

WEL Networks Compliance Plan – MEP Audit November 2021

3.2 - Registry Notification of Metering Records (Clause 2 of Schedule 11.4)		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 18-Feb-20 To: 16-May-21	One registry update later than 15 business days. Potential impact: Low Actual impact: Low Audit history: Once 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. 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
Work with another party was required to be able to correct situation. The Registry was updated as soon as details were confirmed. Updated to registry was back dated to ensure accurate Registry records were maintained.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
When errors such as this come to light, we will continue to work them as a priority, but emphasis will always be on accurate date population.	Ongoing	

4.10 - 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-Dec-19 To: 16-Sep-21	Some records updated to the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Once 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 for improvement. The updates relate to corrections which have a minor impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The late updates to the HHR channels were part of the resolution to a bug fix that was identified and worked earlier in the audit period (Jan 2020). Backdating of the updates was to ensure accurate records in the Registry for the period we were the MEP.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have instigated a fortnightly report which includes amongst others reporting on instances of this issue. While this report will not prevent delayed notifications directly it will highlight any patterns so	Completed	

5.1 - Accurate and Complete Records (Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4)	
7.2 - Certification Tests (Clause 10.38(b) and clause 9 of Schedule 10.6)	
Non-compliance	Description
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4 From: 01-Feb-21 To: 06-Nov-21	Some inaccurate certification records. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 01-Feb-21 To: 06-Nov-21	Some certification tests not recorded by ATHs. 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 is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Information relating to items referenced by 9(1)(c) and 9(1)(c)(1) of schedule 10.7 are now being collected and included in certification report.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
For items relating to 33(2)(b) and (d) of Schedule 10.7 registry records will be corrected and Certification report altered to record. For item relating to 1(1)(d) of Schedule 10.8, certification reports will be altered to include validity period.	31 Dec 2021	

6.4 - Cancellation of Certification (Clause 20 of Schedule 10.7)	
7.1 - Certification and Maintenance (Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7)	
8.2 - Category 2 to 5 Inspections (Clause 46(1) of Schedule 10.7)	
Non-compliance	Description
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 26-Nov-20 To: 06-Nov-21	Inspection not conducted and certification not cancelled for ICP 0000022125WE134. Potential impact: Medium Actual impact: Unknown 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 is minor; therefore, the audit risk rating is low.

Non-compliance	Description
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 26-Nov-20 To: 05-Nov-21	Certification cancelled for ICP 0000022125WE134 Potential impact: Medium Actual impact: Unknown Audit history: None 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. The impact on settlement and participants is minor; therefore the audit risk rating is low.

Non-compliance	Description
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 26-Nov-20 To: 06-Nov-21	Inspection not conducted for ICP 0000022125WE134. Potential impact: Medium Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2
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
The recertification of ICP has been arranged for 16 Nov 2021.		16 Nov 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The recertification of this higher category ICP was dropped due to process gap resulting from the retirement of staff member. This gap will be addressed with the commissioning of a monthly report showing any and all higher (> Cat 1) category ICPs where certification is expiring in next 3 months. These will then be attended to according to whether WASN is the MEP, other party is MEP, or there is no MEP (NSP metering).</p>		31 Dec 2021	

9.1 - Investigation of Faulty Metering Installations (Clause 10.43(4) and (5))	
9.3 - Statement of Situation (Clause 10.46(2))	
Non-compliance	Description
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 13-Oct-21 To: 03-Nov-21	Faulty metering notification not provided within 20 business days for ICP 0080050190WEB67. 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.

Non-compliance	Description	
Audit Ref: 9.3 With: Clause 10.46(2) From: 14-Sep-21 To: 20-Sep-21	Trader not updated within three business days regarding a faulty meter at ICP 0080050190WEB67 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 recorded as moderate because they mitigate risk most of the time but there is room for improvement. 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
Nothing required to resolve this instance	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
In this instance the initial paperwork returned from the field contractor for the meter change contained confusing/incorrect ICP information. In the process liaising with contractor to correct, the update to the retailer was overlooked. Staff training has been undertaken to emphasise the timeliness of retailer updates.	Completed	

10.7 - Time Errors for Metering Installations (Clause 8(4) of Schedule 10.6)		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 23-Aug-21 To: 21-Sep-21	218 examples of clock errors outside the allowable thresholds. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk to an acceptable level. 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
We understand our obligation in maintaining accurate time synchronisation and believe our process is sound to discover and correct when time drift occurs.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
See above		

10.8 - Event Logs (Clause 8(7) of Schedule 10.6)		
Non-compliance	Description	
Audit Ref: 10.8 With: Clause 8(7) of Schedule 10.6 From: 01-Feb-21 To: 06-Nov-21	Event logs not routinely reviewed by WEL. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because although events are sent to reconciliation participants, the Code also requires the MEP to review all events. 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
See below		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will instigate a process of reviewing of event logs at the time they are sent to retailers.	30 Nov 2021	