

Compliance Plan for Vector Metering MEP – March 2020

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-Jun-19</p> <p>To: 13-Jan-20</p>	<p>Registry not always updated as soon as practicable.</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>Controls are recorded as moderate because there is room to improve the timeliness of registry updates.</p> <p>The impact on other participants could be moderate due to the use of potentially incorrect data, thinking it is correct; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>NGCM - Vector Metering runs a continuous reconciliation program to ensure the information between our system and the registry align. Some corrections do not meet the 5-day window particularly when additional info is requested from other parties.</p> <p>When identified, we have been actively cancelling certifications but there is still room for improvement, particularly with respect to meeting Code timeframes. We have made progress on the items addressed in section 6, these are discussed further in that section.</p> <p>AMCI – Vector Metering runs a reconciliation program to ensure the information between our system and the registry align. We are continually updating the Registry but do not always achieve this 'asap'. Whilst we believe we are mostly compliant in this area, we do accept there is room for improvement. Exception cases from the Registry for data inaccuracies are monitored and corrected daily.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

<p>Our plan is to run the reports from the Registry on a regular basis to ensure we capture and correct the issues outlined in this report. We believe the reports available from the EA, in parallel with our current reconciliation program, will greatly improve the alignment and timeliness of our updates.</p> <p>AMCI – We are looking at adding some additional field checks in the current monthly reconciliation list.</p>	ongoing	
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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-Jun-19</p> <p>To: 13-Jan-20</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: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are in place to ensure the timeliness of updates, but VM is often prevented from updating the registry due to late field notification.</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>NGCM - Like previous audit reports, retailer nominations continue to cause NGCM delays in updating the Registry, however, there were also a higher than usual number of backdates made in 2019 due to several statistical sampling programmes plus other corrections. This has had a significant hit on the percentage completed on time.</p> <p>AMCI – AMCI continues to monitor and push the FSPs to deliver paperwork in a timely fashion. We currently have a 5BD paperwork delivery target from FSP to AMCI – currently the FSPs are providing paperwork in 6BDs. AMCI also continues to request MEP nominations with Retailer SRs.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>NGCM - 2019 was a particularly busy year with stat sampling programmes and corrections. We do not expect to backdate large numbers of corrections in 2020 so the percentage completed should be back in the high 90s.</p> <p>AMCI - FSPs' current resource restructures are underway to ensure adequate back office staff to handle paperwork processing. Sub-contracted FSPs are also signing new AMA/FSP Metering Contracts – this will ensure contractual SLA/KPIs can be managed via contract management principles.</p>	Current	
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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: 01-Oct-19</p> <p>To: 13-Jan-20</p>	<p>Uncertainty higher than 0.3% for 1 Cat 4 installation certified by Delta.</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>I have recorded the controls as moderate because there is room to improve the records provided by ATHs and their processes.</p> <p>There could be a minor impact on metering installation accuracy; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
AMCI – Field work has been channelled through Vircom to Delta. Vircom will ensure that immediate remedial action is taken to recertify the site. Certification has been cancelled in Registry.		15/04/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AMCI – We believe Delta's process to be compliant. We are awaiting escalation by Vircom around the certification breach of ICP0000004199DE2DB. Additional process check by Vircom for Delta channelled work will be put in place.		Current	

Subtractive Metering		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 4(2)(a) of Schedule 10.7</p> <p>From: 01-Oct-18</p> <p>To: 21-Feb-20</p>	<p>Subtraction is used in a metering installation.</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 rated as moderate as this situation is a one-off case caused by the unique design of the HV supply to the customer.</p> <p>The impact on other participants is low as the situation was identified and a process implemented to ensure that submission volumes are correct; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
AMCI – Pioneer has escalated the outstanding issue with their Customer. The Customer is looking to further upgrade the old supply which will resolve the subtraction metering issue. AMCI has provided, via our high voltage test house AccuCal, a metering solution for the current double metering issue.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
AMCI – Due to the nature of the Customer (large hospital), AMCI has taken a mindful and careful approach in pushing the Customer to provide an opportunity to correct the issue. With Pioneer escalating the outstanding issue, AMCI believes we will finally get an outcome.		Ongoing
		Investigating

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-Jun-19</p> <p>To: 13-Jan-20</p>	<p>Some records updated to 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	
Low	<p>I have recorded the controls as moderate in this area because there is room for improvement.</p> <p>Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>NGCM: Majority of the corrections were due to the recertification of the VM cat 1 Installations that missed inspections in 2017. Certification was approved by the test house on 19 June, however, we did not have systems in place to bulk upload that many sites. It took longer than 10 business days to get these updated in the Registry.</p> <p>AMCI – Legacy NHH certification updates and other field record updates also impact the statistics. Considering these factors, statistical improvement is evident.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>NGCM - 2019 was a particularly busy year with stat sampling programmes and corrections. We do not expect to see this in 2020 and the percentage completed should be back in the high 90s.</p> <p>AMCI - We are regularly providing Retailers with ICP lists where nominations are outstanding. This is helping to improve update response times to the Registry. We continue to chase FSPs for late paperwork, which is also improving response times.</p>		Ongoing

MEP Response to Switch Notification			
Non-compliance	Description		
<p>Audit Ref: 6.1</p> <p>With: Clause 1(1) of Schedule 11.4</p> <p>From: 01-Jun-19</p> <p>To: 13-Jan-20</p>	<p>113 late MN files.</p> <p>Potential impact: Low</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>There was no impact; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NGCM - We will review why numbers have crept up since the last audit. AMCI has identified the issue below. More investigation is required.</p> <p>AMCI – As MEP, we uncovered an issue whereby our system was not receiving MEP nominations from the Registry – a process that was previously automated and working. This resulted in some MEP nomination approvals being missed. The issue is currently being investigated so it can be corrected. A work around has been implemented to prevent late nomination approvals happening going forward.</p> <p>The current process is not to approve a nomination without a formal service request from the Retailer and upfront cost approval. If the Retailer does not approve the upfront costs, we will not approve the MEP nomination whether the 10BD period has been reached or not. The 10BD obligation is not practical for all scenarios. Where the SR is upfront immediate nomination acceptance is actioned, we will send a reminder to the Retailers to send SRs and approve costs.</p>		30 April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Outcome depends on the above investigation.</p> <p>AMCI – We have implemented a work around which includes the Retailer emailing AMCI with the nomination request. This process is managed via our existing email to case system – a process that is well entrenched.</p>		30 April 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-Jun-19</p> <p>To: 13-Jan-20</p>	<p>Some registry records incomplete or incorrect.</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 in this area. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>NGCM:</p> <p>Compensation factor of 3, certified after 29/08/13: Reviewing these, we can see that there are cases where there are two metering installations on the one ICP. We have been unable to upgrade the x3 due to work being needed by the customer, however, the other metering installation has been recertified since 2013, and hence this date has been updated on the Registry. These will be cancelled.</p> <p>ICPs have IN24: This number is dropping significantly and will be cleared in 2020. We are currently correcting these in bulk.</p> <p>Residential (CN only) and Cat 2 without CTs: We are working through these; however, a significant number are old interim certified. Although we have tried, we are unable to access the site to identify the equipment on site, or upgrade.</p> <p>Invalid ATH recorded: We are working to update these. We suspect majority will be due to the switch from the old Vircom (VEMS) to VCOM participant codes.</p> <p>No control device for register content requiring a control device: The report does not appear to take into account the possibility of old expired interim legacy meters where we have been unable to get accurate information on LCDs, particularly where they are owned by the Network.</p> <p>Control device installed, register content UN: Whilst this report identifies a potential error, it does not necessarily mean there is a non-compliance. It does not take into account that some of these sites may be correct and the LCD is disconnected but remains on site (i.e. switched to gas hot water). Further investigation is required as part of our reconciliation programme.</p> <p>AMCI:</p> <p>We continue to handle exception cases daily and we have implemented a full programme of cross training to all staff to make sure inaccuracies are handled consistently. We highlighted a potential issue after a system upgrade whereby a field that would trigger the Registry update had an intermittent issue. This field is being checked as part of our Q&A process and will result in fewer cases of Registry fields not updating off our system trigger.</p>	Ongoing	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	
<p>As stated above, we will run the new reports from the Registry regularly alongside our current reconciliation reports to ensure we are capturing the above discrepancies and correcting them.</p>	Ongoing	

Correction of Errors in Registry			
Non-compliance	Description		
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Jun-19 To: 13-Jan-20	Discrepancies not resolved within 5 business days. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	I have recorded the controls as moderate in this area. There are still a small number of areas where improvement can be made. Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
NGCM - We constantly reconcile the Registry and our back-office systems and update discrepancies. However, some of these are difficult to resolve, particularly where it involves third parties, and do not happen within the 5 days stipulated. We endeavour to meet this timeframe and will continue to look for ways to improve timeliness of updates. AMCI – Daily registry case exception handling supports faster delivery of corrected information to the Registry.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We continue to look at ways to improve so we can meet the 5BD requirement		Ongoing	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Jun-19</p> <p>To: 13-Jan-20</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> • AMCI - 2 installations with inspection not conducted, • NGCM - 37 three phase installations with only one phase metered, • NGCM - 17 Category 2 installation with overdue inspection, • NGCM - 30 installations where meters were bridged, • NGCM - 25 installations with low burden, • AMCI - 12 installations with low burden, • NGCM - 127 installations certified as a lower category but monitoring report wasn't produced for July and August 2018, • NGCM - 2 Category 2 installations with inoperable test facilities, • NGCM - Uncertainty higher than 0.6% for 5 installations certified by Wells, • AMCI - Uncertainty higher than 0.3% for a Category 4 installation certified by Delta, and • AMCI – 2 Category 2 installations outside applicable accuracy tolerances. <p>Potential impact: Medium</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	
Medium	<p>I have recorded the controls as weak in this area. Many of the examples found were present during previous audits and risks are not being mitigated.</p> <p>The issues found can all potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Remedial action status
		Completion date

<p>NGCM:</p> <ul style="list-style-type: none"> As explained below, 37 three phase installations with only one phase metered have been updated mistakenly due to having more than one metering installation on one ICP. These were cancelled immediately. 17 Category 2 installation with overdue inspection were cancelled as we do not inspect Cat 2 metering for these ICPs. These ICPs were certified 15 years prior to the commencement of Part 10. 30 installations where meters were bridged are currently being cancelled. 25 installations with low burden were cancelled immediately. 127 installations certified as a lower category but with no monitoring report for July and August 2018 were cancelled. These were disputed by Vector metering in the last audit. We finally received legal notification from the EA on 3 February 2020 to cancel the certification, which was done on 17 February 2020 just prior to this audit. 2 Category 2 installations with inoperable test facilities were cancelled immediately. 5 installations with uncertainty higher than 0.6% certified by Wells were cancelled immediately. <p>AMCI:</p> <ul style="list-style-type: none"> ICP0846401681LC6F3 and 0000018651EA16B – recertification work has been actioned and current certification cancelled in Registry. ICP0000004199DE2DB – Corrective certification has been actioned with Vircom. AMCI has not been cancelling certification on sites that have blown fuses – from a Code perspective. AMCI will review our overall policy and interpretation and either cancel the certification and recertify, or provide further advice to the EA. The early and late reported inspections have been reviewed and the certification has been cancelled, where applicable. Recertification jobs have been raised. AMCI – AccuCal has reviewed its interpretation and has opted to burden sites certified under the comparative certification method. Vircom is still considering an appropriate approach. 	<p>31 March 2020</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>As stated above, we will run the new reports from the Registry regularly alongside our current reconciliation reports to ensure we are capturing the above discrepancies and correcting them.</p> <p>We have been putting greater emphasis on cancelling certifications, however, there is still room for improvement. Having the same reports, the auditors use will be a great help to us.</p>	<p>Ongoing</p>	

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: 12-Aug-14</p> <p>To: 13-Jan-20</p>	<p>Certification expired for 33,131 NGCM metering installations.</p> <p>Certification expired for 84 AMCI metering installations.</p> <p>Potential impact: High</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 in this area because certification has been expired for a number of years for some ICPs and because some 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. The audit risk rating is recorded as medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

<p>NGCM - 2,641 previously certified ICPs are not certified. 2,101 of these are unavailable to be recertified due to various issues such as retailer excluded network, HSE issues, customer refusal, etc. The certification of remaining ICPs is in progress.</p> <p>The certification of 30,480 ICPs are being actively managed and progress shared with the EA outside of this audit.</p> <p>AMCI – After reviewing the full list of sites highlighted as uncertified, the final count was 24 ICPs. In some cases, the Registry was not updated with new certification information due to a systems update issue.</p> <p>AMCI – Third parties continue to neglect taking action to certify their assets, expecting MEPs to carry the cost. Displacement is not always practical.</p> <p>AMCI – A number of sites have safety issues such as the presence of asbestos onsite or concerns over shutdowns (hospitals). The parties at these sites are unwilling/unable to provide access resulting in alt cert expiring in some cases.</p> <p>AMCI – Some customers are currently undergoing major supply and installation upgrades which means meter compliance is not being permitted or practical.</p> <p>AMCI has taken action in all cases to try to resolve non-compliances.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We are attempting to recertify the above sites but constantly run into barriers that prevent us from doing so. These barriers have been shared with the EA and we appreciate any assistance we can get to help us make these sites compliant.</p>	Ongoing	

Insufficient Load for Certification Tests			
Non-compliance	Description		
Audit Ref: 7.7 With: 14(3) and (4) of Schedule 10.7 From: 25-Oct-19 To: 20-Feb-19	Monitoring not conducted of 2 installations certified with insufficient load. Potential impact: Medium Actual impact: Low Audit history: Multiple times 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 issues found can all potentially have an impact on other participants and on settlement. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
NGCM - We are reviewing our processes to see how these jobs were accepted (we do not have a process to monitor). These should have been rejected by VM as it does not meet an approved process.		31 Mar 2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Outcome from internal investigation will determine next steps.		31 Mar 2020	

Alternative Certification Requirements		
Non-compliance	Description	
<p>Audit Ref: 7.9</p> <p>With: Clause 32(2), (3) and (4) of Schedule 10.7</p> <p>From: 06-Dec-19</p> <p>To: 21-Feb-20</p>	<p>Notification of alternative certification not provided to the market administrator.</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>The controls are recorded as moderate because 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
AMCI – Alt certs are monitored separately each month. The expiry of alt certs is not due to AMCI failing to recertify but to customers being unable to shut down due to safety concerns (e.g. Northshore Hospital). AMCI is working with these parties to resolve the issue and we have also requested assistance from the Retailers.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
AMCI – As per above.		Ongoing
		Identified

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 13-Jan-20	30,480 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	
Medium	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. The audit risk rating is recorded as medium.	
Actions taken to resolve the issue		Completion date
The 30,480 ICPs are being actively managed and progress shared with the EA outside of this audit. Any barriers to compliance have also been shared with the EA so they can assist us in achieving compliance.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We will continue working with all parties to certify non-certified ICPs, where possible.		Ongoing
		Identified

Category 2 to 5 Inspections			
Non-compliance	Description		
<p>Audit Ref: 8.2</p> <p>With: Clause 46(1) of Schedule 10.7</p> <p>From: 01-Jun-19</p> <p>To: 13-Jan-20</p>	<ul style="list-style-type: none"> 17 NGCM installations with inspection not conducted. 58 AMCI installations with inspection not conducted. <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 in this area for NGCM because reporting is in place but 17 ICPs were overlooked. AMCI's inspection controls are rated as moderate because there is a regime in place and only a small number were outside the window.</p> <p>The issues found can potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NGCM - As stated above, the 17 NGCM installations for which inspections had not been conducted have been cancelled as we do not carry out Cat 2 inspections. These were older sites that were certified for 15 years prior to the commencement of Part 10.</p> <p>AMCI – We uncovered an issue with our inspection batching report which was excluding sites with mixed assets and hence resulting in inspections not being issued for these ICPs; the report had become corrupt. Corrective action was taken which included issuing immediate recertification jobs and cancelling the certification in the Registry.</p> <p>AMCI – We monitor and inspect jobs by batch manually on a monthly cycle.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We have a new reporting tool that allows us to see ICPs that are about to expire. We will use this to identify 15-year certified Cat 2 sites that are coming up for inspection and cancel these proactively.</p> <p>AMCI – The corrupted report has been corrected.</p>		Current	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
Audit Ref: 10.5 With: Clause 8(2) of schedule 10.6 From: 01-Jun-19 To: 13-Jan-20	2,226 metering installations not read within the maximum interrogation cycle. Potential impact: Medium Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate in this area because there is room to tighten the timeframes for resolution of these matters. The impact on settlement is recorded as minor because of the low number involved; therefore, the audit risk rating for most retailers is low. For AMI only retailers, the impact would be major and the audit risk rating high.	
Actions taken to resolve the issue		Completion date
NGCM – <ul style="list-style-type: none"> 2105 ICPs were 'N' flagged just prior to the audit as our investigation has found they are unable to communicate. 1323 are inactive in the Registry and therefore we will not change these until they become active again. For the remaining handful, we are in talks with Retailers about how to resolve these. 		ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
NGCM's process works well, the table above is a back log that we have been working on with retailers for a while now to clear.		ongoing
		Identified

Time Errors for Metering Installations			
Non-compliance	Description		
<p>Audit Ref: 10.7</p> <p>With: Clause 8(4) of Schedule 10.6</p> <p>From: 01-Jun-19</p> <p>To: 13-Jan-20</p>	<p>1,308 examples of clock errors outside the allowable thresholds in the most recent reports.</p> <p>Potential impact: Medium</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 interrogation is attempted daily, and clock errors are addressed during all interrogations.</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
NGCM - Our system automatically corrects these 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.		ongoing	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 to correct, and if unsuccessful, will replace the meter.		ongoing	