

Compliance Plan Counties Power MEP – 2021

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 19-Mar-20 To: 30-Sep-20	Services access interface not recorded in certification records for one metering installation. Potential impact: Low Actual impact: None 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 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
The service access interface is both in the back office and the meter display, depending on desire of the Trader utilizing the meter at any particular time. Recording this in general seems superfluous as not a registry field and we have never had any query from a Trader regarding it.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will ensure it is properly recorded on the certification records however.	Date	

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Nov-19 To: 30-Nov-20	Some information in the registry is incorrect. Potential impact: Medium Actual impact: Low Audit history: Once 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
All systems are under ongoing improvement.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Regards certification cancellation, we do endeavour generally to have recertification work complete prior to the requirement to cancel, however cancellation will be carried out as necessary.	Date	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Nov-19 To: 30-Nov-20	31 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are in place to ensure the timeliness of updates, but Counties is often prevented from updating the registry due to late nomination or late updates from traders. 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
Counties Power has automated systems to carry out the function. Occasionally site visits are required to verify metering installation equipment - with inherent delays in obtaining site access from the customer.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This is just an ongoing effort to process registry data and updates as soon as practically possible.	Date	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Nov-19 To: 30-Nov-20	Some records updated on the registry later than 10 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	I have recorded the controls as moderate in this area because there is room to improve and shorten the notification process for updates. The late updates for new connections occurred after the trader had populated their records, therefore the impact on participants, customers or settlement is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The process mostly fails where Retailers issue new connections without corresponding MEP nominations, and data consequently cannot be uploaded. I believe the Retailers processes are non-compliant with the code, and have been for many years. An exception report on these jobs is regularly generated, but relies on continuous diligence of the customer service team to monitor and action, as advice from Retailers their side is completed is not always forthcoming.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Reminder to data processing team regards monitoring the ICP MEP nomination pending reports.	Date	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Nov-19 To: 30-Nov-20	Some inaccurate certification records. Potential impact: Medium 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 because there is room for improvement. 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
The issue arises primarily on category 2 ICPs from the party livening the ICP and the independent Test House certifying the ICP being separate groups.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The matter has been raised with the Test House to use the livening dates on certificates. Also unacceptable delays in Test House completing the work issued has also been raised with both of the ATH. Some better coordination to be implemented by Counties power also.	Date	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Nov-19 To: 30-Nov-20	Some registry records incomplete or incorrect. 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	I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made. Very few of the discrepancies have an impact on participants, customers or settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The practice of auto acceptance of MEP nomination where ICPs are off network to be changed.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continued vigilance with data issues. Some new logic applied around key data entry fields will address a number of such issues.	Date	

Cancellation of Certification		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 01-Nov-19 To: 30-Nov-20	Certification not cancelled on the registry for: <ul style="list-style-type: none"> - two metering installations where inspections were not completed within inspection window, - two metering installations where low burden is present, and - two category 1 metering installations where meters were bridged. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The installations with low burden are all recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for Counties 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. I have recorded the controls as moderate as there is room for improvement.	
Actions taken to resolve the issue	Completion date	Remedial action status
Certifications cancelled or updated as appropriate.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Closer adherence to existing internal processes will mean such certifications will not required cancellation.	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: 01-Nov-19</p> <p>To: 04-Feb-21</p>	<p>Certification expired for:</p> <ul style="list-style-type: none"> - 641 previously interim certified category 1 ICPs, - 375 category 1 ICPs, and - 1 category 4 ICP. <p>Certification cancelled for four 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	
Medium	<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, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Noted – the existing program of work is continuing to find resolutions to the long standing ICPs with documented technical, safety, or customer opposition type matters.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Progress in this area has been reasonably good considering customers have understandably been reluctant to allow our technicians access into their homes in the middle of the pandemic over the past year.</p> <p>However ongoing continuous improvement in compliance numbers is still clearly demonstrable on a weekly basis, and will remain a key priority over the next 12 months.</p>	Date	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 04-Feb-21	641 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, therefore the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
This is purely a repeat of earlier findings above – nothing further to add.	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Interim certification is no longer a separate issue to certification general – this section should be dispensed with.	Date	

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 13-May-20 To: 04-Feb-21	Inspections not conducted within the allowable window for two 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 because they mitigate risk most of the time but there is room for improvement. 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
Already raised in the certification cancellation section, only two occurrences	Date	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to fight for limited Test House Resources to complete all scheduled programs of work. (A situation made worse due to widespread disruption both in supply chain materials and also time lost to Covid lockdowns).	Date	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8 of Schedule 10.6 From: 01-Nov-19 To: 30-Nov-20	91 installations not interrogated within the maximum interrogation cycle. 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 because reporting is in place but there is room for improvement to ensure all AMI installations are successfully interrogated. 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.	
Actions taken to resolve the issue		Completion date
Counties power is reliant on a 3 rd parties systems operating properly here, and we continue to push them to correct static data when required to get meter data flowing. The non-com flag management process was thought to have been sorted, but for something initially seemingly straightforward management of the flag has proven to be an ongoing problem between COUP and IHUB systems.		Date
Preventative actions taken to ensure no further issues will occur		Completion date
Improvement to the process of AMI non-com flag status management between COUP and IHUB has been identified as a key requirement here, to be escalated.		Date
		Investigating

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Nov-19 To: 30-Nov-20	<p>82 examples of clock errors outside the allowable thresholds in the 26 November 2020 report.</p> <p>Some time errors for category 2 meters not reported to reconciliation participants.</p> <p>Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have recorded the controls as strong because clocks are synchronised during every successful interrogation.</p> <p>The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Noted, to a large extent time sync is out of direct control of COUP who have no direct access to control of the systems in question.	Date	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Has been, and will be raised once again with IHub.	Date	