

## Compliance plan for Metrix MEP – 2019

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: 29-Aug-13</p> <p>To: 29-Apr-19</p>	<p>All practicable steps not taken to ensure data is correct and that incorrect data is corrected as soon as practicable.</p> <p>Revised AMI data only supplied for a 15-day period.</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		
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made.</p> <p>Very few of the registry related discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. Revision data only being provided for 15 days has a minor impact on participants because the quantify of data outside the 15 days is low. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>Registry Data Discrepancies</b></p> <p>Metrix have good controls in place to ensure no new data discrepancies are sent to the Registry. The remaining data discrepancies may require site investigations of which we will work with the current participants for access and make the necessary updates to ensure compliance and work with participants for resolution.</p> <p><b>Revised AMI data</b></p> <p>Metrix automatically sends “catch-up” data for a period of 15 days, if data is not available and then becomes available, we will provide data beyond 15 days on request.</p>		December, 2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	

<b>Registry Data Discrepancies</b>  Metrix will continue to quality check data to ensure these are corrected at source before proceeding with the update to the Registry.	Ongoing daily	
<b>Revised AMI data</b>  Metrix is currently testing a change that would see the automated “catch-up” window extended from 15 to a minimum of 40 days; noting that we already set the AMI Flag to “N” if not reading for 40+ days.	August, 2019	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2  With: Clause 2 of Schedule 11.4  From: 01-Jul-18 To: 31-Mar-19	199 registry updates later than 15 business days.  Potential impact: Medium  Actual impact: Low  Audit history: Multiple times  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are in place to ensure the timeliness of updates, but Metrix is often prevented from updating the registry due to late nomination or late updates from traders.  The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
To minimize impact to the end consumer, Metrix will proceed with field work, provided a nomination will be triggered by the participant. Metrix will continue to quality check data to ensure these are corrected at source before proceeding with the update to the Registry to avoid further impact on participants.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Metrix will continue to work with participants to support timely updates are made to the Registry.		Ongoing
		Identified

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-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Some records updated on 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	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room to improve and shorten the notification process for new connections.</p> <p>The late updates for new connections occurred after the trader had populated their records, therefore the impact on participants, customers or settlement is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Metrix will continue to work with participants to support timely updates to the Registry for New Connections. In areas where Metrix have control of the timeliness of updates, the level of compliance is good. Historical data quality updates will continue to be updated to reach compliance, refer to section 6.2. Metrix suspect there will be minimal change to the percentage of compliance for late Registry updates until we complete data cleanse activities.		December, 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Metrix plans to implement a change in the process for New Connections where we receive the field notification from Contractors first to improve compliance.		March, 2020
		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: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Some registry records incomplete or incorrect.</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		
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made. ATH accuracy is a good example.</p> <p>Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Metrix have focused on the downward trend for data discrepancies as identified in the table above and will continue to work towards resolution for the ones that remain – Refer to “comments” section above in 6.2.		December, 2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Metrix will continue to quality check data and fix at source before updating the Registry. This will ensure that no new discrepancies will be added to the table above in section 6.2.		Daily Ongoing	

Correction of Errors in Registry		
Non-compliance	Description	
<p>Audit Ref: 6.3</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Discrepancies not resolved within 5 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	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made. Certification date accuracy is a good example.</p> <p>Very few of the discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
Metrix will continue to quality check data and fix at source before updating the Registry. Metrix have re-implemented the monthly reconciliation process which will help monitor the historical exceptions through to resolution. Refer to "comments" section 6.2 to resolve data discrepancies.		December, 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Metrix will run the reconciliation process weekly to ensure data discrepancies are identified and resolved within 5 business days to improve compliance in this area.		Ongoing
		Investigating

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 09-Apr-15</p> <p>To: 05-May-19</p>	<p>Certification not cancelled on the registry for 17 metering installations where low burden is present.</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>I have recorded the controls as moderate in this area because most processes are managed with sufficient controls to avoid cancellation of certification.</p> <p>The installations with low burden are all recording within the allowable 2.5% therefore the impact on settlement is minor. The responsibility for Metrix is to cancel certification on the registry once they know certification is cancelled and the impact of not doing this is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p><b>Bridging</b></p> <p>Metrix have focused on resolving historical issues as well as manage current bridged sites. Good processes established to capture bridged sites and cancel certification when required within compliance timeframes.</p> <p><b>Burden</b></p> <p>Metrix ATH still disputes the non-compliance associated with burden tests. This has been disputed in the last two ATH audits (2017 and 2018)</p> <p>Metrix ATH does not believe that the Code states burden is required to be added, when the comparative method of certification is used, because the Current Transformer itself is not being calibrated or certified.</p> <p>The Metrix ATH does not believe that the 2016 memo from the Electricity Authority sufficiently clarified the Code requirements, in particular, when the Comparative Method of certification is used.</p> <p>Metrix supports the need for clarity in the rules as indicated by the proposed rule amendment in the 2018 Omnibus.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
		Disputed

<p><b>Bridging</b></p> <p>Metrix will continue to utilize good process and practices in place for to capture bridged sites and cancel certification when required within compliance timeframes.</p> <p><b>Burden</b></p> <p>The planned Code Amendment referred-to above has not as yet been approved and published.</p> <p>Metrix ATH is also aware that the EA is considering a legal review of the Code clauses related to the Comparative Method of certification, and also the 2016 memo.</p> <p>There is currently a lack of industry-wide agreement regarding the efficacy of installing burden resistors.</p> <p>There is currently no Industry-Approved, commercially – available product which an ATH can purchase and install.</p> <p>In the interim, the Metrix ATH supports the formation of a technical working group. This group would include representation from ATH's and the Chief Metrologist. The group would:</p> <ul style="list-style-type: none"> <li>• Consider the pros and cons of adding burden resistors</li> <li>• The adoption of a Best Practice Installation Guideline.</li> <li>• Propose potential Code Amendments.</li> </ul> <p>The Metrix ATH is also currently in the process of investigating, designing constructing and testing a solution (component and housing), for the addition of burden, in preparation for an expected rule change.</p> <p>The solution will comprise of three resistors mounted in a sealable enclosure, securely installed on the meter panel. The enclosure will be manufactured with 2.5mm conduit wire pre-connected to the resistors, ready for installation. The technician will replace the existing yellow/white wires between the test block and the meter with the pre-wired burden box</p> <p>In developing a solution, Metrix ATH has also been developing a simple and straightforward decision - matrix for use by technicians. The inputs are 1) The VA rating of the Transformer and 2) The in-Service Burden (As Found) (results per phase). To keep the solution as simple as possible, two different levels of burden resistance are being proposed.</p>	<p>Ongoing</p>	
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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: 01-Jan-98</p> <p>To: 08-May-19</p>	<p>Certification expired, cancelled or late for 3,010 ICPs.</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		
<b>Medium</b>	<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, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p><b>Expired Certification</b></p> <p>Metrix will monitor these through RSP alerts and the reconciliation tool. Metrix have batches in place to cater for re-certification and working with participants for access to sites to have the site recertified or equipment changed with certification. Metrix are actively monitoring sites where we are unable to gain access or are challenging sites – refer to section 7.1. Metrix will re-visit the statistical sampling method to cater for the remaining sites.</p> <p><b>Statistical sampling</b></p> <p>A process was followed which the Metrix ATH believed complied with the requirements of AS1284. In this case, the minimum of 15 samples obtained were included. Additional samples were subsequently obtained but were not included. The calculation of results could have been extended to include these. It should be noted that there was no deliberate attempt made to exclude any test results. Meters were calibrated and the results added to the calculation spreadsheet in chronological order as they were received. During the same statistical sampling exercise, two other populations of Legacy meters failed due to test results which exceeded the maximum permitted errors.</p>		December, 2019	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	



<p><b>Expired Certification</b></p> <p>Metrix will monitor these through RSP alerts and the reconciliation tool. Metrix have batches in place to cater for re-certification and working with participants for access to sites to have the site recertified or equipment changed with certification. Metrix are actively monitoring sites where we are unable to gain access or are challenging sites – refer to section 7.1 and. Metrix will re-visit the statistical sampling method to cater for the remaining sites</p> <p><b>Statistical sampling</b></p> <p>Metrix ATH will ensure that future rounds of statistical sampling using the variables method will be included for all samples obtained.</p>	<p>December, 2019</p>	
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Insufficient Load for Certification Tests			
Non-compliance	Description		
<p>Audit Ref: 7.7</p> <p>With: Clause 14(3) of Schedule 10.7</p> <p>From: 27-Jul-18</p> <p>To: 19-May-19</p>	<p>Monitoring not conducted for three ICPs.</p> <p>Potential impact: Medium</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak because they do not appear to be identifying situations where insufficient load is present and where more information is required.</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>Metrix will work with the certifying ATH where full certification has not taken place as demand must be monitored. Metrix will ensure monitoring takes place when the ATH specifies on their certification report, the minimum load threshold in order for them to be able to return to site and conduct full certification tests. Before Metrix advise the certifying ATH to return to site, we will liaise with the Retailer.</p> <p>The Metrix ATH has a well-established process in place to monitor Category 2 and above installations when certificates are generated with an endorsement that demand must be monitored.</p>		August, 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Metrix will work with the certifying ATH where full certification has not taken place as demand must be monitored. Metrix will ensure monitoring takes place when the ATH specifies on their certification report, the minimum load threshold in order for them to be able to return to site and conduct full certification tests. Before Metrix advise the certifying ATH to return to site, we will liaise with the Retailer.</p>		August, 2019	

Interim Certification		
Non-compliance	Description	
<p>Audit Ref: 7.19</p> <p>With: Clause 18 of Schedule 10.7</p> <p>From: 01-Apr-15</p> <p>To: 05-May-19</p>	<p>827 ICPs with expired interim certification.</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	
<b>Medium</b>	<p>I have recorded the controls as moderate in this area because certification has been expired for a number of years for these ICPs.</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, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
Metrix will continue to data cleanse these sites and make the necessary corrections to the Registry. In some cases, Metrix have not changed certification from "I" to "F" as 'full certification' may exist but have also expired or unable to complete certification due to Retailer and Consumer turn downs. Metrix will continue to monitor these through RSP alerts, the reconciliation tool and look to having these included to the statistical sampling process.		December, 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Metrix will continue to monitor these through RSP alerts, the reconciliation tool and look to having these included to the statistical sampling process.		December, 2019
		Investigating

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Jul-18 To: 30-Apr-19	42 examples of clock errors outside the allowable thresholds in the most recent reports. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as strong because clocks are synchronized during every successful interrogation. The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Metrix ensure clocks are synchronized during each successful interrogation. Metrix will continue to advise Participants of the impacted meters and take necessary action when devices with multiple clock errors are repeated.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Metrix accepts that this is a known issue which will be ongoing for the foreseeable future.		Ongoing
		Investigating