

Compliance plan for Smartco MEP – 2021

Participants to Provide Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11.2 and Clause 10.6</p> <p>From: 01-Jul-20</p> <p>To: 29-Apr-21</p>	<p>Registry not always accurate and not always updated as soon as practicable by SmartCo.</p> <p>Certification records not always accurate.</p> <p>Replacement AMI data only provided for 60 days.</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>Controls are recorded as moderate because there is room to improve processes.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We are still seeing a handful of incorrect ATH identifiers coming through (VEMS), should be VCOM. We will identify the incorrect ones and remind VES (old Vircom) staff to use the correct identifier, and not accept jobs from the field with the old identifier on.</p> <p>More scrutiny was placed on certification report information this audit and a number of missing or incorrect fields were found. Vector metering (VM) have already been discussing the accuracy of certification reports with test houses in our regular test house forums. All test houses are actively improving their reports to ensure the missing or incorrect fields are right going forward.</p> <p>Replacement AMI data only provided for 60 days. The Authority's view is that there shouldn't be a limit, so that any data collected, regardless of how old it is, should be supplied to the retailers</p>	20 August 2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Actively working with test houses to ensure all required and correct information is included in the certification records.</p> <p>Reviewing field data to understand why VEMS is still being used as an ATH code, once we know why and how we can prevent this.</p>	20 August 2021	

Registry Notification of Metering Records			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-Jul-20</p> <p>To: 29-Apr-21</p>	<p>Some registry updates later than 15 business days.</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>Controls are recorded as moderate because there is room to improve the timeliness by ensuring more regular updates, and by checking if the changes have to be backdated where the MEP change from TPCO to SMCO occurs.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The reason for the percentage successful drop is as per last year and due to the SMCO transition program, this is an ongoing process to update ICPs and assets to SMCO owned in our system and the registry.</p> <p>In order to manage this efficiently, we receive a list of sites where the metering has been deployed and this list goes through a series of data validations before we can update the metering in our system. Due to the validations needed we run this process once a month. We also notify the retailer before we run the process so that they can nominate SMCO. The date we install in our system becomes the agreed transition date from the previous MEP to SMCO. For the majority of sites, the previous MEP has already updated the registry with the smart ready assets from the install date however they are not considered SMCO sites until the transition process has been run in our system. Due to this we use the event date and installation date of when the assets are updated in our system, not the physical install date.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		Ongoing	

Design Reports for Metering Installations			
Non-compliance	Description		
Audit Ref: 4.1 With: Clause 2 of Schedule 10.7 From: 01-Jul-20 To: 19-Jun-21	Design reports are not signed by the person who prepared the reports. The maximum interrogation cycle is not recorded for each services access interface. 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
Provide feedback to Delta to ensure their design drawings are signed and contain the new requirements regarding service access interfaces.		20 August 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Review design documents when they are updated to ensure all required information is included and correct.		20 August 2021	

Metering Installation Design & Accuracy		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 4(1) of Schedule 10.7</p> <p>From: 06-Aug-18</p> <p>To: 18-Jun-21</p>	<p>One metering installation certified by Wells ATH with a 32% error.</p> <p>Seven installations with errors greater than 1.5%.</p> <p>Potential impact: Medium</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 because these issues could be identified sooner, and recertification has not yet occurred for ICP 0003860754TP8CD.</p> <p>There is a moderate impact on metering installation accuracy; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>0003860754TP8CD has now been recertified as of 14/7/21.</p> <p>Provide feedback to Delta on the seven installations with errors greater than 1.5%, work with them and other ATH's to ensure they understand the code requirements.</p>	20 August 2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We first need to pass this back to Delta so they can investigate the circumstances around this and what they can do to manage it better going forward. Once they understand it we can work with them to ensure other test houses are aware.</p>	20 September 2021	<p>Post audit comment:</p> <p>In Delta's most recent ATH audit report, they dispute the requirement to ensure components are operating within their class. The proposed liaison with Delta will hopefully assist in educating them and changing their practices.</p>

Net metering and Subtractive Metering			
Non-compliance	Description		
<p>Audit Ref: 4.4</p> <p>With: Clause 10.13A and 4(2)(a) of Schedule 10.7</p> <p>From: 03-Dec-20</p> <p>To: 08-Dec-20</p>	<p>Submission information determined by subtraction for ICP 0000233229MPC5B for the period 03/12/20 to 08/12/20.</p> <p>Potential impact: Medium</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 because they mitigate risk to an acceptable level.</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>Review this ICP to see why both remained live for 5 days and whether there is potential for this to occur in the future.</p> <p>Inform the retailer of the situation so any correction can be made and/or compensation sought.</p>		20 August 2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As above, we believe this was a one off but will review process and look for possible improvements to prevent reoccurrence.</p>		20 August 2021	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jul-20 To: 29-Apr-21	Some records updated to the registry later than 10 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	I have recorded the controls as strong because they mitigate risk to an acceptable level. Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Whilst we strive to minimize corrections by having correct information up front, when we find them we are obliged to correct them, this often means correcting back to the previous certification date which causes it to look like the jobs were done greater than 10 business days. Late nominations from traders is still an issue causing non-compliance to MEPs.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Always looking to improve on this clause.		Ongoing
		Remedial action status
		Identified

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-Jul-20</p> <p>To: 29-Apr-21</p>	<p>Certification records not accurate and complete for most certification reports.</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 methods can be misleading and can lead to re-work.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>More scrutiny was placed on certification report information this audit and a number of missing or incorrect fields were found.</p> <p>Vector metering (VM) raised the accuracy of certification reports with test houses in our regular test house forums and provided clear requirements of what is required. All test houses are actively improving their reports to ensure the missing or incorrect fields are right going forward and SmartCo will review this going forward to ensure all comply.</p>	24 September 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Once corrected the non-compliance will be cleared until new regulations are introduced. Our regular test house forums are discussing new code requirements and ensuring we are all aware of our obligations.</p>	24 September 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-Jul-20 To: 29-Apr-21	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 because they mitigate risk to an acceptable level. 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
We are still seeing a handful of incorrect ATH identifiers coming through (VEMS), should be VCOM. We will identify the incorrect ones and remind VES (old Vircom) staff to use the correct identifier, and not accept jobs from the field with the old identifier on.		20 August 2021	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Review Invalid ATH identifier recorded. (VEMS identifier used after 28/09/2018), identify and correct these, ensure VEMS is no longer used.		20 August 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: 29-Apr-21	Discrepancies not resolved within 5 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	I have recorded the controls as strong because there is a thorough process to identify errors and steps are taken to correct errors as quickly as possible. 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
We have a thorough process where we reconcile data between our systems and the Registry daily, however some updates still occur after 5 days, often this is due to reliance on third parties.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to reconcile daily and update within the required timeframes. Chase those cases where third parties are requested for information.		Ongoing	

Cancellation of Certification			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-May-18</p> <p>To: 18-Jun-21</p>	<p>Certification cancelled, and registry not updated within 10 business days for:</p> <ul style="list-style-type: none"> • 37 ICPs with low burden, • ICP 0003860754TP8CD with an error of 32%, • ICP 0000010432TE735 with insufficient load certification where monitoring was not conducted, • 1097 ICPs not read within the maximum interrogation cycle, and • 161 ICPs where sum-check failures were not resolved within 3 business days. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three 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 most processes are managed with sufficient controls to avoid cancellation of certification.</p> <p>The installations with low burden are all recording within 2.5% therefore the impact on settlement is minor. The responsibility for SmartCo 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.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>All ICPs that haven't yet had their certification cancelled will have that done within the month.</p> <p>37 ICPs with low burden (to be cancelled)</p> <p>ICP 0003860754TP8CD with an error of 32%, (Cleared, Prevention - This was historic and new job checking will pick this up)</p> <p>ICP 0000010432TE735 with insufficient load certification where monitoring was not conducted, (we will revisit the need for a low load process as we are seeing instances where low load certification can't be avoided, i.e. unsafe to apply load banks etc)</p> <p>1097 ICPs not read within the maximum interrogation cycle. (This will be a one off due to the new code changes implemented earlier this year. We have automated our systems to change the AMI flag to N after 85 days of no communications.)</p> <p>161 ICPs where sum-check failures were not resolved within 3 business days. (We are looking at making some changes to ensure we remain compliant and we are putting reporting in place to monitor our compliance)</p>		20 August 2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
As above, new system changes, automation, and improved cert checking will detect most of the above issues and prevent reoccurrence.	20 August 2021

Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a) From: 01-Jul-20 To: 19-Jun-21	Certification expired or cancelled for 1,304 ICPs. Potential impact: High Actual impact: Medium Audit history: Twice Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement, particularly with the new data collection requirements of the Code since 1 February 2021. The impact on settlement is recorded as moderate because one installation has an error over 30%; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
All ICPs that haven't yet had their certification cancelled will have that done within the month. 37 ICPs with low burden (to be cancelled) ICP 0003860754TP8CD with an error of 32% , (Cleared, Prevention - This was historic and new job checking will pick this up) ICP 0000010432TE735 with insufficient load certification where monitoring was not conducted , (we will revisit the need for a low load process as we are seeing instances where low load certification can't be avoided, i.e. unsafe to apply load banks etc) 1097 ICPs not read within the maximum interrogation cycle. (This will be a one off due to the new code changes implemented earlier this year. We have automated our systems to change the AMI flag to N after 85 days of no communications.) 161 ICPs where sum-check failures were not resolved within 3 business days. (We are looking at making some changes to ensure we remain compliant and we are putting reporting in place to monitor our compliance)		20 August 2021
		Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>1097 ICPs not read within the maximum interrogation cycle. (This will be a one off due to the new code changes implemented earlier this year. We have automated our systems to change the AMI flag to N after 85 days of no communications.)</p> <p>161 ICPs where sum-check failures were not resolved within 3 business days. (We are looking at making some changes to ensure we remain compliant and we are putting reporting in place to monitor our compliance)</p> <p>Low burden ICPs were historic, all ATH's are now complying with the code, especially given the recent changes clarifying the need for burdening during comparative certification.</p>	20 August 2021	

Insufficient Load for Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.7</p> <p>With: Clauses 14(3) and (4) of Schedule 10.7</p> <p>From: 10-Mar-21</p> <p>To: 19-Jun-21</p>	<p>Monitoring not conducted for one ICP certified with insufficient load.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are recorded as moderate because they mitigate risk most of the time, but some issues still occur.</p> <p>The impact is minor as only one ICP is affected and accuracy is unlikely to be affected; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will revisit the need for a low load process as we are seeing instances where low load certification can't be avoided, i.e. unsafe to apply load banks etc.	24 September 2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Introduce a monitoring process for those few situations where low load certifications simply cannot be avoided.	24 September 2021	

Investigation of Faulty Metering Installations		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 18-Mar-21 To: 05-Jul-21	Trader not notified of faulty metering installation for ICP 0000373816MP18E. 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 traders are normally notified. This appears to be a one-off issue. The impact on settlement and participants is unknown so I've recorded it as minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Review this ICP and see why notification wasn't provided.		20 August 2021
Preventative actions taken to ensure no further issues will occur		Completion date
From above, identify reason as to why notification was missed, was it a human error or missing/error in process.		20 August 2021
		Investigating

Statement of Situation		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 10.46(2) From: 18-Mar-21 To: 05-Jul-21	Trader not notified of faulty metering installation for ICP 0000373816MP18E. 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 traders are normally notified. This appears to be a one-off issue. The impact on settlement and participants is unknown so I've recorded it as minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Review this ICP and see why notification wasn't provided.		20 August 2021
Preventative actions taken to ensure no further issues will occur		Completion date
From above, identify reason as to why notification was missed, was it a human error or missing/error in process.		20 August 2021
		Investigating

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8(2)(b) of schedule 10.6 From: 01-Apr-21 To: 30-Apr-21	1,097 ICPs not read within the maximum interrogation cycle. 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 because there are only 87 ICPs with a HHR profile and only two with HHR only retailers; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
This will be a one off due to the new code changes implemented earlier this year. We have automated our systems to change the AMI flag to N after 85 days of no communications. There have always been a number of ICPs where we have not changed the flag, such as inactive ICPs or disconnected/mains off sites. After discussions with the Authority and auditor, we are now aware that these must follow the same AMI flag rules as all other ICPs.		20 August 2021
Preventative actions taken to ensure no further issues will occur		Completion date
System now automated to change the AMI flag to N after 85 days of no communications.		20 August 2021
		Identified

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Jul-20 To: 19-Jun-21	1,472 examples of clock errors outside the allowable thresholds. 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
Our system automatically corrects clock errors, but unfortunately, as soon as they are out of the time limit, we become non-compliant. Any meters with excessive time errors or are repeatedly exceeding the time limits are investigated by the technical team and action is taken to resolve the issue.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have an automated system of correcting time errors. Should the time drift exceed the limits in the Code excessively or repeatedly, we will attempt to manually interrogate and make the necessary correction, and if unsuccessful, will replace the meter.	Completed	