

Compliance plan for Contact MEP – 2019

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 06-May-14 To: 31-May-19	Some late registry updates where Contact became the MEP Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls for business as usual are strong. Late nomination by the trader was the cause of all late updates. The volume of ICPs is low, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
All records have been corrected in the registry.		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Contact will mitigate and improve via the following mechanisms: 1. We are and will continue to actively work with our Field Service Providers to emphasise the importance of providing the meter installation paperwork within the required timeframes. 2. Contact will continue to target improvements in prioritising workflow internally to ensure timely updates between our service order system and 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-Aug-18</p> <p>To: 31-Mar-19</p>	<p>Some 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: 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 registry updates occur as soon as errors are found or as soon as the correct information is confirmed.</p> <p>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
All records have been corrected in the registry		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
Contact will improve our current process by increasing the frequency the reports to every two weeks (effective from 1 July 2019)to mitigate the potential for late updates to 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: 01-Aug-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: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>I have recorded the controls as strong in this area. Sound validations are in place to ensure data is accurate.</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
Comments have been included against specific items in the Table above]		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Comments have been included against specific items in the Table above]		See comments in the Table 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: 07-Dec-17</p> <p>To: 26-Jun-19</p>	<p>Certification expired for 52 ICPs</p> <p>Potential impact: High</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 certification has been expired for a number of years for some ICPs and because all of the expired installations were fully certified at one point.</p> <p>The impact on settlement is recorded as low. There is an increased likelihood of failure or inaccuracy for metering installations with expired certification, but the numbers are low, therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact response: A number of the expired certification ICPs have since been resolved and Contact has a plan in place to remedy the remaining cases by the completion of October 2019.		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact has controls in place to monitor and maintain the certification of its assets and has the relevant programs in place to maintain the certification going forward.		Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
<p>Audit Ref: 7.10</p> <p>With: Clause 23 of Schedule 10.7</p> <p>From: 07-Aug-18</p> <p>To: 31-Aug-18</p>	<p>17 ICPs with time switches not checked within 12 months.</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>I have recorded the controls as strong in this area because Contact has processes to ensure time switches are checked every 12 months.</p> <p>The impact is low as the trader is not using the timed registers for submission, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>Contact has emailed the traders involved a new list of 13 ICP's requesting the customer's contact details to conduct a time clock inspection program for them to meet our compliance obligation of 2019.</p> <p>Contact will continue to monitor these cases and escalate to enable progress, if required.</p>		Completed
Preventative actions taken to ensure no further issues will occur		Completion date
CTCT will discuss the issue further with the trader to gain access to these installations		Ongoing

Investigation of Faulty Metering Installations		
Non-compliance	Description	
Audit Ref: 9.1 With: Clause 10.43(4) and (5) From: 01-Aug-18 To: 27-Jun-19	17 potentially defective installations not investigated within 20 business days. Potential impact: Medium 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 and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
CTCT is actively working with the Field Service Providers to produce the meter installation paperwork within our required timeframes		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
CTCT is actively working with the Field Service Providers to produce the meter installation paperwork within our required timeframes		Ongoing
		Identified