

## Compliance plan for Broadspectrum MEP – 2019

Audit Requirement		
Non-compliance	Description	
Audit Ref: 1.11 With: Clause 10.17A & 16A.17 From: 26-Oct-15 To: 21-Nov-18	Audit completed three years late. Potential impact: High Actual impact: High Audit history: None Controls: None Breach risk rating: 12	
Audit risk rating	Rationale for audit risk rating	
High	It doesn't appear that Broadspectrum has controls in place to ensure audits are completed on time. The impact is recorded as high because the level of compliance has reduced significantly during the period since the audit was due and when it was conducted.	
Actions taken to resolve the issue		Completion date
Due to staff changes the MEP requirements were let slip with nobody actively looking after the MEP functions.		This audit has now been completed
Preventative actions taken to ensure no further issues will occur		Completion date
The intention is to allocate the MEP role to a person, this will require some training before that person is fully conversant with the requirements of this role.		28/2/2019 Plus Training
		Identified

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 26-Nov-14 To: 28-Nov-18	Services access interface not recorded for five ICPs. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. There is no impact on other participants because the location of the services access interface is not normally derived from design reports or certification records, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The latest certification checklist / design report already has a location for the service access interface to be recorded. At the end of the day the service access interface is identical for all our meters.		Previously completed
Preventative actions taken to ensure no further issues will occur		Completion date
The only action that can be assigned to this is that additional checking of the paperwork is required		Ongoing
		Identified

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: 28-Nov-18</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: 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 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
This relates back to the fact that we have not had a person fulfilling the MEP role, when this person takes on the role. These issues will be resolved. Broadspectrum has not knowingly issued incorrect information to anyone.		28/2/19
Preventative actions taken to ensure no further issues will occur		Completion date
To allocate the MEP role to a person, this will require some training before that person is fully conversant with the requirements of this role		28/2/2019 Plus Training

Design Reports for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 4.1</p> <p>With: Clause 2 of Schedule 10.7</p> <p>From: 26-Nov-14</p> <p>To: 28-Nov-18</p>	<p>Maximum interrogation cycle not recorded for 21 of 30 records</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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 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
The latest certification checklist / design report already has a location for the maximum interrogation cycle to be recorded. All the Broadspectrum's meters have a maximum interrogation cycle that is at least 4 times the normal interrogation cycle.		Previously completed
Preventative actions taken to ensure no further issues will occur		Completion date
The only action that can be assigned to this is that additional checking of the paperwork is required		Ongoing

Metering Installation Design & Accuracy																											
Non-compliance		Description																									
Audit Ref: 4.3  With: Clause 4(1) of Schedule 10.7   From: 26-Nov-14  To: 28-Nov-18		Uncertainty calculations not conducted in accordance with the Code.  Potential impact: Low  Actual impact: Low  Audit history: None  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 impact on settlement is likely to be minor; therefore, the audit risk rating is low.																									
Actions taken to resolve the issue		Completion date	Remedial action status																								
The uncertainties section of the inspection spreadsheet has been modified to include:-  <table border="1"><thead><tr><th colspan="3">load run Uncertainties</th></tr><tr><th>Source</th><th>Varh %</th><th>Wh %</th></tr></thead><tbody><tr><td>Hioki calibration (Power)</td><td>0.26</td><td>0.26</td></tr><tr><td>Clamp Calibration Uncertainty</td><td>0.13</td><td>0.13</td></tr><tr><td>Clamp Position</td><td>0.39</td><td>0.39</td></tr><tr><td>Temperature Variation For 10 degrees variation</td><td>0.3</td><td>0.3</td></tr><tr><td></td><td></td><td></td></tr><tr><td>Total</td><td>0.5715</td><td>0.5715</td></tr></tbody></table>  The temperature variation is unlikely to be any greater than 10 degrees as all the BRS installations are within buildings where the temperature during the load run will not be more than 10 degrees off from the Hioki calibration		load run Uncertainties			Source	Varh %	Wh %	Hioki calibration (Power)	0.26	0.26	Clamp Calibration Uncertainty	0.13	0.13	Clamp Position	0.39	0.39	Temperature Variation For 10 degrees variation	0.3	0.3				Total	0.5715	0.5715	Completed	Identified
load run Uncertainties																											
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Preventative actions taken to ensure no further issues will occur		Completion date																									
The new uncertainty calculation will be use going forward this will ensure that these uncertainties will be used. The original uncertainty calculation was based on conservative estimates of the uncertainties, therefore these uncertainties based on calibration reports and specifications calculate a virtually identical uncertainty. It should also be noted that metering equipment tends to run warmer than the ambient temperature.		Completed																									

Installation & Modification of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: Clauses 10.34(2), (2A) and (3)</p> <p>From: 27-May-14</p> <p>To: 28-Nov-18</p>	<p>Liaison has not occurred with traders and distributors for newly installed metering installations.</p> <p>Potential impact: Low</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	
<b>Low</b>	<p>The controls are recorded as weak because there is not a distinct process in place for this.</p> <p>There is unlikely to be any impact, because none of the parties have requested any changes to design, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
This relates back to the fact that we have not had a person fulfilling the MEP role, when this person takes on the role. These issues will be resolved.		
Preventative actions taken to ensure no further issues will occur		Completion date
As part of this whole process of getting the MEP function back up to speed procedures will need to be updated.		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: 26-Nov-14</p> <p>To: 28-Nov-18</p>	<p>Most records updated on the registry later than 10 business days.</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	
<b>Low</b>	<p>I have recorded the controls as weak in this area because they don't seem to be sufficient to minimise late updates.</p> <p>The impact on participants, customers or settlement is likely to be minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
This relates back to the fact that we have not had a person fulfilling the MEP role, when this person takes on the role. These issues will be resolved.		28/2/2019 Plus Training
Preventative actions taken to ensure no further issues will occur		Completion date
As part of this whole process of getting the MEP function back up to speed procedures will need to be updated.		ongoing
		Identified

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: 22-Dec-14</p> <p>To: 12-Jun-15</p>	<p>2 of 4 acceptances later than 10 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</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 do not appear to be sufficiently strong to minimise or eliminate late updates.</p> <p>The impact is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
This relates back to the fact that we have not had a person fulfilling the MEP role, when this person takes on the role. These issues will be resolved.		28/2/2019 Plus Training
Preventative actions taken to ensure no further issues will occur		Completion date
Training of the new person taking on the MEP role		28/2/2019 Plus Training
		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: 26-Nov-15</p> <p>To: 28-Nov-18</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		
<b>Low</b>	<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	Remedial action status
This relates back to the fact that we have not had a person fulfilling the MEP role, when this person takes on the role. These issues will be resolved.		ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		Completion date	
The reinstatement of the monthly registry checking		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: 26-Nov-14</p> <p>To: 29-Nov-18</p>	<p>Registry validation not conducted.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>A process is not in place to validate registry data.</p> <p>The impact is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>When the person who previously took on the MEP role left the organization the process that was set up to perform this function was not fully documented, this will now be revisited and reviewed when a new person is allocated the MEP role. We do record our metering information in a Lotus Noted database, but for various reasons it was not possible to set this up for the Registry checking. In the interim we are intending to do a check of the sites we are the allocated MEP for and record the calibration dates and inspection dates to identify exactly where we are at.</p>		28/2/2019 Plus Training
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The allocation of someone to the MEP role and the use of reminders.</p>		28/2/2019 Plus Training
		Identified

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 26-Nov-14</p> <p>To: 29-Nov-18</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> <li>• 27 installations without inspections within the window</li> <li>• four installations with low burden.</li> </ul> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>There is no process in place to identify ICPs where certification is cancelled.</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
While I acknowledge that we have issues in getting the inspections completed due to our lack of focus on the MEP part of our business.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Allocate the MEP role		28/2/2019 Plus Training

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: 29-Nov-18</p>	<p>Certification expired for 27 metering installations.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</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
As stated the expired certification had been identified, but due to resourcing issues in the BRS ATH we have attempted to use other ATH's with very limited success. Some sites were visited and rectified but the time frames were extended and little or no paperwork was received.		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Allocate the MEP role and continue using our own and other ATH's in an attempt to resolve this situation.		Ongoing	

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of schedule 10.7  From: 22-Jul-15 To: 29-Nov-18	Inspections not conducted within the allowable window for 27 installations. Potential impact: Medium Actual impact: Medium Audit history: Twice Controls: None Breach risk rating: 8	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	There is no process in place to ensure inspections are conducted within the inspection window.  The impact is unknown but there is a moderate risk that issues could be present and not identified, therefore the audit risk rating is recorded as medium.	
Actions taken to resolve the issue		Completion date
Allocation of someone to the MEP role and reinstatement of a system to identify when inspections are due, the existing system is currently broken as Broadspectrum is trying to replace our aging Lotus Notes system which is now not fully functional.		28/2/2019 Plus Training
Preventative actions taken to ensure no further issues will occur		Completion date
Reinstatement of a system to identify when inspections are due with reminders.		Ongoing