-20 To: 13-Jan-21	<b>AMCI</b> Statement of situation not provided to Authority and affected parties within 3 business days. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
AMCI – AMCI has discussed and resolved this issue with the Authority. We will focus on ensuring notifications will be provided within the required timeframe. Certification cancellation for defective sites was misinterpreted but this has been clarified and all certification will be cancelled going forward.	23/03/2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
As per above.	23/03/2021	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.5</p> <p>With: Clause 8(2) of schedule 10.6</p> <p>From: 01-Jun-19</p> <p>To: 13-Jan-20</p>	<p><b>NGCM</b></p> <p>2,161 metering installations not read within the maximum interrogation cycle, where the AMI flag is still "Yes".</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room to tighten the timeframes for resolution of these matters.</p> <p>The impact on settlement is recorded as minor because of the low number involved; therefore, the audit risk rating for most retailers is low. For AMI only retailers, the impact would be major and the audit risk rating high.</p>	
Actions taken to resolve the issue		Completion date
<p>NGCM - There have always been a number of ICPs where we have not changed the flag, such as inactive ICPs or disconnected/mains off sites. After discussions with the Authority and auditor, we are now aware that these must follow the same AMI flag rules as all other ICPs.</p> <p>We are working with the Retailers (our customers) to ensure changing the AMI flag from 'Y' to 'N' will not cause them issues with their customers. Once we have completed these discussions and agree to set the flags to 'N', this will be an easy process change.</p>		30/06/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>NGCM – Once the process is changed, as per above, we do not expect this non-compliance to re-occur.</p>		30/06/2021
		Identified

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: 01-Jan-21</p> <p>To: 31-Jan-21</p>	<p><b>NGCM</b></p> <p>1,042 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: Twice</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<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, but unfortunately, as soon as they are out of the time limit, 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.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>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	



Investigation of AMI interrogation failures			
Non-compliance	Description		
<p>Audit Ref: 10.12</p> <p>With: Clause 8(11), 8(12) and 8(13) of Schedule 10.6</p> <p>From: 01-Feb-21</p> <p>To: 03-Mar-21</p>	<p><b>NGCM</b></p> <p>Reporting and processes not established to resolve interrogation issues or change the AMI flag to "N" at 22 days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are yet to be established to comply with this new requirement.</p> <p>The impact on traders due to not getting AMI data is high, because they have to estimate or manually read, and in some cases ask the customer to switch away, however the non-compliance is for not updating the registry and the impact of this is lower. I've recorded the audit risk rating as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NGCM - We are working with the Retailers (our customers) to ensure changing the AMI flag from 'Y' to 'N' will not cause them issues with their customers. This will include changing our process to ensure that if we cannot re-establish communications within 25% of our maximum interrogation cycle, we will set the AMI flag to 'N'.</p> <p>Once we have completed these discussions and agree to set the flags to 'N', this will be an easy process change.</p>		30/06/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We need to work with our customers before going ahead and making these changes or we run the risk of causing unforeseen issues with end consumers.</p>		30/06/2021	