

## Compliance plan for Intellihub Limited MEP – 2020

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 16-Jan-20 To: 21-Apr-20	Services access interface not identified for two 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	Whilst there were only two examples, the controls 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
Intellihub do not agree that that the scoring of 3 is correct for this section as we have been scored in other areas to address issues with ATH's and as a MEP, we determine the correct access interface and there is no impact to Participants. Regarding the 2 installations identified, Intellihub will address this issue with the ATH next week during our monthly governance meeting.		05/06/2020
Preventative actions taken to ensure no further issues will occur		Completion date
With respect to on-going compliance to record the service access interface, Intellihub will bring this to the ATH's attention using the examples identified and to the Customer relation manager and team leader to ensure there are no further occurrences.		05/06/2020
Identified		

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-May-19</p> <p>To: 31-Mar-19</p>	<p>All practicable steps not taken to ensure data is correct and that incorrect data is corrected as soon as practicable.</p> <p>Revised AMI data only supplied for a 15-day period.</p> <p>147 examples of incorrect timestamps for register reads.</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	
<b>Low</b>	<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.</p> <p>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. Revision data only being provided for 15 days has a minor impact on participants because the quantify of data outside the 15 days is low. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Scope of replacement outside 15 days is ~0.2% and replacement data is currently available on request. Pilot to automate push of replacement &gt; 15 days will occur in 1-2 months. On successful pilot we will offer to all customers.</p> <p>In rare circumstances where the incorrect timestamp issue occurs, the current process is to replace the meter. Intellihub is also working on a firmware fix that will resolve the root cause.</p> <p>Commentary for 6.2 is listed in 6.2 section.</p>		<p>20 July 2020</p> <p>1 Dec 2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		N/A
		Identified

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-May-19</p> <p>To: 30-Mar-20</p>	<p>304 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	
<b>Low</b>	<p>Controls are in place to manage timeliness, but improvements are required to ensure notifications from the Northpower region are provided in a timelier manner. Eight of the nine late notification examples in the sample were in the Northpower region.</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
<p>Regarding overall late MEP submissions, there was a large backlog of work in the Metering Service's Team which was a driver. The backlog has now been cleared which should improve the timeliness of Registry updates. Intellihub will add a measure of performance to our works order management system to ensure notifications from Northpower are identified and monitored.</p> <p>A field tool app has been developed, which, when rolled out to field techs, should eliminate any late field notifications. This specifically provides a field application that allows for better rate of return for paperwork and certification which will subsequently increase the time to be able to process the paperwork, certification and then to update the registry.</p>		31/07/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Staff training is ongoing and continuous monitoring and feedback</p> <p>Intellihub will continue to provide feedback to contractors to remind them of their obligations to the prompt return of paperwork.</p>		On-going
		Identified

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-May-19</p> <p>To: 30-Mar-20</p>	<p>Some records updated on the registry later than 10 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	
<b>Low</b>	<p>Whilst the level of compliance has reduced, 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.</p> <p>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.</p>	
Actions taken to resolve the issue		Completion date
<p>The process for new connections was historically lacking automation which has had an impact on our ability to update the Registry on time. As an immediate focus we have made some structural changes to put more focus on New connections specifically the timeliness of the updates to the registry and are actively monitoring this space now.</p> <p>A field tool app has been developed, which, when rolled out to field techs, should eliminate any late field notifications. This specifically provides a field application that allows for better rate of return for paperwork and certification which will subsequently increase the time to be able to process the paperwork, certification and then to update the registry.</p> <p>A process change is being considered whereby the registry will be updated immediately upon receiving the certification from the field tech, and the ATH will review and provide the certificate as required.</p>		31/07/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Staff training is ongoing and continuous monitoring and feedback</p> <p>Intellihub will continue to provide feedback to contractors to remind them of their obligations to the prompt return of paperwork.</p>		On-going
		Investigating

Accurate and Complete Records			
Non-compliance	Description		
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6 From: 01-May-19 To: 24-Apr-20	Certification records not accurate and complete for 31% of a sample of 100 Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls require strengthening to ensure record accuracy issues are identified as soon as possible. The impact is minor for most fields. Incorrect certification dates and methods can be misleading and can lead to re-work.		
Actions taken to resolve the issue		Completion date	Remedial action status
Intellihub's current governance with ATH's is being reviewed with the contractor manager with a focus on managing compliance around certifications, timeliness and we expect to tighten this in coming weeks. We are also exploring the current set up of the teams to determine if the structure is correct to maintain on-going governance. Intellihub are also reviewing our SLA management processes with ATH's and expect to have a revised solution. Intellihub will pass on the relative findings to the appropriate ATH's with the Auditor's proposed feedback.		31/12/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Regarding Certifications - The Intellihub field tool application will alleviate the issues we encounter in this space; this tool will still mean that data quality steps need to be strengthened to ensure accuracy on certifications going forward and we have a newly appointed ATH technical advisor who will do the engineering checks for all CAT2 installations.		31/07/2020	

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-May-19</p> <p>To: 30-Mar-20</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		
<b>Low</b>	<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. We 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.</p> <p>Intellihub will run our monthly reconciliation tool on a weekly basis to identify discrepancies and resolve within 5 business days.</p>		30/04/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Enhanced quality checks to ensure accuracy of information before it is submitted to the Registry.		On-going	

Correction of Errors in Registry		
Non-compliance	Description	
<p>Audit Ref: 6.3</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-May-19</p> <p>To: 30-Mar-20</p>	<p>Discrepancies not resolved within 5 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	
<b>Low</b>	<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. Certification date 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
<p>Intellihub have good controls in place to ensure no new data discrepancies are sent to the Registry. Intellihub will continue to quality check data and fix at source before updating the Registry.</p> <p>Intellihub will run our monthly reconciliation tool on a weekly basis to identify discrepancies and resolve within 5 business days.</p> <p>All tariff related issues identified in this audit have been resolved and we will address certification accuracy by running our monthly reconciliation tool more frequently.</p>		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
Per above.		On-going
		Identified

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 09-Apr-15</p> <p>To: 24-Apr-20</p>	<p>Certification not cancelled on the registry for 31 metering installations where low burden is present.</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	
<p><b>Medium</b></p>	<p>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 are weak with regard to installations with low burden.</p> <p>Previously I have recorded the impact as low because installations are within 2.5%, but the quantity of installations over recording is climbing and my sample is only a small proportion of the 2,500 installations certified since 2013. It's likely there are many hundreds of installations over recording by 0.5%.</p> <p>Assuming there were 500 installations over recording by 0.5%, this could easily result in over payment by customers of \$1.0M over a seven-year period since new part 10 came into force. I have recorded the impact as medium.</p>	
Actions taken to resolve the issue		Remedial action status



<p>This issue has been raised in previous audits. The issue of whether or not Current Transformers were being certified (when completing the Comparative Method Certification) and therefore whether burden must be taken into consideration, was identified as requiring clarification in the Code and was duly included in the Omnibus Code Consultation in 2018.</p> <p>ATH's were hopeful that with a Code Amendment, the requirements could be clarified, and that clear direction could be provided.</p> <p>It now appears from the latest communications and the EA's Compliance Timetable (which has been impacted by Covid-19), that the publication of the Code Amendments is some time away.</p> <p>In the intervening time, considerable investigation of the impact of over-recording has taken place. It is clear from the examples provided, that there are material improvements in terms of metering installation accuracy that can be achieved.</p> <p>To-date, Intellihub ATH has carried out testing of three values of nichrome wire resistors, which are intended to increase the secondary burden on a CT metering installation to a minimum of 25% of rated burden.</p> <p>In the audit commentary, reading of the recommendation is that burden should be increased to as much as 100% of rated burden in order to maximize the accuracy of the installation.</p> <p>In order to achieve this, Intellihub would need to carry out further testing on longer lengths of resistor wire (either Nichrome wire, or single continuous length of conductor).</p> <p>The recommendation to implement a simpler solution (install longer secondary cables) is in theory a simpler solution, but has the both advantages and some practical limitations as follows:</p> <ul style="list-style-type: none"> <li>• Advantage: Heat output is reduced, as it is dissipated over much greater surface area.</li> <li>• Advantage: Intermediate terminations are not introduced.</li> <li>• Disadvantage: Not all switchboards contain either sufficient space, or a suitable location in which to safely store long lengths (loops) of secondary cabling.</li> </ul> <p>At this time, with one exception, practical testing of different types of additional burden on live metering installations has not been performed. Either a working metering installation needs to be set up for testing, or an approach should be made to a Trader and approval sought to use a live installation to carry out testing.</p> <p>Documented Processes and Procedures also need to be developed.</p>	30/04/2021	Investigating
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	

<p>1. Estimate and measure burden – fix if an issue. Additionally, stock CTs with lower VA ratings. These CTs may have flying leads (not terminals) with the maximum length allowable for that particular CT's VA rating).</p> <p>2. This is a process issue – prep for it (and communicate to/from contractors if applicable)</p> <p>Intellihub will make sure that engineering checks are done for all CAT2 jobs by the recently appointed technical advisor to ensure compliance.</p> <p>10 icps identified as insufficient load will be added to the monitoring list</p>	30/04/2021	
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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: 25-Apr-20</p>	<p>Certification expired, cancelled or late for 2,983 ICPs.</p> <p>Potential impact: High</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	
<b>Medium</b>	<p>I have recorded the controls as weak because they do not appear to be as effective as in previous years, particularly for Category 2 certification and the management of low load certification. Certification has been expired for a number of years for some ICPs and most 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		Remedial action status

<p>Category 1 installations; Escalated to our customer relationship team to start working more closely with retailers and to strengthen this process so that paper trails are maintained to show correspondence between Intellihub and the retailers.</p> <p>Category 2 installations; This process will be revised to ensure that works orders are issued and proactively managed to ensure completion of certification prior to expiry.</p> <p>Our metering and field services team will work closely with our newly appointed ATH technical advisor who will help strengthen this process and ensure certification records are accurate and compliant and raise any concerns with ATH's as soon as identified.</p> <p>For installations certified with insufficient load, the required action is for these ICP's to be added to the Maximum Demand Monitoring List and for them to be monitored monthly, until such time as the minimum load specified by the certifying ATH is reached.</p> <p>6 ICPs identified as insufficient load will be added to the monitoring list</p>	30/04/2021	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Per above.	30/04/2021	

Insufficient Load for Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.7</p> <p>With: Clause 14(3) of Schedule 10.7</p> <p>From: 01-May-19</p> <p>To: 25-Apr-20</p>	<p>Monitoring not conducted for at least 20 ICPs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as weak because they do not appear to be identifying situations where insufficient load is present and where more information is required.</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
<p>Commentary has also been added to section 6.4 above.</p> <p>10 ICP's identified as insufficient load will be added to the monitoring list. Commentary also in section 7.1.</p> <p>Intellihub will work with the certifying ATH's where full certification has not taken place as demand must be monitored.</p> <p>Where the endorsement is not clear on the certifying ATH records, Intellihub will raise with the ATH's to ensure they also meet their obligations of the code.</p> <p>Intellihub will make sure that engineering checks are done for all CAT2 jobs and where monitoring is required, ensure that these are added to our Maximum Demand reports and when the minimum threshold is identified, Intellihub will work with Retailers to get access to sites to recertify.</p>		30/09/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Per above		30/09/2020
		Investigating

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 25-Apr-20	751 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	
<b>Medium</b>	I have recorded the controls as moderate in this area because certification has been expired for a number of 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
Internal process review to manage these along with those certificates that have expired, intention is to formalize a process with our internal customer relationship teams in co-ordination with the retailers.		30/04/2021
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		30/04/2021
		Investigating

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8 of Schedule 10.6 From: 01-Jan-20 To: 25-Apr-20	One ICP 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	
<b>Low</b>	Strong controls are in place to change the AMI flag to “N” if data cannot be collected. There is only one example where the update did not occur. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Scope of replacement outside 15 days is ~0.2% and replacement data is currently available on request. Pilot to automate push of replacement > 15 days will occur in 1-2 months. On successful pilot we will offer to all customers. In rare circumstances where the incorrect timestamp issue occurs, the current process is to replace the meter. Intellihub is also working on a firmware fix that will resolve the root cause.		20 July 2020
		1 Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		N/A
		Identified

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	36 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	
<b>Low</b>	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
IntelliHub do not believe there are any additional practical actions we can take to ensure the time does not exceed the allowable threshold.		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
We will look to discuss and work with the EA regards to this clause.		N/A
		Disputed

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-May-19</p> <p>To: 31-Mar-20</p>	<p>Approx. 3% of sum-check validations are conducted using estimated midnight reads because the register read is for a time other than midnight.</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	
<b>Low</b>	<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
N/A		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The type of meter in question is read on demand and cannot be programmed to read at exactly midnight. Because readings are required as at prior to end of day, reads are taken at 11.30pm. Intellihub is working on a system enhancement whereby these reads, rather than the estimated read at midnight, will be used for the sum check process. If anything this will identify some false positives for us to review. This is expected to be manageable because this type of residential sites often has very little consumption between 11.30pm and midnight. We also have the option of moving the read schedule back to 11.45pm to minimize false positive sum check failures.</p>		1 Dec 2020
		Identified