

Compliance Plan for Broadspectrum MEP – January 2020

Participants to Provide Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clauses 11.2 and Clause 10.6</p> <p>From: 26-Nov-14</p> <p>To: 15-Jan-20</p>	<p>All practicable steps have not been taken to ensure information is complete and accurate.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak because they will not ensure errors are mitigated.</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
We have not knowingly provided any incorrect information, yes there are some historical problems that we are working through, these are being fixed as they are found.		On-going.
Preventative actions taken to ensure no further issues will occur		Completion date
We are currently concentrating on getting the metering installations up to date and fully certified, as part of this the registry will for these installations will be updated, after completion of the metering installation certifications, we will look into the registry validation process and get this back up and running.		On-going.
		Identified

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 17-Jul-19 To: 06-Dec-19	Records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as weak in this area because they don't seem to be sufficient to minimise late updates. The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
We are attempting to get the paperwork from subcontractors in a more timely fashion.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
We are also Starting to use our own Test House which will allow a quicker turnaround of the paperwork and subsequent updating of the registry.		Ongoing
		Identified

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: 17-Jul-18</p> <p>To: 06-Dec-19</p>	<p>Incorrect registry information.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls do not appear to be strong enough to minimise the incorrect registry updates, particularly certification and expiry dates, which drive the next inspection and certification events.</p> <p>Some incorrect dates can lead to installations not being inspected or certified, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
As installations are made compliant and recertified and the Registry updated the errors in the registry will be corrected, substantial progress has been made since the last audit.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Registry checking will start after we have completed most of the outstanding work.		Ongoing
		Identified

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Nov-18 To: 15-Jan-20	Registry validation not conducted. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	A process is not in place to validate registry data. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
As stated previously we are concentrating on getting the installations certified, then move on to the required registry checking.		On-going
Preventative actions taken to ensure no further issues will occur		Completion date
Re-instate Registry checking once all installations are fully certified.		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: 01-Nov-18</p> <p>To: 06-Dec-19</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> • 15 installations without inspections within the window, • three installations with low burden; and • monitoring not conducted for two installations certified at a lower category. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>There are processes in place to ensure that further events leading to cancellation of certification are identified. The certifications that have not been cancelled are all historical.</p> <p>The impact on settlement and participants could be moderate; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All Installations where the certification has been cancelled due to non completion of inspections and etc will have their certification expiry dates updated on the Registry. If the installations certified at a lower category cannot be recertified at the correct category then load monitoring will be started on these two site. Most of the sites that CT's under burdened have CTs that the manufacturer has stated that the CTs will still comply at a low burden. This will be checked for these three installations.		1/4/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
See Above		See Above	

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: 21-Nov-16</p> <p>To: 06-Dec-19</p>	<p>Certification expired for 13 metering installations.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Whilst reporting is in place, the controls are recorded as weak with regard to ensuring recertification is conducted prior to expiry.</p> <p>The impact on settlement or participants unknown, but these are all higher category ICPs and if any are recording inaccurately the impact will be at least moderate, therefore the audit risk rating is recorded as medium. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We are working to bring all installations up to specification, while this may not be happening as quickly as we would like, progress is being made.		On-Going	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
A technician has been appointed, to look after the requirements of the MEP role. This technician is now actively arranging for calibrations to be completed, using both subcontracted and our own Test House		On-Going	

Certification as a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 7.6</p> <p>With: Clause 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7</p> <p>From: 14-Jan-19</p> <p>To: 15-Jan-20</p>	<p>Monitoring not conducted for two installations certified at a lower category.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>As there is no process in place for monitoring the controls are recorded as weak.</p> <p>The impact on settlement and participants could be minor if the threshold was exceeded and not identified; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Broadspectrum has previously made the decision not to certify at a lower category. These installations were certified for us by others, and we failed to identify that this had happened.</p> <p>We will start monitoring these two installations for max load</p>		N/A
Preventative actions taken to ensure no further issues will occur		Completion date
Continue the policy of not downgrading installations, review existing downgraded installations for possible recertification at correct category.		1/4/2020
		Identified