

Compliance Plan for Intellihub Ltd MEP – 2021

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 01-Feb-21 To: 27-May-21	Each services access interface not identified for 67 metering installations. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as weak as they are not sufficient to identify errors in certification reports. 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 Intellihub ATH has developed revised Category 1 and Category 2 Metering Installation Certification Report templates for use by new connections contractors, as well as making changes to Metering Installation Certification Reports for Intellihub ATH technicians. Reports now include all service access interfaces as appropriate. For both Category 1, and Category this will also include the conditions of use for each. Intellihub MEP in collaboration with our ATH will reissue communication to contracted ATH's to ensure their respective processes and related systems are set up to cover this requirement on-going.	01/08/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above, with some internal guidance to staff.	01/08/2021	

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Jun-20 To: 27-May-21	All practicable steps not taken to ensure data is correct and that incorrect data is corrected as soon as practicable. 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 registry related 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
Intellihub has assigned dedicated resource to focus solely on data quality. Intellihub continues to work to identify areas for improvement as part of a continuous improvement cycle.	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	On-going	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jun-20 To: 22-Apr-21	480 registry updates later than 15 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	Controls are in place to manage timeliness, but improvements are required to ensure late notifications from the field and exceptions are reduced. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
IntelliHub is reviewing the mechanisms for interacting with contracted ATH's with a view to reducing time delays in retrieving data. IntelliHub will also be investigating opportunities to improve work order exchanges with Traders.		July 2021
Preventative actions taken to ensure no further issues will occur		Completion date
IntelliHub will continue to provide feedback on exceptions to ATH's and remind them of their obligations to promptly return paperwork.		On-going
		Investigating

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jun-20 To: 22-Apr-21	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 they haven't changed since the last audit, and they are sufficient to ensure most updates are on time but there is considerable room for improvement. 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
Field techs advised of the importance of the accurate and timely return of paperwork.		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
Intellihub will continue to provide feedback on exceptions to contractors and remind them of their obligations to return paperwork promptly		On-going
		Investigating

Accurate and Complete Records			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1)(a) and (b) of Schedule 10.6</p> <p>From: 01-Jun-20</p> <p>To: 22-Apr-21</p>	<p>A high number of fields not accurate and complete in a sample of 100 Certification records.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls require strengthening to ensure record accuracy issues are identified as soon as possible.</p> <p>The impact is minor for most fields. Incorrect certification dates and methods can be misleading and can lead to re-work.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Intellihub has reallocated tasks within teams with the objective of reducing the time taken, and the number of inaccuracies, when creating Metering Installation Certification Reports</p> <p>As a result of recommendations from the last audit, Intellihub have a dedicated resource to quality check records.</p> <p>Intellihub will continue to engage with ATH's on better clarity and presentation of certification reports to ensure these are fit for purpose.</p>		On-going	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Intellihub will continue to engage with ATH's on better clarity and presentation of certification reports to ensure these are fit for purpose.</p>		On-going	

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-Jun-20</p> <p>To: 22-Apr-21</p>	<p>Some registry records incomplete or incorrect.</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 are still a small number of areas where improvement can be made. ATH accuracy is a good example.</p> <p>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.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Intellihub have good controls in place to ensure no new data discrepancies are sent to the Registry.</p> <p>Intellihub will continue to work with Participants for access to sites where site visits are required to help resolve some of the discrepancies identified in the table above, and have placed a lot of focus on achieving quality outcomes</p>		On-going	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Intellihub has appointed a permanent trainer working with our staff, particularly with new employees to ensure a robust focus on quality</p>		January 2021	

Correction of Errors in Registry			
Non-compliance	Description		
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Jun-20 To: 27-May-21	Discrepancies not resolved within 5 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 are still a small number of areas where improvement can be made. Certification date accuracy is a good example. 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
Intellihub is working towards resolving discrepancies which have the highest impact on participants.		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Intellihub is committed to an ongoing focus on continuous improvements to the quality and completeness of all of its transactions.		Ongoing	

Cancellation of Certification			
Non-compliance	Description		
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 01-Feb-21 To: 27-May-21	Certification not cancelled on the registry for three metering installations where low burden is present. Potential impact: Medium 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 most processes are managed with sufficient controls to avoid cancellation of certification. The controls have improved with regard to installations with low burden as ATHs are adopting new processes in line with the February 1 st code change. Whilst the overall error has been recorded as less than the 2.5% maximum it has been shown that under burdened CTs can result in an increase in error of 0.5%. I have recorded the impact as medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Intellihub agrees with this finding. Certification for the 3 ICP's identified has been cancelled on The Registry and site visits organized to recertify and to address burden.		01/08/2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The guidance given in our CT burdening procedure has been by amended to ensure that it clearly includes instructions on the burdening of very low burden rated CTs. The anticipated solution is to check measured values against calculated burden values from cable lengths and characteristics, then ensuring that the final recorded burden values are within the required limits. This process is validated by repeating the tests for different primary current values or adding one or two metres of standard copper wire.		24/06/2021	

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-Jan-98</p> <p>To: 22-Apr-21</p>	<p>Certification expired, cancelled or late for 2,859 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
<p>Intellihub has been working proactively with Retailers to gain access to metering installations which have expired certification.</p> <p>Intellihub has systematically maintained records of communications with Retailers to provide evidence of our proactive engagement.</p> <p>Intellihub has also maintained records of Consumer turndowns, along with the specific turndown reasons, when approached by contracted ATH's.</p>	On-going.	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
All actions and retailer communications trails are now documented and stored for records; we also store the UTC (Unable to Complete or Turndown) history for the majority of expired metering installations where we have been unable to complete recertification activity.	On-going	

Certification Tests			
Non-compliance	Description		
Audit Ref: 7.2 With: Clause 10.38(b) From: 23-Oct-20 To: 27-May-21	Testing not conducted for one category 2 metering installation. Meter register not incrementing when raw meter data tests conducted on Intellihub meters with no decimal place. 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 as Intellihub has taken steps to ensure that the raw meter data test requirements are now met, though further checking is required to ensure all required testing is conducted by ATHs. There is no impact as the Intellihub has confirmed that the meter register will increment when the meter pulses; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Intellihub to revisit the one individual Category 2 metering installation. This is currently being planned with the Retailer and ATH.		August 2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Intellihub has instructed all ATH's working for the Intellihub MEP to conduct the register advance check as an integral element of the Raw Meter Data Output Test.		Completed	

Interim Certification			
Non-compliance	Description		
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 22-Apr-21	560 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 several 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
These ICP's are a subset of the approx. 2800 expired ICP's identified in Section 7.19 above, and attempts will have already been made to recertify. As mentioned above, Intellihub has engaged closely with the relevant Traders to attempt to obtain access.		Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8 of Schedule 10.6 From: 01-Jun-20 To: 27-May-21	Some meters not read during the maximum interrogation cycle. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Strong controls are in place to change the AMI flag to “N” if data cannot be collected. 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
On reviewing the 3 examples outlined above, all 3 were identified as having arisen prior to our new process for AMI interrogation failures coming into effect, as described in section 10.12, and on that basis the AMI flag was not updated within the timeframe required by the 1 Feb rule changes. Certification for these ICP’s have subsequently been cancelled.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Intellihub has created a weekly report that identifies meters that have not read within 60% of their MIC and still have the AMI Flag set to Yes. This is a “Safety Net” report which will identify meters that were not captured in the daily (25% or 30 days) AMI Flag process. Intellihub will also run the full MIC (100% of MIC) report on a weekly basis to confirm there are no meters that have reached their full MIC with the AMI still set to No (which would require certification to be cancelled)	June 2021	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-May-19 To: 31-Mar-20	80 examples of clock errors outside the allowable thresholds in the most recent reports. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong because clocks are synchronised during every successful interrogation. The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
There are no further preventative actions identified that we can reasonably implement.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per above.	Completed	

Comparison of HHR Data with Register Data		
Non-compliance	Description	
<p>Audit Ref: 10.9</p> <p>With: Clause 8(9) of Schedule 10.6</p> <p>From: 01-Jun-20</p> <p>To: 27-May-21</p>	<p>1,886 meters failed sum-check prior to exemption coming into effect.</p> <p>Interrogation not successful within 25% of maximum interrogation cycle or 30 days for an unknown number of meters.</p> <p>Potential impact: Low</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	
Low	<p>The controls are recorded as moderate 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
<p>Intellihub has been granted an exemption to apply a 2-kWh sum check tolerance to some meters within its fleet. The exemption was granted after the 1 February Code changes came into effect, and sum check failures between 1- and 2-kWh occurred for a number of the related meters between 1 February and the date the exemption was granted.</p> <p>The EA have granted a subsequent exemption that allows the Intellihub Class B ATH to perform back office recertification for any meter that is within the scope of the exemption and failed sum check between 1 and 2kWh between 1 February and 5 May. The exemption also sets out that Intellihub must notify the affected Traders where ICPs that they trade on are to be recertified.</p> <p>Intellihub now has a daily sum-check process in place that is compliant with the 1 February rule changes. There was insufficient time for this change to be implemented between the rule changes being announced 15 December 2020 and them taking effect on 1 February 2021. As a result, sum check failures for some meters were not investigated within 3 business days. Intellihub will notify the affected Traders and will work with them to carry out field activity for meter replacements and recertification to resolve this issue.</p>	December 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Intellihub has implemented a fully compliant and audited daily sum-check process to manage sum check failures in accordance with 1 February EA Code changes and the approved Code exemption.	Completed	
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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: 20-May-21</p>	<p>Reporting and processes not in place to resolve interrogation issues or change the AMI flag to "N" at 25% of the MIC or 30 days.</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 reporting had been put in place at the time of the audit.</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
Code changes regarding AMI interrogation failures came into effect 1 February 2021. Intellihub had to carry out significant changes to our processes and systems to achieve compliance, and there was not sufficient time available to complete this work before the code changes came into effect. As a result, Intellihub was unable to manage AMI interrogation failures until our implementation of the change was complete.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Intellihub has now implemented a compliant daily process to manage AMI Flag updates in accordance with 1 st February EA Code changes.	Completed	