

Compliance Plan for Vector AMS MEP - August 2019

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Oct-18 To: 31-May-19	Registry not always updated as soon as practicable. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are recorded as moderate because there is room to improve the timeliness of registry updates. The impact on other participants could be moderate due to the use of potentially incorrect data, thinking it is correct; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
AMS runs a reconciliation program to ensure the information between our system and the registry align, we are continually updating the registry but do not always achieve this 'asap'. Whilst we believe we are mostly compliant in this area, we do accept there is room for improvement. AMCI – Exception cases from the Registry for data inaccuracies are monitored and corrected daily.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Review reconciliation report to ensure it is capturing all discrepancies including those listed under section 6.		Ongoing
		Identified

Payment of Costs to Losing MEP			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 10.22</p> <p>From: 01-Feb-17</p> <p>To: 19-Jul-19</p>	<p>Payment not made to the losing MEP within 20 business days.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>AMCI dispute this non-compliance. I have relied on the Authority's advice that payment is required, therefore I have recorded that controls are not in place to ensure payment is made within 20 business days.</p> <p>The impact on one other participant is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>VAMS disputes this non-compliance, The last email received from the losing MEP regarding this was the 17 October 2016. AMCI also requested a further breakdown of the initial compensation tabled (not invoiced) from FCLM to validate the chargeable amount but that was not forthcoming. Correction to audit report – no invoice was received from FCLM just a spreadsheet with an initial high-level costs breakdown - costs which we questioned and required more details on.</p> <p>There has been no further requests in the 2018 or 2019 audit period.</p> <p>We also dispute that there are no controls, VAMS pays on receipt of an invoice, as any other business would, and would pay if an invoice was ever received. Our controls are very strong for claims that follow standard commercial procedures.</p>		2017	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We will review each request for compensation on a case by case basis and if the claim meets the requirements of the code, VAMS will pay as required on receipt of an invoice. There were no claims during the 2018 audit period.</p> <p>Where practical AMCI is displacing all the 3rd party MEP assets onsite but ultimately this is controlled by the Retailer</p>		2017	

Registry Notification of Metering Records		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 2 of Schedule 11.4</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>Some registry updates later than 15 business days.</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>Controls are in place to ensure the timeliness of updates, but AMS is often prevented from updating the registry due to late field notification.</p> <p>The impact on other participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>NGCM: Updates to registry where NGCM had control were 100% within the required timeframes, only late nominations from retailers let us down.</p> <p>AMCI – AMCI continue to monitor and push the FSPs to deliver paperwork in a timely fashion. AMCI also continues to request MEP nominations with Retailer SRs. Overall the average days to update the Registry has come down from 26.6 to 18 days</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Until Retailers are forced to provide nomination on time, MEPs cannot guarantee 100% compliance. We do continue to chase retailers on a weekly basis for late nominations.</p> <p>AMCI continue to monitor and push the FSPs to deliver paperwork in a timely fashion.</p>		Ongoing
		Identified

Metering Installation Design & Accuracy			
Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: Clause 4(1) of Schedule 10.7</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>Error and uncertainty calculations not conducted correctly for 2 Category 2 metering installations certified by Wells.</p> <p>Uncertainty higher than 0.3% for 1 Cat 4 installation certified by Delta.</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		
Low	<p>I have recorded the controls as moderate because there is room to improve the records provided by ATHs and their processes.</p> <p>There could be a minor impact on metering installation accuracy; therefore, the audit risk rating is low</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NGCM: This (0.6%) was identified earlier this year during Well's ATH audit and was corrected, this is no longer an issue. The final calculated value is only used to identify a pass or fail result. As this calculation added to the value, there was never a risk to incorrectly result in a pass. At worst, there was potential to incorrectly fail a result that should have passed.</p> <p>AMCI – AMCI is working with Vircom (Delta) to review all sites certified by Delta during the audit period including the 1 x CAT4 as non-compliant.</p>		30/10/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AMCI – AMCI is seeking confirmation that Delta currently fully comply with the requirement		15/10/2019	

Subtractive Metering		
Non-compliance	Description	
<p>Audit Ref: 4.4</p> <p>With: Clause 4(2)(a) of Schedule 10.7</p> <p>From: 01-Oct-18</p> <p>To: 18-Jul-19</p>	<p>Subtraction is used in a metering installation.</p> <p>Potential impact: Medium</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 as this situation is a one-off case caused by the unique design of the HV supply to the customer.</p> <p>The impact on other participants is low as the situation was identified and a process implemented to ensure that submission volumes are correct; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
AMCI – AMCI has provided Pioneer and the Customer with a metering proposal to resolve the requirement for subtraction metering – implementation of solution depends on the Customer approving the options presented – implementation period is unknown so AMCI will be looking at requesting an Exemption from the EA in the meantime if deemed necessary.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
AMCI – AMCI are requesting more detailed technical information (SLDs) from the Retailers before work is carried out – C&I metering remains complex with multiple HSE requirements that need to be met before AMCI can conduct our routine compliance work (Eg. Hospitals, Water Treatment Plants, etc.). Legacy NZ electrical design setups hamper AMCI's ability to resolve these non-compliances easily with complexities that need to be worked through with the Retailers and their Customer. AMCI often have no control over an outcome. Exemption process needs review as AMCI do not believe that the MEP should be requesting an Exemption if the issue is Customer related.		Ongoing
Investigating		

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 02-Oct-18</p> <p>To: 31-May-19</p>	<p>Some records updated to 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	
Low	<p>I have recorded the controls as moderate in this area because there is room for improvement.</p> <p>Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>NGCM – Investigating why the average days is so high and hence, why the update % has reduced this audit period.</p> <p>AMCI – Legacy NHH certification updates also impacts the statistics. Taking into account these factors statistical improvement is evident.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We are regularly providing the Retailers with ICP lists where nominations are outstanding. This is helping to improve update response time to the Registry. We continue to chase FSPs for late paperwork, this is improving also.</p>		Ongoing

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 1(1) of Schedule 11.4 From: 01-Oct-18 To: 31-May-19	Seven late MN files. 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 are recorded as strong because they mitigate risk to an acceptable level. There was no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
		Remedial action status

<p>AMCI – Current process is not to approve a nomination without a formal service request from the Retailer and upfront cost approval – If the Retailer does not approve the upfront costs we will not approve the MEP nomination whether the 10BD period has been reached or not. The 10BD obligation is not practical for all scenarios - Where we have the SR upfront immediate nomination acceptance is actioned – We will send a reminder to the Retailers to send SRs and approve costs</p> <p>Periodic staff shortages can impact the processing of these Registry nominations.</p> <p>0000045156WEE91 – Staff shortage and training issue</p> <p>0000044051HBDB1 – Staff shortage and training issue</p> <p>1002062923LCC4B - No evidence of a formal MEP nomination received in AMCI's system</p> <p>0000043800HBD91— MEP nomination no accepted due to no quote approval from Retailer</p> <p>0000043000HR539 - No evidence of a formal MEP nomination received in AMCI's system</p> <p>0000009954CEE59 – MEP = NGCM not AMCI - ICP doesn't exist in our system. Retailer nominated us in error and reversed it (Case:01917829). We declined this nomination on 18/6/19, never accepted it (Case:01492535)</p> <p>1002055394UN661 - Staff shortage and training issue</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>AMCI – Current process generally works but as per comments above. Processing gaps due to staff shortages is being handled via cross training initiatives to makes sure all staff members can process these Registry requests across the board.</p>	Ongoing	

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-Oct-18</p> <p>To: 31-May-19</p>	<p>Some registry records incomplete or incorrect.</p> <p>Potential impact: Medium</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		
Medium	<p>I have recorded the controls as moderate in this area. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NGCM - We are constantly updating these discrepancies, some have proven to be more difficult than others. The dramatic increase in IN24 is due to previous numbers being limited by Excel to approximately 65k lines. This project is underway and we expect to clear the bulk of these by December 2019.</p> <p>AMCI – We continue to handle exception cases daily and we have implemented a full programme of cross training to all staff to make sure inaccuracies and handled consistently – With respect to the generation installation without an injection register AMCI do not believe this to be the MEP responsibility to maintain specifically where the setup in the Registry by the Network and Retailer has not included generation when the ICPs have been setup</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continue to work through these and look for opportunities to improve the speed in which they are addressed.		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-Oct-18</p> <p>To: 31-May-19</p>	<p>Discrepancies not resolved within 5 business days.</p> <p>Potential impact: Medium</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		
Medium	<p>I have recorded the controls as moderate in this area. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>As above, we constantly reconcile the registry and our back-office systems and update discrepancies however some of these are difficult to resolve, particularly where it involves third parties, and do not happen within the 5 days stipulated. We endeavour to meet this timeframe and will continue to look for ways to improve timeliness of updates.</p> <p>AMCI – Daily registry case exception handling supports faster delivery of corrected information to the Registry.</p>		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Set up regular meetings with the team undertaking these updates to ensure we are assigning the right amount of resource to meet the requirements. Instigate review of reconciliation report to ensure all the above are captured.</p> <p>AMCI – We continue to look at ways to improve so we can meet the 5BD requirement</p>		Ongoing	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>Certification cancelled, and registry not updated for:</p> <ul style="list-style-type: none"> • AMCI - 2 installations with inspections completed early; • AMCI - 8 installations with inspections completed late; • AMCI - 45 installations with inspection not conducted; • NGCM - 11 three phase installations with only one phase metered; • NGCM - 1 Category 2 installation with overdue inspection; • NGCM - 36 installations where meters were bridged; • NGCM - 8 installations with low burden; • AMCI - 12 installations with low burden; • NGCM - 127 installations certified as a lower category but monitoring report wasn't produced for July and August 2018; • NGCM - 2 Cat 2 installations with inoperable test facilities; • NGCM - Uncertainty higher than 0.6% for 5 installations certified by Wells; and • AMCI - Uncertainty higher than 0.3% for a Cat 4 installation certified by Delta. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have recorded the controls as weak in this area. Many of the examples found were present during previous audits and risks are not being mitigated.</p> <p>The issues found can all potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Remedial action status
		Completion date

<p>NGCM:</p> <ul style="list-style-type: none"> • 127 installations certified as a lower category but monitoring report wasn't produced for July and August 2018, this was due to an IT error that caused the report to not email automatically. These have been monitored each month since and all are still within the required limits. VAMS disputes the need to cancel and recertify these at significant cost when all are still accurate and fit for purpose. • X3 installations that cannot be corrected without input from the customer are UTI'd now and referred back to the Retailer. • 36 installations where meters were bridged, our bridging process has improved significantly since these were done however these have been overlooked and will be addressed. <p>AMCI</p> <ul style="list-style-type: none"> • The early and late reported inspections reported have been reviewed and the certification has been cancelled where applicable. Recertification jobs have been raised to recertify. • AMCI – With respect CAT2 sites certified via the comparative certification method the Code is not clear around the requirement to burden CAT2 CTs. AMCI requires clarification in the Code from the EA. Other than AMCI, our ATHs are also not in agreement regarding the requirement and expectation – noting that for comparative certification we are not certifying the CTs and hence our view is that as long as the site error is within the requirements set in Table 1 of Schedule 10.1, the site is accurate. • AMCI – AccuCal will be reviewing their interpretation and may opt for burdening of all sites including CAT2 but that has not been finalised formally 	<p>Ongoing</p>	<p>Disputed</p> <p>Some of the non-compliances are disputed particularly around burdening of CTs.</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	

<p>AMCI – Recertification on all sites inspected too early or too late or not at all have been actioned – we issue inspections 3 month prior to lapsing and we include the required window period to complete. We also advise our ATHs that should the inspection window lapse to recertify immediately as part of the original inspection job</p> <p>Low burdening CAT2 sites is still under review by AMCI and our affiliated ATHs</p> <p>Following the EA forum on burdening earlier this year, the EA were to get legal interpretation regarding whether CT burdening was required during comparative testing, the industry is still waiting for this interpretation from the EA in order to move forward.</p>	Ongoing	
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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: 12-Aug-14</p> <p>To: 31-May-19</p>	<p>Certification expired for 36,046 NGCM ICPs.</p> <p>Certification expired for 72 AMCI 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	
Medium	<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. The audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue		Remedial action status
		Completion date

<p>NGCM:</p> <ul style="list-style-type: none"> AMS are conducting a statistical sampling program on the 36,046 entire population. Outside of this we have been pushing hard to get these recertified but have hit many barriers that we are working through and have regularly shared with the Electricity Authority. The number is slowly decreasing. <p>AMCI:</p> <ul style="list-style-type: none"> The C&I space has limited test house resources with our two primary test houses completing work for multiple other MEP parties as well – these test houses are not able to complete the compliance volumes being issued to them by all these MEPs. Additionally, the overall compliance volumes for FY20 and 21 is up by 35% compared with previous years – this has added additional strain on already thin resources. Due to Retailers and Customer having no Code obligation to provide MEPs with timely shutdowns for primarily CT related shutdown compliance work, higher volumes of sites are falling non-complaint and that includes alternative CT certs lapsing. No order of communications with these parties easily yields resolution. Due to 3rd parties, who own revenue assets on sites where AMCI is the MEP, and have no Code obligation, actions by these parties to facilitate recertification is lacking – the options for AMCI to displace the assets is challenged in that we are not able to get approved shutdowns easily and in many cases we are having to cover the certification costs for the 3rd party owned assets with no option for compensation 	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
AMCI – We continue to proactively issue compliance work	Ongoing	

Compensation Factors		
Non-compliance	Description	
<p>Audit Ref: 7.14</p> <p>With: Clause 24(3) of Schedule 10.7</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>Incorrect compensation factors of 1 for 4 AMCI ICPs.</p> <p>Potential impact: Medium</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>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 could be minor if a trader uses the incorrect registry factor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>AMCI – A process was implemented to ensure the actual compensation factor (not unity) would be updated to the Registry – the process which was previously automated based on the Code interpretation is now manual and hence prone to mistakes</p> <p>AMCI – Where the meter has been programmed internally we are sending unity</p>		30/10/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>AMCI – Will confirm that the ICPs highlighted with unity are not related to meters internally programmed and if not, the factor will be correctly updated to the Registry</p> <p>AMCI - We will run a report to highlight any other site with unity to make sure update is corrected</p>		30/10/2019
		Identified

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: 31-May-19</p>	<p>33,977 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	
Medium	<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. The audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue		Completion date
<p>NGCM:</p> <p>As above, we are currently running a statistical sampling programme on the entire population to achieve certification.</p> <p>Certification by normal methods has been difficult and slow but is heading in the right direction.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Continue working with all parties to certify non-certified ICPs where ever possible.		Ongoing
		Identified

Category 2 to 5 Inspections			
Non-compliance	Description		
<p>Audit Ref: 8.2</p> <p>With: Clause 46(1) of Schedule 10.7</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>Inspections not conducted within the required window for:</p> <ul style="list-style-type: none"> 10 AMCI installations with inspections completed early 8 AMCI installations with inspections completed late 57 AMCI installations with inspection not conducted. <p>Potential impact: Medium</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		
Medium	<p>I have recorded the controls as moderate in this area for NGCM because reporting is in place but one ICP was overlooked. AMCI's inspection controls are rated as moderate to strong because there is a regime in place and only a small number were outside the window.</p> <p>The issues found can potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
AMCI – Recertification action has been taken on all AMCI sites where the EIPC inspection has been missed, done too early or too late		16/08/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
AMCI – We have a good forecasting tool and will continue to issue inspections in advance but will always be challenges while we have dwindling C&I test house resources		Ongoing	

Statement of Situation		
Non-compliance	Description	
Audit Ref: 9.3 With: Clause 10.46(2) From: 21-Jun-18 To: 02-Aug-19	Statement of situation not provided to the Authority within 3 business days for one ICP. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because 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
AMCI – Process has been put in place to send EA Notifications		16/08/2019
Preventative actions taken to ensure no further issues will occur		Completion date
AMCI – As per above		16/08/2019
		Identified

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.5</p> <p>With: Clause 8(2) of schedule 10.6</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>2,821 metering installations not read within the maximum interrogation cycle.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 there is room to tighten the timeframes for resolution of these matters.</p> <p>The impact on settlement is recorded as minor because of the low number involved; therefore, the audit risk rating for most retailers is low. For AMI only retailers, the impact would be major and the audit risk rating high.</p>	
Actions taken to resolve the issue		Completion date
<p>Whilst still not 100% compliant in this space we have been actively working on the backlog to reduce it. Last report was 4,932 now down 2,111 to 2,821.</p> <p>We advised the retailer in over 1,600 cases which significantly helped, and we cleared a lot of the inactive ICPs.</p> <p>We are continuing to work on the remainder of the backlog, the current process works well and is not adding to the backlog.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Continuing to work with retailers to reduce backlog		Ongoing
		Identified

Time Errors for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.7</p> <p>With: Clause 8(4) of Schedule 10.6</p> <p>From: 01-Oct-18</p> <p>To: 31-May-19</p>	<p>1,586 examples of clock errors outside the allowable thresholds in the most recent reports.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<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
VAMS has robust processes to correct time errors before they go outside the limits allowed by the code. Due to the high number of meters, sometimes these limits are breached, however the process still detects and corrects the errors.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Fully automated process, a very small percentage exceed the limits but will always be resolved.		Ongoing
		Identified

Accurate and Complete Records			
Recommendation	Description	Audited party comment	Remedial action
Regarding Clause 4(1)(a) and (b) of Schedule 10.6	<p>Require ATHs to include the following information clearly on the first page of certification records:</p> <ol style="list-style-type: none"> 1. ICP; 2. Metering installation certification date; 3. Metering installation certification expiry date; 4. Electrical connection date (if known and if the ATH is also the agent); 5. Metering Category; and 6. Certification type (selected component, comparative, fully calibrated, alternative, low load, lower category). 	2019 inspections well underway, we will look at this for next year's inspections.	Identified