

# MEP COMPLIANCE PLAN

## FOR ELECTRICITY INVERCARGIL LIMITED

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6  From: 16-Jan-19 To: 15-Jan-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		
<b>Low</b>	Controls are rated as moderate because there are robust procedures in place including monitoring and correction, 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.		
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		
<p>Audit Ref: 3.2 With:</p> <p>Clause 2 of Schedule 11.4</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>Metering information registry updates at MEP nomination for 4 (50%) of TPCO nominations were greater than 15 days, and for 2(100%) of ELIN metering updates were greater than 15 days.</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>Controls are rated as moderate because there are procedures in place however they were not followed. There was no impact on settlement.</p> <p>The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>These have been installations where ELIN/TPCO has been gaining MEP in a switch away from a previous MEP. Work has been carried under the retailer instructions and meter change info recorded into PowerNet's Metering Database within 1 to 3 BD of install, in readiness for populating the Registry. The issue has been created by the retailer being quite delayed in proposing the MEP switch on the Registry, and our data can only be added once that has taken place.</p> <p>Immediately the MEP nominations were received they have been accepted and metering records populated to the Registry, which results in the MEP switch being completed. With the focus of this measure being the timeliness of completing the MEP switch, we consider we have been fully compliant in taking all actions under our control to become the new MEP within the required 15 days.</p> <p>While this results in the metering data being back-dated for more than 15 days, which in itself technically is a breach, we consider our actions with respect to becoming MEP have been completely timely and therefore ELIN/TPCO are compliant.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Recent alterations in business arrangements will reduce the instances of this type of change, therefore should reduce the occurrence.		Feb 20	

Non-compliance	Description		
<p>Audit Ref: 4.3 With: <i>Clause 4(1) of Schedule 10.7</i></p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>A number of metering installation design anomalies and missing design numbers were identified in the metering installation report samples provided by PowerNet.</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>	Controls are rated as moderate because there are robust procedures in place however it appears that they were not followed. There was no impact on settlement. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
PowerNet works in conjunction with the Delta and Vircom-EMS ATH. ELIN/TPCO provide the MEP functions for category 1 and 2 metering installations only. All installations are wired in accordance with the wiring diagrams approved by ATHs. Deficiencies in metering installation documentation are noted.		Noted	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Completeness of meter installation documentation will be monitored in future.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With:</p> <p>Clause 3 of Schedule 11.4</p> <p>From: 16-Jan-19</p> <p>To: 15-Dec-19</p>	<p>ELIN/TPCO- Registry metering information updated later than 10 business days for a small percentage of metering installation records.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>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.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>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.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>As data continually improves less need for backdating is expected</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 5.1 With: 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>ELIN/TPCO do not have certification information for some Metec Q meters</p> <p>Potential impact: None</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</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 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
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.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
For future meter purchases certification documents are obtained. Therefore no reoccurrence is expected.		N/A	

Non-compliance	Description		
<p>Audit Ref: 6.2 With:</p> <p>Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>TPCO 9 x CT records and ELIN 5 x CT records not populated in the registry. Also a small number of meter register discrepancies.</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><b>Low</b></p>	<p>Controls are rated as moderate because there is a robust metering database and procedures in place. 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>Historically CT information had not been recorded for a small number of installations and can only obtained by detailed examination within the switchboard on site. As ICPs come up for recertification the information will be collected. Progress has been made during the audit period, and the remainder will fall due through the next year.</p> <p>UN not =24 UN=0 A number of meters with multiple registers with one register which is never activated, therefore its period of availability can only be "0". In this case the Channel on the Registry is set to Settlement = NO. We believe this is compliant AC020MEP18 0000565786TPF43 CN8 is identified as a data error, should be UN24 Registry has been corrected.</p> <p>0000387638TP834 Interim Certificate unable to update registry - Arranged for Meter to be changed</p> <p>0006512315TP125 Erroneously had 2 CN20 registers Registry corrected to UN24 and CN20</p> <p>ELIN</p> <p>0000921554NV308 Meter now replaced - 4/2/2020</p> <p>0000784134NVB27 CN20 Register should be UN24 Registry corrected</p> <p>AC020MEP20</p> <p>0000834381NVEAE missing registers added</p> <p>0000794500NV935 register data error corrected to UN24 (meter is single register)</p> <p>0000207595TP73A This installation has a very historic and now obsolete 3 tariff system. Presently one meter is never activated, therefore its period of availability can only be "0". In this case the Channel on the Registry is set to Settlement = NO</p> <p>AC020MEP21</p> <p>000204345TPE9E the meter has 2 registers. One register is never activated, therefore its period of availability can only be "0". In this case the Channel on the Registry is set to Settlement = NO. We believe this is compliant</p>	Ongoing	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p>Any errors or omissions are historic and there have been no previous prompts of their existence. These situations are corrected as soon as they are discovered, in many cases this is via retailer queries, eg number of dials.</p>	<p>Ongoing</p>	

<p>Audit Ref: 6.3 With:</p> <p>Clause 6 of Schedule 11.4</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>The day 13 discrepancy report process has been operating irregularly during this audit period.</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls are rated as moderate because there is a robust metering database and procedures in place. There was no impact on settlement. The audit risk rating is recorded as low.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
<p>In PowerNet we are well aware of the requirement for the day 13 comparison and carry it out as much as practical. Reconciliation is very difficult with the constant transition of installations to MEP to SmartCo and other meter movements undertaken by SmartCo directly.</p>		Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
We continue to do what we can.		Ongoing	



Non-compliance	Description		
<p>Audit Ref: 6.5 With:</p> <p>Clause 11.8A</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>ELIN 5 x CT records and 143 x Load Control Devices not recorded despite controlled registers recorded.</p> <p>TPCO 9 x CT records and 402 x Load Control Devices not recorded despite controlled registers recorded.</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><b>Low</b></p>	<p>Controls are rated as moderate because there is a robust metering database and procedures in place. 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>Missing CT information:-</p> <p>Is an historic situation which is known, and addressed when the opportunity arises for each metering installation, which has already been covered elsewhere in this report.</p> <p>Non-Recorded LCD:-</p> <p>ELIN 29 and TPCO 126 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 balance of these are modern smart meters with internal LCD, ie 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>Historic CT Data will be collected as installations are recertified.No recurrence is anticipated, all future CT installations will have full information recorded.</p> <p>Missing LCD data will be superseded by new metering information once meter replacement is completed.</p>		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 7.1 With:</p> <p>Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>424 Category 1 and 7 category 2 TPCO ICPs with expired certification. 1 Category 1 and 2 category 2 ELIN ICPs with expired certification.</p> <p>Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as moderate because there is a procedure in place however it appears that it was not followed. 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>ELIN</p> <p>0008509503NV51F Expired 14/01/20 Recertification already with a contractor under action</p> <p>0007302253NV064 Expired 6/04/19 Recertified 25/10/19</p> <p>0007350104NV691 Expired 30/06/18 Recertification has been under action for a very long period. Have made numerous attempts to gain access but the customer is not responsive. Has been referred to the retailer, but still unsuccessful.</p> <p>TPCO</p> <p>Cat 1 installations - 424 Expired</p> <p>Are those which failed statistical sample recertification in 2017. These are the tail end sites where various difficulties have prevented meter replacement, eg customer refusals (which have now been referred to retailers) or technical difficulties.</p> <p>158 Customer refusals have been referred to retailers placing responsibility on them to achieve recertification by providing access.</p> <p>Cat 2 Installations - 7 TPCO Expired:</p> <p>1 has since been recertified</p> <p>5 are under action, one proving difficult to gain access through the customer.</p> <p>1 had been Inactive for a number of years and became Active 11/11/19 without our knowledge, will be recertified</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Non-compliance	Description		
<p>Audit Ref: 7.15 With:</p> <p>Clause 26(1) of Schedule 10.7</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>7 x category 2 installations for which TPCO is responsible and 2 x category 2 installations for ELIN have expired certification. The certification method used is selected component with the CTs, meter and installation having the same certification date, expiry would occur at the same time. The meter certification will have expired.</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		
<p><b>Low</b></p>	<p>Controls are rated as moderate because there is a procedure in place however it appears that it was not followed. 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>The expired Cat 2 installations is also covered in Clause 7.1 of this audit. A program of recertification of installations is underway, with activity specific to the identified ICPs as follows:</p> <p>ELIN</p> <p>0008509503NV51F Expired 14/01/20 Recertification already with a contractor under action</p> <p>0007350104NV691 Expired 30/06/18 Recertification been under action for a very long period. Have made numerous attempts to gain access but the customer not responsive. Has been referred to the retailer, but still unsuccessful.</p> <p>TPCO</p> <p>0001231515TP025 Recertified on 23/01/2020. Delay was due to access difficulty</p> <p>0004245065TP816 Recertification under action, delayed by customer preventing access. CT information will populated on completion</p> <p>0000192505TP48D Recertification under action</p> <p>0008001128TPE1C Recertification under action. CT information will populated on completion</p> <p>0000383834TPBA1 Has been Inactive for a number of years and became Active 11/11/19 without our knowledge. Recertification to be initiated</p> <p>0000440469TP3A5 Recertification has been completed, all data still to be populated</p> <p>0000141895TP0D3 Recertification under action. CT MEO will populated on completion</p>	Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Certification expiry is monitored and recertification initiated.	Ongoing	

Non-compliance	Description		
<p>Audit Ref: 7.16 With:</p> <p>Clause 28(1) of Schedule 10.7</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>7 x category 2 installations for which TPCO is responsible and 2 x category 2 installations for ELIN have expired certification. The certification method used is selected component with the CTs, meter and installation having the same certification date, expiry would occur at the same time. The CTs have not yet been re certified.</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		
<p><b>Low</b></p>	<p>Controls are rated as moderate because there is a procedure in place however it appears that it was not followed. 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
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: 8.2 With: Clause 46(1) of Schedule 10.7</p> <p>From: 16-Jan-19 To: 15-Jan-20</p>	<p>7 x category 2 installations for which TPCO is responsible were not inspected and 2 x category 2 installations for ELIN were not inspected within the required timeframe.</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		
<b>Low</b>	<p>Controls are rated as moderate because there is a procedure in place however it appears that it was not followed. 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>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.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Ongoing recertification will negate the requirement for inspections</p>			