

MEP Compliance Plan for The Power Company Limited (TPCO)

| 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 10 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 | |

| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| Audit Ref: 6.5 With: 11.8A From: 16-Jan-18 To: 15-Jan-19 | 10 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 | | |
|--|--|-----------------|------------------------|
| <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 423 <u>525</u> installations (cat 1) and 3 ICPs (cat 2)</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:</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 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 |
| <p>TPCO</p> <p>365 Category 1 ICPs had been fully certified at installation and had been included in the 2016 statistical sample recertification project, failed to achieve certification. They are now included in the meter replacement program.</p> <p>Expired interim certified Category 1 sites failed to achieve recertification under the statistical sample recertification project in 2016. They are now included in the meter replacement program.</p> <p>For meter replacement, in consultation with traders, PowerNet engages directly with customers for meter replacement and these ICPs have been issued to an FSP for meter replacement. Attempts have been made, which to date have been unsuccessful for a variety of reasons, eg customer refusal or technical.</p> <p>Note, progress on meter replacements is hampered by many customers opposing meter changes due to non-acceptance of smart meters. Recently customer communications have changed to emphasize the requirement for meter replacement rather than being a smart meter roll-out program. This has been quite successful.</p> <p>ELIN and TPCO</p> <p>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.</p> | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |

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| <p>Cat 1 - Continue efforts to recertify until all practical options are exhausted, then refer to traders.</p> <p>Cat 1 – Improve cognisance of upcoming expiry dates.</p> | Ongoing | |
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| Non-compliance | Description | | |
|---|--|-----------------|------------------------|
| <p>Audit Ref: 7.19</p> <p>With: 18 of Schedule 10.7</p> <p>From: 16-Jan-18</p> <p>To: 15-Jan-19</p> | <p>397-490 ICPs with expired interim certification</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</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. PowerNet on behalf of TPCO is slowly recertifying previously interim certified 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 |
| <p>Recertification of expired interim certified Category 1 sites was attempted via a statistical sample method in 2016. This group of ICPs failed to achieve recertification.</p> <p>In consultation with traders, PowerNet engages directly with customers for meter replacement and these ICPs have been issued to an FSP for meter replacement. Attempts have been made, which to date have been unsuccessful for a variety of reasons, eg customer refusal or technical.</p> <p>Efforts continue, and progress is still made. Where issues fall completely on the customer and they will not progress any solution the ICPs will be referred to the trader to provide access.</p> | | Ongoing | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| By definition this situation cannot recur. | | N/A | |

| 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 which TPCO 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 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 | |