

MEP Compliance plan for Electricity Invercargill Limited (ELIN)

Non-compliance	Description		
Audit Ref: 2.5 With: 11.2 From: 16-Jan-18 To: 15-Jan-19	Information for a small number of ICPs is missing Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made. Only a small number of ICPs are effected by this non-compliance. 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
Historically CT information had not been recorded and can only obtained by detailed examination within the switchboard 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	
No recurrence is anticipated, all future CT installations will have fully information recorded.		N/A	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 3 of Schedule 11.4</p> <p>From: 16-Jan-18</p> <p>To: 15-Jan-19</p>	<p>Registry metering data updated later than 10 business days for a small number ICPs</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		
Low	<p>Controls are rated as strong. Some metering information in the registry is backdated as part of an on-going data correction process, which PowerNet sees as important to backdate to the correct date, even if it means being later than 10 BD. 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	

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Non-compliance	Description		
Audit Ref: 5.1 With: 4(1)(b)(v) of Schedule 10.6 From: 01-Dec-16 To: 31-Dec-17	Lack of certification tests for some of Q meters Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong because there are good processes in place. ELIN/ TPCO hold accurate and complete information except for some Q meters because of circumstances outside of their control. The audit risk rating is recorded as low		
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		
Audit Ref: 6.2 With: 7(1) of Schedule 11.4 From: 16-Jan-18 To: 15-Jan-19	CT information not populated in the registry for 7 ICPs Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. 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
Historically CT information had not been recorded and can only be obtained by detailed examination within the switchboard 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	
No recurrence is anticipated, all future CT installations will have fully information recorded.		N/A	

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Non-compliance	Description		
Audit Ref: 6.5 With: 11.8A From: 16-Jan-18 To: 15-Jan-19	7 ELIN ICPs do not have CT information recorded in the registry Potential impact: Low Actual impact: Low Audit history: multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. 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
Historically CT information had not been recorded and can only be obtained by detailed examination within the switchboard 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	
No recurrence is anticipated, all future CT installations will have fully information recorded.		N/A	

Non-compliance	Description		
Audit Ref: 7.1 With: 10.38(a) From: 01-Dec-16 To: 31-Dec-17	Certification expired for 3 category 2 metering installations Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating:		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. There is improvement within cat 1 installations. 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
ELIN and TPCO The expiring Cat 2 sites have been overshadowed by PowerNet's emphasis on the Cat 1 meter replacement. These sites will be issued to and FSP for recertification.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Cat 1 - Continue efforts to recertify until all practical options are exhausted, then refer to traders. Cat 1 – Improve cognisance of upcoming expiry dates.		Ongoing	

Non-compliance	Description		
Audit Ref: 8.1 With: 45 of Schedule 10.7 From: 16-Jan-18 To: 15-Jan-19	Category 1 metering installations were not inspected in 2018 Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak TPCO and ELIN did not meet their obligations. There is minor impact on settlement outcomes because of the small number of ICPs. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Sites due for recertification were identified as at 1 November and arrangements began to issue these to inspectors in conjunction with PowerNet's meter replacement program, as Inspect and Replace. The complexities of these arrangements have delayed action on the ground and the inspections are still ongoing at the time of audit.		31/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ensure inspections are initiated earlier in the year to ensure completion within the calendar year.		31/12/2019	

Non-compliance	Description		
Audit Ref: 8.2 With: 46(1) of Schedule 10.7 From: 16-Jan-18 To: 15-Jan-19	3 category 2 installations for ELIN were not inspected Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. There was no impact on settlement outcomes. The audit risk rating is recorded as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
No Category 2 sites are inspected, they are recertified.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Ensure recertification occurs prior to expiry.		Next audit	

Non-compliance	Description		
Audit Ref: 6.2 With: From: 01-Dec-16 To: 31-Dec-17	CTs information not populated in the registry for 12 ICPs Potential impact: Low Actual impact: Low Audit history: multiple times previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. 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
Missing information relates to historic installations and has never been held by ELIN. Data will be collected when recertification of these installations is carried out and uploaded as soon as it comes to hand. Recertification of Cat 2 ICPs was to take place as SmartCo moved to Cat2 roll-out program, but it achieved minimal installations then ceased. Recertification recently began to be arranged by ELIN.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The situation is historic, all data is now loaded as site recertification is processed. This should not recur.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 6.3</p> <p>With:</p> <p>From: 01-Nov-17</p> <p>To: 31-Dec-17</p>	<p>For two months ELIN did not compare the information obtained from the registry with the MEP's own records as per this clause requirements</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>Controls are rated as moderate because there are some improvements that can be made to them. There was no impact on settlement. ELIN/TPCO check their data daily and correct when necessary. The audit risk rating is recorded as low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Ongoing daily stringent review of daily metering transactions as outlined in 2.5 is a continual monitor of metering data quality.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Implementation of a simplified process to make this reconciliation more achievable.		31/01/18	

Non-compliance	Description		
<p>Audit Ref: 6.5</p> <p>With: 11.8A</p> <p>From: 01-Dec-16</p> <p>To: 31-Dec-17</p>	<p>12 category 2 metering installations do not have CTs information recorded in the registry.</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		
Low	Controls are rated as moderate because there are some improvements that can be made to them. 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
Actions are already outlined in 6.2 where some ICPs have already been corrected, some requiring processing of data on hand and others where data will be collected at next recertification.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Missing data relates to historic metering installations. All data is now loaded as sites are processed. This should not recur.		Ongoing	

Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: 10.38(a)</p> <p>From: 01-Dec-16</p> <p>To: 31-Dec-17</p>	<p>Certification expired for 2 category 2 metering installations</p> <p>Actual impact: Low</p> <p>Audit history: three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating:</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate because there are some improvements that can be made to them. There is significant improvement within cat 1 installations. 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
As outlined in 6.2 recertification of Cat 2 ICPs was to take place as SmartCo moved to Cat2 roll-out program, but it achieved minimal installations then ceased. Recertification recently began to be arranged by PowerNet.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Recertification of expiring sites will be prioritised within ELIN's roll-out of smart meters for Cat 2 sites.		Ongoing	

Non-compliance	Description		
Audit Ref: 8.2 With: 46(1) of Schedule 10.7 From: 01-Dec-16 To: 31-Dec-17	4 category 2 installations for which ELIN is responsible were not inspected Potential impact: Low Actual impact: Low Audit history: multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate because there are some improvements that can be made to them. 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
Each will be visited for recertification. No inspections will be carried out.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Monitoring of certification expiry to ensure recertification is carried before expiry.		Ongoing	