

Compliance Plan for FCLM MEP – 2020

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 five metering installations. Potential impact: Low Actual impact: None 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 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
Feedback provided to ATH regarding missing data Training provided to team to check for incomplete data by ATH	15/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Further training to be clear on ATH requirements on Metering certification reports and a random sample to be checked once a month	On Going	

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Feb-21 To: 30-Sep-20	Registry not always updated as soon as practicable in some cases. Potential impact: Medium Actual impact: Low Audit history: Twice 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
Continue to manage the program of work to ensure these sites are identified and provide training to the team to ensure all required updates are actioned when required.	20/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Look to create improved reporting and automation to cancel sites that become non-compliant. Most of these were sites that missed inspection due to Covid-19 restrictions. Initially we looked at applying for an exemption then subsequently decide to update certification and look to replace and recertify,	01/08/2021	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Feb-20 To: 30-Sep-20	76 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times 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 FCLM is often prevented from updating the registry due to late field notification. 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
Continue to report and manage fieldwork activities and try encouraging return of completion paperwork to ensure timeframes are met. Existing process to Identify anomalies was carried out pre monthly invoicing. Change process to be a daily task	20/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Actively work reports created and ensure processing team have the resource to process the work as it comes in and follow up where required	On Going	

Design Reports for Metering Installations		
Non-compliance	Description	
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 09-Jul-20 To: 24-Aug-20	Design Report not recorded for three metering installations. 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 recorded as strong because processes are in place to ensure that correct design reports are used. 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
Provide feedback to the ATH regarding missing mandatory data Continue to remind internal staff to identify missing data and send it back to the ATH to complete	20/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Immediate reminder sent and training provided to staff to ensure they identify missing data appropriately and encourage contractors to complete this. Carry out regular internal audits	On Going	

Metering Installation Design & Accuracy		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 09-Jul-20 To: 24-Aug-20	Design Report not recorded for three metering installations. 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 recorded as strong because processes are in place to ensure that correct design reports are used. 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
Immediate reminder sent and training provided to staff to ensure they identify missing data appropriately and encourage contractors to complete this.	20/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to remind internal staff to identify missing data and send it back to the ATH to complete Carry out regular internal audits	On Going	

Changes to Registry Records (Clause 3 of Schedule 11.4)		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Feb-20 To: 30-Sep-20	Some records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate in this area because they reduce risk most of the time but there is still room for improvement, especially with new connection 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
Discrepancy reporting to identify these and have initiate discussions with third parties to minimise where possible	20/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Look at our process as to what event data we use when updating data to the registry. If the update does not affect reconciliation, then look to use the date updated. (Will seek advice before change of process) Discrepancy reporting and follow up including retrospectively to identify trends and address these. Continue to lobby 3 rd parties to update registry in a timely fashion to enable us to meet our obligations	On Going	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Feb-20 To: 30-Sep-20	Some CT information is missing for 7 ICPs. Some inaccurate certification records. 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 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
Report was created just after audit was undertaken to ensure we pick up where by old ATH code TRUS was used instead of FCLM due to being existing TRUM sites certified under TRUS name now certified under FCLM – Data Corrected	20/12/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Actively work report created which identifies anytime where FCLM are not the ATH to ensure we are not missing ones that were previously TRUS or other ATH incorrectly Create report that identifies missing CT information	01/03/2021	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Feb-20 To: 29-Jun-20	Three late MN files. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. There was no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Internal training for FCLM Orion system to ensure full team have the skill and knowledge to process MEP nominations and other registry acknowledgements	20/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Look into possibility of alert of reports to identify when these have not been cleared to ensure transparency and that these can be worked effectively	01/03/2021	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Feb-20 To: 30-Sep-20	Some registry records incomplete or incorrect. Potential impact: Medium Actual impact: Low Audit history: Multiple times 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. The number of discrepancies is very small. Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Discrepancy reporting tools used to identify these and work them based on priority levels that effect third parties	On Going	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to actively work these reports and update appropriately in a timely manner.	On going	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Feb-20</p> <p>To: 30-Sep-20</p>	<p>Certification cancelled and registry not updated for:</p> <p>11 installations not fit four purpose due to low burden, and</p> <p>98 installations without inspections conducted within the allowable window.</p> <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	
Medium	<p>I have recorded the controls as weak in this area because in most cases, the registry is not populated with the correct expiry date when certification is cancelled.</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>Only 8 inspections were missed not 98 as noted</p> <p>These were sites that missed inspection due to Covid-19 restrictions. Initially we looked at applying for an exemption then subsequently decide to update certification and look to replace and recertify.</p> <p>We had cancelled these sites just not withing the 10 day requirement. We believe the correct expiry was used, the day after the required window. Would like clarification of Auditors interpretation.</p>	20/12/2020	<p>Disputed</p> <p>Cleared for category 1 missed inspection which have now been cancelled</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We are no longer completing Cat 2 inspections we have now including this in our Cat 2 recertification program to be replaced.</p> <p>Report to be created to cancel certification if inspections not completed in time.</p>	01/02/2021	

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-Feb-20</p> <p>To: 30-Sep-20</p>	<p>Certification cancelled or expired for 2,711 ICPs.</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
Statistical sampling in progress will address a number of these sites along with Cat 2 recertification program. We also have identified a remedy in the Line area to address a number of previous UTI sites	01/03/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue actively pushing our compliance program of work to ensure project such as stat sampling is completed and number of non-compliance reduces	On Going	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Feb-20 To: 30-Sep-20	73 meters with time clocks that are not monitored every 12 months. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There isn't a process in place to check the time setting on these meters. 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
Sie visit to confirm time clock accuracy	01/02/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
These have been scheduled for replacement during 2021	31/12/2021	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 30-Sep-20	703 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 five 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
These are treated as Non Certified and addresses as per 7.1. These are part of our compliance plan to strive to obtain 100% certification		01/02/2021
Preventative actions taken to ensure no further issues will occur		Completion date
Code changes as of 1st February 2021 will remove this clause as not penalise us twice for these non-compliant sites.		01/02/2021
		Identified

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 16-Sep-20 To: 20-Nov-20	Inspections not conducted within the allowable window for 89 category 1 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
Certifications backdated and report created to identify these in future. These are currently part of a Stat Sampling process and its envisaged that they will get another 7 years certification	01/03/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to manage reports and update where appropriate in a timely manner. Ensure these are covered in Compliance program	01/03/2021	

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 26-Jul-20 To: 20-Nov-20	Inspections not conducted within the allowable window for 8 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
As per 6.4 We are no longer completing Cat 2 inspections we have now including this in our Cat 2 recertification program to be replaced. Certification Cancelled	20/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per 6.4 We are no longer completing Cat 2 inspections we have now including this in our Cat 2 recertification program to be replaced.	01/01/2022	

Access to Raw Meter Data		
Non-compliance	Description	
Audit Ref: 10.1 With: Clause 1 of Schedule 10.6 From: 01-Feb-20 To: 20-Oct-20	Data provided to some traders is not raw meter data. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because data includes all decimal places provided for a large proportion of ICPs. The impact is assessed to be low, because a small number of ICPs are affected and the issue only affects the third decimal place under certain circumstances.	
Actions taken to resolve the issue	Completion date	Remedial action status
By standardizing to EA recommended EIEP3 format we now breach. Modified file to contain 4 decimal places.	20/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Changed files to include 4 Decimal places	20/12/2020	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Feb-20 To: 20-Oct-20	Clock errors greater than the threshold for 2 ICPs. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations. The errors were all small and none were across a trading period, therefore there is no impact on participants or settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Time adjusted when identified as outside tolerances	At the time	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Time adjusted when identified as outside tolerances	At the time	