

Compliance plan for IntelliHUB NZ Ltd (IHUB)– 2020

Registry changes		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-Jul-19</p> <p>To: 17-Jun-20</p>	<p>724 registry updates late.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 as the process is robust and accuracy of records is required before updates occur.</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>IntelliHub have strong controls in place and ensure the quality of data is checked, validated or corrected at source prior to upload of data to the Registry.</p> <p>IntelliHub will continue to provide feedback to contractors; reminding them of their obligation for the prompt return of accurate paperwork.</p> <p>IntelliHub will continue to maintain a high level of compliance for this clause and to help maintain overall compliance with increased volumes, we are outsourcing a component of our role(s), which will help put more focus on these areas.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Staff training is ongoing with continuous monitoring of paperwork and feedback to contractors.</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>		31/12/2020
		Identified

Design and accuracy		
Non-compliance	Description	
<p>Audit Ref: 4.3</p> <p>With: Clause 4(1) of Schedule 10.7</p> <p>From: 15-May-19</p> <p>To: 30-Jul-20</p>	<p>Error and uncertainty calculations incorrect in eight Wells certification reports.</p> <p>Potential impact: Low</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>The controls are recorded as moderate because IntelliHUB did ask Wells to investigate and resolve this issue following the last audit.</p> <p>The impact on settlement and participants is minor because only one installation had an error greater than 2.5%, and certification has been cancelled for this ICP.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>As mentioned in previous audits, Intellihub checked the ATH audit reports prior to engagement with WELLS for Category 2 installations and WELLS were noted as being compliant in this area.</p> <p>Intellihub addressed Error and Uncertainty calculations with WELLS after this was identified in our 2019 audit and WELLS believed all outstanding issues had been resolved and identified according to their last Audit and that the calculations used were provided by the auditor. All feedback, including corrected paperwork and emails were then provided to the auditor.</p> <p>Certification for ICP 0000026334EAF3D has been cancelled and a revisit to site is underway to redo the prevailing load test. This is also mentioned in section 6.4.</p> <p>Intellihub believe we are not in a position to instruct an ATH on how to perform uncertainty calculations for their test equipment but will work with ATH's to address non-compliances and work with them on finding solutions.</p> <p>Intellihub agrees with the auditor that the final test results should be expressed as a range (between two values).</p> <p>Please see below regarding uncertainty calculation for Hioki 3169-20. The level of discrepancy between the auditor and the ATH is very narrow.</p>	31/12/2020	Investigating
		<p><u>Post audit comment</u></p> <p>The most recent Wells audit was conducted in November 2018 and it records non-compliance for incorrect uncertainty calculations.</p> <p>Wells provided updated calculations to the auditor in February 2019, which appeared to be accurate in theory, but when they were checked in actual certification reports during IntelliHUB's last audit they weren't accurate. Wells reported that the issue was due to the omission of the effect of the difference between reference temperature and prevailing load test temperature.</p> <p>Replacement certification reports were sent to the auditor on 25/10/19 but they weren't checked at that time; they were set aside to be addressed during the</p>

Preventative actions taken to ensure no further issues will occur	Completion date	next Wells ATH audit, however this date ended up getting extended and there still hasn't been an audit of Wells to follow up on this matter.
<p>Intellihub will work ATH's regarding the installation error range expression.</p> <p>Intellihub believe that ATH's should be audited more frequently so that Audit reports are up to date and non-compliances can be identified prior to MEP's engagement with them.</p>	31/12/2020	

Registry updates		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 17-Jun-19</p> <p>To: 25-Jun-20</p>	<p>Some late updates to registry for both new connections and a small number of corrections.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>The controls are recorded as moderate as they are being strengthened over time as the new connection process is reviewed and refined.</p> <p>There was no impact on other participants or on settlement; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>IntelliHub have strong controls in place and ensure the quality of data is checked, validated or corrected at source prior to upload of data to the Registry.</p> <p>IntelliHub will continue to provide feedback to contractors; reminding them of their obligation for the prompt return of accurate paperwork.</p> <p>IntelliHub will continue to maintain a high level of compliance for this clause and to help maintain overall compliance with increased volumes, we are outsourcing a component of our role(s), which will help put more focus on these areas.</p> <p>There is some manual work required from our works order management system to upload on Registry and this piece of work will be semi-automated on 07/08/2020 which will improve compliance timeframes in this area.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Staff training is ongoing with continuous monitoring of paperwork and feedback to contractors.</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>		31/12/2020

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, and Table 1, Schedule 11.4</p> <p>From: 17-Jun-19</p> <p>To: 25-Jun-20</p>	<p>MIC is zero for nine Delta certification reports</p> <p>Several errors in Wells Category 2 certification report</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		
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
<p>Intellihub have addressed the 1 site with WELLS and are waiting for corrected paperwork to come through.</p> <p>Intellihub have also addressed the issues identified in the DELT paperwork and certifications and this has now been resolved. DELT have also supplied new paperwork and certifications with the MIC included. We will also instruct Delta to perform quality assurance check on their paperwork before submitting to Intellihub.</p>		30/08/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Before Intellihub do further work on Category 2 installations with WELLS. Intellihub will instruct WELLS to remove the "default values" and other non-relevant entries in the certification documentation. Intellihub will also request WELLS to submit a condensed format certification report, containing only relevant data and to perform better quality assurance checks on their paperwork before submitting to Intellihub.</p> <p>Intellihub will monitor sample jobs each month to ensure we are getting the correct information through and where not applied, will be escalated immediately for resolution.</p> <p>Delta have applied a system's fix to ensure the MIC is included on all their documentation.</p>		Ongoing	

Registry accuracy		
Non-compliance	Description	
<p>Audit Ref: 6.2</p> <p>With: Clause 7 (1), (2) and (3) of Schedule 11.4</p> <p>From: 17-Jun-19</p> <p>To: 25-Jun-20</p>	<p>Small number of registry discrepancies.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 sound validations are in place. The small number of errors found were missed in the validation process.</p> <p>There was no impact on other participants or on settlement; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Intellihub have strong controls in place and ensure the quality of data is checked, validated or corrected at source prior to upload of data to the Registry.</p> <p>Intellihub will continue to provide feedback to contractors; reminding them of their obligation for the prompt return of accurate paperwork.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Intellihub will continue to engage with networks to ensure the correct validation of register content codes and period of availability is confirmed and distributed within the business to ensure accuracy and validity prior to upload on Registry.</p>		Ongoing
		Cleared

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 25-Jul-19</p> <p>To: 25-Jun-20</p>	<p>Certification not cancelled for one ICP with no burden results recorded.</p> <p>Certification cancelled, and registry not updated within 10 business days for six ICPs with low burden.</p> <p>Certification not cancelled for 2 ICPs with faulty metering.</p> <p>Potential impact: Low</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>I have recorded the controls as moderate in this area because most processes are managed with sufficient controls to avoid cancellation of certification, and certification has been cancelled in most situations where required.</p> <p>The audit risk rating is assessed to be low due to small number of ICPs affected.</p>	
Actions taken to resolve the issue		Completion date
<p>Certification for ICP 0000508302CE1A7 has been cancelled. This was certified by TRUM as ATH on 05/12/2018 and transferred over to IHUB as the MEP on 07/10/2019. Intellihub have requested corrected paperwork to be sent from FCLM.</p> <p>Certification for the 6 icps identified in the Audit where burden has not been clearly identified as being accurate or resolved has been cancelled.</p> <p>Certification for ICP 0000026334EAF3D has been cancelled and a revisit to site is underway to redo the prevailing load test.</p> <p>Certification has been cancelled for the icps where meters may be faulty. Intellihub will not attend site unless authorized by the Retailer and in both cases, the Retailer has been made aware. Both ICP's reflect "No Comms" on the Registry.</p>		05/08/2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Intellihub will proactively manage communications within the business to ensure we meet our obligations according to this part of the code.</p> <p>Actual burdening values from WELLS reports are in some instances lower than what is actually possible. This points to the incorrect measurement, equipment or process. This is also an issue for the paperwork and quality assurance checks need to be managed by the ATH before submitting to Intellihub – also mentioned in section 5.1.</p>		Ongoing
		Identified

Certification			
Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a)</p> <p>From: 27-Jul-19</p> <p>To: 25-Jun-20</p>	<p>70 ICPs with cancelled certification due the load control device being bridged.</p> <p>Certification cancelled for ICP 0000026334EAF3D due to an error greater than 2.5%.</p> <p>Certification cancelled for six ICPs with low burden.</p> <p>Certification cancelled for ICP 0000508302CE1A7 due to no burden results.</p> <p>Potential impact: Low</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>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
<p>The network fault causing the bridging issues has been an ongoing challenge, however; lately there have been trial measures taken by Powerco to rectify the issues. The time frame indicated for this solution to be rolled out across all GXP's in Tauranga is likely to be within the next 6 months.</p> <p>A solution for addressing low burden is currently being tested by a third party (Spectrum Laboratories). Once testing is completed and Intellihub are satisfied with the results; Intellihub will instruct the ATHs to return to the sites identified in this audit and address low burden, using Intellihub solution.</p> <p>Refer to section 6.4 regarding cancellation of icps identified in this audit.</p>		<p>31/01/2021</p> <p>31/12/2020</p>	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>It is possible to have ripple programs modified over the air and investigations are ongoing to test the different outcomes by using the various options within the programming software.</p> <p>The solution mentioned above will be rolled out to all ATH's that are performing Intellihub CT metering work. Intellihub will instruct the ATH's to use this solution to address low burden where there is any doubt about the accuracy of the CT's at burdens below the manufacturer's stated tolerances.</p>		31/01/2021	

Max interrogation cycle		
Non-compliance	Description	
<p>Audit Ref: 10.5</p> <p>With: Clause 8(2)(a) of Schedule 10.6</p> <p>From: 16-Jul-19</p> <p>To: 25-Jun-20</p>	<p>Maximum interrogation cycle exceeded for 96 ICPs.</p> <p>Potential impact: Low</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>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 because manual meter reading processes are in place and submission is NHH, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>It appears that there may be a timing issue as the list of 96 meters that were identified as not reading was generated in March, whereas the AMI flags for the related ICPs are set based on current read status of the ICP.</p> <p>On reviewing the 96 meters in questions we have identified that all but 5 meters are currently either reading or are flagged as AMI = "N". The remainder fit into two categories.</p> <p>The first group of 3 have multiple meters and on that basis 1 or more of these meters were reading and these had been classified as AMI = "Y" in our process. We will make an adjustment to correct this.</p> <p>The second group consists of 2 meters that have been removed since March, and the AMI Flag was correctly recorded as AMI = "N" prior to the displacement occurring and is now correctly set to "Y" because the replacement meters are reading.</p>		15 Sep 2020
Preventative actions taken to ensure no further issues will occur		Completion date
IntelliHub will review our process to ensure that the AMI Flag is set to "N" for any ICP where 1 or more meters on the site have not communicated within the MIC.		15 Sep 2020
		Investigating