

Compliance Plan for Ventia MEP – December 2020

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11.2 and Clause 10.6 From: 07-Dec-19 To: 18-Nov-20	All practicable steps have not been taken to ensure information is complete and accurate. Potential impact: Medium Actual impact: Low Audit history: Three times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because they will not ensure errors are mitigated. 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
Where incorrect information in the registry has been identified, this has been corrected. At this stage this is still a manual checking process.	20/1/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are currently looking at how we can automate this process from our records database.	Ongoing	

Metering Installation Design & Accuracy		
Non-compliance	Description	
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 16-Mar-20 To: 10-Sep-20	Five metering installations certified with uncertainty greater the maximum stipulated in Table 1. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate because there is room to improve processes. There may be a moderate impact on metering installation accuracy; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
The uncertainties and errors for these 5 installations and one or two more that we have identified have been recalculated in compliance with this clause. The uncertainties previously shown were the uncertainties for the load run and not the installation error and uncertainties.	15/01/2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
The certifying technician has been trained in these requirements.	11/01/2021	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 07-Dec-20 To: 18-Nov-20	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 as there is room for improvement. The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The updating of the registry is now part of our certification process. There may still be an issue where other Test Houses have performed the certification work, where the paperwork is not provided in the specified timeframe.	15/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Updating the Registry has been made part of our certification process.	15/01/2021	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 07-Dec-19 To: 18-Nov-20	Incorrect registry information. 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 as there is room for improvement. The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Where incorrect information in the registry has been identified, this has been corrected. At this stage this is still a manual checking process.	20/1/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are currently looking at how we can automate this process from our records database.	Ongoing	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 07-Dec-19 To: 18-Nov-20	Registry validation not conducted. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	A process is not in place to validate registry data, therefore the controls are recorded as none. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Where incorrect information in the registry has been identified, this has been corrected. At this stage this is still a manual checking process.	20/1/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We are currently looking at how we can automate this process from our records database.	Ongoing	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 07-Dec-19</p> <p>To: 18-Nov-20</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> • three installations with low burden, • monitoring not conducted for two installations certified at a lower category, and • five metering installations certified with uncertainty greater the maximum stipulated in Table 1. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</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 because there is room to improve processes.</p> <p>The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The five installations that had incorrect uncertainties have had the uncertainties recalculated the certification cancelled and have been recertified see also 4.3 above.</p> <p>We have put in place monitoring on the two installations the certification was cancelled and recertified after monitoring was put in place, We had previously recertified all our installation using the correct category, and were unaware a contracting TH had certified these installations at a lower category.</p> <p>We are still dealing with the 3 installations with the low CT burden.</p>	<p>15/01/2021</p> <p>15/01/2021</p> <p>Ongoing</p>	<p>Cleared</p> <p>Cleared</p> <p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Our certification and tracking will prevent this happening in the future.</p>	<p>20/1/2021</p>	

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 07-Dec-19 To: 18-Nov-20	Certification cancelled for 10 ICPs. Potential impact: High Actual impact: Medium Audit history: Multiple Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	I have recorded the controls as moderate as there is now a process to ensure expired certification is identified and recertified. There is room to improve processes regarding cancelled certification. The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
The certifications for the 10 installations were cancelled and all but the 3 low burden CT have been recertified	20/1/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Going forward the additional checking during certification will identify these issues before the certification status becomes an issue	20/1/2021	

Certification as a Lower Category		
Non-compliance	Description	
Audit Ref: 7.6 With: Clause 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7 From: 07-Dec-19 To: 18-Nov-20	Monitoring not conducted for two installations certified at a lower category. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	As there is no process in place for monitoring the controls are recorded as none. The impact on settlement and participants could be minor if the threshold was exceeded and not identified; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Load monitoring has been put in place for these two installations.	20/01/2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
It is our intension not to have any other installations certified at a lower category.	20/1/2021	