

Compliance Plan 2020

Metering Equipment Providers Electricity Invercargill and The Power Company (Managed By PowerNet Ltd)

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 16-Jan-20 To: 20-Nov-20	Information for a small number of ICPs for both TPCO and ELIN is missing or not up to date. 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	Controls are assessed as moderate. Monitoring and correction process are in place and registry data is corrected as anomalies are identified. PowerNet is committed to accurate registry data even where backdating is required with consequent non-compliance. There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
In PowerNet we believe our metering information is of a very high level, but unfortunately there are still a small number of deficiencies which are due to historic information. These can only be obtained by detailed examination within the meter boards on site. As ICPs come up for recertification the information will be collected.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Utmost accuracy is employed with all new data loaded		Ongoing	

Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 16-Jan-20 To: 20-Nov-20	ELIN/TPCO- Registry metering information updated later than 10 business days for a small percentage of metering installation records Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are assessed as strong. Monitoring and correction process are in place and registry data is corrected as anomalies are identified. PowerNet is committed to accurate registry data even where backdating is required even with the consequent non-compliance. There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The rule for timeframe for Registry updates is well understood, and every endeavour is made to comply. However, at times circumstances will be such that to comply with rules requiring complete accuracy backdating will occur.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As data continually improves less need for backdating is expected		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4</p> <p>From: 16-Jan-20 To: 20-Nov-20</p>	<p>ELIN do not have certification information for 991 Metec Q meter Installations.</p> <p>Potential impact: None</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		
<p>Low</p>	<p>Controls are assessed as moderate. This is a known industry issue. The issue is being managed and will correct itself as the meters are removed from service. There was no impact on settlement. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This is an historic situation relating to meters purchased a number of years ago. As time goes on these meters are being withdrawn from service, thus the situation is diminishing and with only 991 installations remaining it is expected to replace these during the next audit period where customer approval is granted</p>		ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>For future meter purchases certification documents are obtained. Therefore no reoccurrence is expected.</p>		N/A	

Non-compliance	Description		
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 16-Jan-20 To: 20-Nov-20</p>	<p>A relatively small number of control device discrepancies.</p> <ul style="list-style-type: none"> • 11 x ELIN LCD missing records in Registry • 118 x TPCO LCD missing records in Registry <p>Potential impact: None Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are assessed as strong because there is a robust metering database and processes in place. The issue is being managed and will correct itself as metering is upgraded and transitioned to SMCO. There was no impact on settlement. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Non-Recorded LCD:-</p> <p>ELIN 11 and TPCO 118 Installations are historic data where LCD information is missing, which we have not had visibility of in the past. This situation will be corrected as meters are replaced for recertification.</p> <p>The majority of these are modern smart meters with internal LCD, i.e. there is no separate LCD to record. We consider this is compliant, as there is no specific LCD to record.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The audit summary report has been used by PowerNet MEP Staff during the audit period and has proven to be a useful tool to assist with identifying discrepancies and ensuring these can be prioritised for correction.</p>		Ongoing Monthly Checks	

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: 16-Jan-20 To: 20-Nov-20</p>	<p>A relatively small number of ICPs with expired certification</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls are assessed as moderate because there is a robust process in place. Circumstances impacted recertification programme to some degree. The audit risk rating is recorded as low due to low number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Health and safety reasons have prevented the recertification of 2 ICP's these are waiting for remedial action by the customer. PowerNet Commercial team have prevented the recertification where the tariff code requires HHR metering. The Commercial team are in discussions with the Retailers due to network commercial requirements, 1 of these discussions has resulted in a meter change to HHR at ICP 0000176257TP8FF during this current audit period.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
MEP Responsibilities are transferred to Retailer			

Non-compliance	Description		
<p>Audit Ref: 7.15</p> <p>With: Clause 26(1) of Schedule 10.7</p> <p>From: 16-Jan-20 To: 20-Nov-20</p>	<p>A relatively small number of Meters with expired certification.</p> <p>91 Category 1 and 4 category 2 TPCO meters</p> <p>10 Elin category 2 meters</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are assessed as moderate because there is a robust process in place. Circumstances impacted the recertification programme to some degree. The audit risk rating is recorded as low due to low number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The expired Cat 2 installations is also covered in Clause 7.1 of this audit. A program of recertification of installations is underway for the remaining ICP's when recertification is required</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Certification expiry is monitored and recertification initiated.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 7.16</p> <p>With: Clause 28(1) of Schedule 10.7</p> <p>From: 16-Jan-20 To: 20-Nov-20</p>	<p>A relatively small number of CTs with expired certification.</p> <p>4 Category 2 TPCO CTs 10 Category 2 Elin CTs</p> <p>Potential impact: Low Actual impact: Low Audit history: once previously Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are assessed as moderate because there is a robust process in place. Circumstances impacted the recertification programme to some degree. The audit risk rating is recorded as low due to low number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
See comments in 7.15		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See comments in 7.15		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 7.19</p> <p>With: Clause 18 of Schedule 10.7</p> <p>From: 16-Jan-20 To: 20-Nov-20</p>	<p>203 TPCO ICPs with interim certification.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple Times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are assessed as moderate because there is a process in place to recertify. The remaining ICPs are the difficult to access. The audit risk rating is recorded as low due to low number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Recertification of expired interim certified Category 1 sites was attempted via a statistical sample method in 2016. This group of ICPs failed to achieve recertification.</p> <p>In consultation with Retailers, PowerNet engages directly with customers for meter replacement and these ICPs have been issued to an FSP for meter replacement. Attempts have been made, which to date have been unsuccessful for a variety of reasons, eg customer refusal or technical.</p> <p>Efforts continue, and progress is still made. Where issues fall completely on the customer and they will not progress any solution the ICPs and have been referred to the Retailer to provide access.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
By definition there can be no recurrence of this situation.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 8.2</p> <p>With:</p> <p>Clause 46(1) of Schedule 10.7</p> <p>From: 16-Jan-20</p> <p>To: 20-Nov-20</p>	<p>4 x category 2 installations for which TPCO is responsible were not inspected and 10 x category 2 installations for ELIN were not inspected within the applicable period.</p> <p>Potential impact: Low</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 assessed as moderate because there is a process in place to recertify. Circumstances impacted the recertification programme to some degree. The audit risk rating is recorded as low due to low number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>For Cat 2 installations inspections fall due at the same time as certification expires, therefore there is no intention to carry out inspections. Installations will be recertified as has been outlined earlier in this report. Those that have not been recertified are subject to clause 7.1</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ongoing recertification will negate the requirement for inspections			