

Compliance Plan for Delta MEP – July 2021

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 01-Jul-20 To: 05-May-21	Registry not always updated as soon as practicable by Delta. Potential impact: Medium Actual impact: Low Audit history: None 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
Aurora have acted as an agent for half of the audited period. Delta have migrated this function in-house. <ul style="list-style-type: none"> • Gentrack & Registry training for Delta staff ongoing • Registry-Gentrack discrepancy report to be run each month and discrepancies resolved. • Audit Compliance report to be used to identify discrepancies and compliance staff to remedy. 	31-10-2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Aurora have acted as an agent for half of the audited period. Delta have migrated this function in-house. <ul style="list-style-type: none"> • Gentrack & Registry training for Delta staff ongoing • Registry-Gentrack discrepancy report to be run each month and discrepancies resolved. 	31-10-2021	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jul-20 To: 23-Jun-21	223 records not updated to the registry within 10 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as weak as they had not been sufficient to prevent late updates. The impact on participants, customers or settlement could be minor where a certification update is late; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The majority of these late registry updates are due to the completion of a DELT stat sampling project and resourcing issues. The volume of stat sampling data was a one-off phenomenon since taking over from Aurora. Better planning will avoid re-occurrence in future. Updates have now been completed.		complete
Preventative actions taken to ensure no further issues will occur		Completion date
Registry data capture staff will be given prior notice to the upcoming completion of a stat sampling project in future allowing for prioritized updating and resource planning.		complete
		Remedial action status
		Identified

Provision of Registry Information			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Jul-20 To: 05-May-21	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. There are still a small number of areas where improvement can be made. Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<ul style="list-style-type: none"> Registry-Gentrack discrepancy report to be run and discrepancies resolved. Audit Compliance report to be used to identify discrepancies and compliance staff to remedy 		31-10-2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> Audit Compliance report to be used to identify discrepancies periodically and compliance staff to remedy Registry-Gentrack discrepancy report to be run each month and discrepancies resolved. 		31-10-2021	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Jul-20 To: 05-May-21	Discrepancies not resolved within 5 business days. Potential impact: Medium Actual impact: Medium 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 they mitigate risk most of the time, but some late updates still occur. Some of the discrepancies may have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Reconciliation report to be analysed and rectifications taken in a more timely fashion (within 5 working days)	01/07/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Allocation of tasks and responsibilities completed (for accountability) Better filing system to be employed.	01/07/2021	

Cancellation of Certification			
Non-compliance	Description		
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 01-Jul-20 To: 05-May-21	Certification cancelled, and registry not updated within 10 business days for three ICPs with low burden. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area because processes are managed with sufficient controls to avoid cancellation of certification. The installations with low burden have been recertified with burden added. The responsibility for Delta 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.		
Actions taken to resolve the issue		Completion date	Remedial action status
Registry was not updated BUT jobs had been completed. The internal notification process is flawed and needs to be reviewed.		31/07/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
More Gentrack/Registry training required for staff Improvement of timeline and data entry notification process (field completion to Gentrack data entry)		31/07/2021	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Jul-19 To: 23-Jun-21	Three metering installations with time keeping errors are not checked every 12 months. Potential impact: Low Actual impact: Low Audit history: Once Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as none as there is no process in place to check the time keeping error for these installations. 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
DELTA have ordered a reader head and have downloaded the software required to perform these checks and adjustments. The reader head is on back order. DELTA will perform these checks and any required adjustments as soon as necessary equipment is available. Landys & Gyr have been chased up multiple times on this.	31/08/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once DELTA have the required equipment these checks, and any required adjustments will be scheduled periodically.	31/08/2021	

Statistical Sampling		
Non-compliance	Description	
Audit Ref: 7.13 With: Clause 16(1) of Schedule 10.7 From: 15-Dec-20 To: 23-Jun-21	Sample not representative of the group of meters certified using the statistical recertification method. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	I have rated the controls as weak because the Delta process did not ensure correct selection of samples. The impact could be significant, as it is likely that inaccurate metering installations have been recertified. The audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
The DELT MEP has followed the guideline and considers the sample to be representative of the group. <ul style="list-style-type: none"> • The experience of the lab technicians and the testing history of the meter types selected indicate that these meters have similar test results and would deteriorate at the same rate. • The range of environments are all very similar, as the meters are installed in the same part of the country. • The age of the meters are all very similar as they were initially installed and certified at a similar time resulting in a similar cert expiry date. • Despite individual models the meters have a very similar physical composition being made in a similar way with similar functionality with the same end result. 		complete
Preventative actions taken to ensure no further issues will occur		Completion date
The auditor's comments/recommendation shall be taken into consideration when selecting future groups for the ATH to select the sample from.		Date
		Disputed

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 01-Apr-21 To: 17-May-21	Category 1 inspection report for 2020 not provided to the Authority by 1 st April 2021. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate because there is room for improvement. There was no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Inspection report was supplied to the EA prior to the audit	complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Annual reminders have been set in our compliance calendar to ensure these are sent on time.	Complete	