

Compliance plan for FCLM – 2019

MEP responsibility for services access interface		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 10.9(2) From: 17-Dec-18 To: 09-Apr-19	Location of services access interface not recorded for ICP 0000371281TU8A8. Potential impact: None Actual impact: None 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. This field is not routinely used by other parties; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Notify Test house to amend the certification report		30/04/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Remind all Test Houses of the services interface requirements. Documented confirmation to be requested to ensure no further issues will occur.		30/04/2019
		Identified

Participants to Provide Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11.2 and Clause 10.6</p> <p>From: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Registry not always updated as soon as practicable in some cases.</p> <p>Statement of situation incomplete for ICP 0002221151WF237.</p> <p>Late files to retailers in December 2018 due to disk storage reaching 100%.</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 recorded as moderate because there is room to improve processes.</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>VEMS were unable to fully complete a testing portion of the Statement of situation as the metering is not fit for purpose as identified by FCLM on compliance change out.</p> <p>FCLM expect our contractors to act in a safe manner. Altering the installation may cause risk to the installation, or themselves. As such, FCLM cannot alter the installation to complete testing.</p> <p>FCLM have recommended the installation be disconnected until the issue has been resolved, as there is a current Health and Safety risk with this metering installation.</p> <p>As an MEP does not own the Electrical installation, we are currently awaiting other parties to resolve the issue with the installation to allow appropriate metering to be installed.</p> <p>FCLM put Health and Safety as a higher priority than completing a test.</p> <p>The disk storage problem had a root cause analysis done and a fix applied to prevent any further issues.</p>		30/04/2019
		Investigating
		<p>Post audit comment.</p> <p>Testing can be conducted with a temporary shutdown to connect test equipment.</p>
Preventative actions taken to ensure no further issues will occur		Completion date
These types of situations occasionally happen and need to be dealt with on a case by case basis.		Ongoing

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jul-18 To: 31-Mar-19	97 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are in place to ensure the timeliness of updates, but FCLM is often prevented from updating the registry due to late field notification. The impact on other participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
FCLM has introduced JIRA an email tracking system and reporting functions in Orion MEP database to minimise work order delays.		10/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Continue working closely with service providers to ensure we receive data on time, for example, we are streaming the workflow on the field PDA's to a single portal (per FSP) to allow for greater visibility and monitoring locally.		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-Jul-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 in this area because they reduce risk most of the time but there is still room for improvement, especially with new connection updates.</p> <p>The late updates for new connections occurred after the trader had populated their records, therefore 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
FCLM has introduced JIRA an email tracking system and reporting functions in Orion MEP database to minimise work order delays		10/07/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Continue working closely with service providers to ensure we receive data on time.		Ongoing
		Identified

Accurate and Complete Records		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1) of Schedule 10.6</p> <p>From: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Metering records not populated on registry for 11 ICPs</p> <p>Some CT information is missing for 19 ICPs</p> <p>No calibration or certification records for ICP 0002221151WF237</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 for improvement.</p> <p>There is a minor impact on other participants; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
<p>FCLM are continuing working with retailers to obtain either the metering data or access for these sites that has reduced from 30 to 11 since last audit.</p> <p>CTs information is being picked up on compliance.</p> <p>0002221151WF237 work in progress with the distributor</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Future connections require all components and their owner to be on the certification details.</p>		Ongoing
		Identified

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 22-Aug-18 To: 28-Feb-19	Nine late MN files Potential impact: Low Actual impact: None 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
MNs were updated		
Preventative actions taken to ensure no further issues will occur		Completion date
Continue to improve FCLM processes		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-Jul-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. The number of discrepancies is very small.</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
Updated discrepancies		30/04/2018
Preventative actions taken to ensure no further issues will occur		Completion date
Further enhancements to Orion database.		31/06/2019
		Identified

Cancellation of Certification			
Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Certification cancelled and registry not updated for:</p> <p>Incorrect monitoring of 5 installations certified at a lower category.</p> <p>2 installations not monitored since insufficient load certification was completed.</p> <p>17 installations not fit four purpose due to low burden</p> <p>11 installations without inspections conducted within the allowable window</p> <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 because in most cases, the registry is not populated with the correct expiry date when certification is cancelled.</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		Completion date	Remedial action status
<p>9 Cat ones updated expiry dates and they are on FCLM compliance replacement program.</p> <p>2 installations not monitored are being followed up with the test house as we do not use this method of certification, we require them to use load banks</p> <p>Cat 4 inspection early is to be recertified.</p> <p>Cat 4 inspection not done on 0005610363WM715 as it is a Generator with no water so is closed down, Will be recertified instead of inspection when load is available.</p> <p>5 cat 2 sites have been monitored correctly for over 12 months with no problems. We are having difficulty with our service providers getting these recertified. Following up as to why they are not completed as requested .One the retailer claims does not have a customer.</p> <p>Sending service requests for 3 NSPs to be recertified. These are new NSPs replacing old NSPs that were end dated on the NSP table without our knowledge.</p> <p>Following up with test houses to ensure compliance with Burden requirements.</p>			Unknown
			<p>Post audit comment</p> <p>Remedial action recorded as unknown because the proposed actions do not stipulate when the registry will be updated with the correct expiry date.</p>
Preventative actions taken to ensure no further issues will occur		Completion date	

Discuss with EA issues with both high category inspection unable to be carried out for valid reasons and how to manage NSP compliance when it is managed out of a table we have no control over.	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: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>Certification cancelled or expired for 2,558 ICPs.</p> <p>Certification expired for NSP CFM0011CBREEN.</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, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>FCLM is a 100% subsidiary of TLC and have responsibility for 34,916 ICPs nationally.</p> <p>TLC network accounts for 23,379 ICPs (67%)</p> <p>Remainder of NZ accounts for 11,537 ICPs (33%)</p> <p>TLC network summary is as per the summary attached for 1669 installations a reduction from 2,325 in 2018.</p> <p>Off network (Remainder of NZ)</p> <p>Now that major rollouts by retailers appear to be completed FCLM is in the process of Statistical sampling of the uncertified ICPs . The ICPs have been sent to the Test house grouped by meter types. We are waiting on the sample return so we can assist the Test house with customer details. The outcome is expected to certify a large number of these sites and will enable us to formulate a suitable replacement plan to remain compliant.</p>		In progress	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Orion compliance reporting identifies installations due for recertification. Work orders are created from the reports to ensure compliance is maintained.		On Going	

Insufficient Load for Certification Tests			
Non-compliance	Description		
Audit Ref: 7.7 With: 14(3) and (4) of Schedule 10.7 From: 01-Nov-17 To: 31-Mar-19	Monitoring not conducted of 2 installations certified with insufficient load. Potential impact: Medium Actual impact: Low Audit history: Multiple times 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 issues found can all potentially have an impact on other participants and on settlement. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Create work orders to load test and certify		30/04/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Revisit our requirements with service providers so they are notified to use load banks in all cases. If there is an issue to raise it with the MEP so it is not missed when it is noted on a check sheet.		31/05/2019	

Timekeeping Requirements			
Non-compliance	Description		
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Jul-18 To: 31-Mar-19	48 meters with timeclocks not checked every 12 months. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	There isn't a process in place to check the time setting on these meters. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
These are early electronic meters that are not AMI. Work orders are being processed to replace these meters.		31/07/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This meter type has not been used for several years		09/04/2019	

Compensation Factors		
Non-compliance	Description	
<p>Audit Ref: 7.14</p> <p>With: Clause 24(3) of Schedule 10.7</p> <p>From: 16-Aug-13</p> <p>To: 28-Sep-18</p>	<p>Compensation factor of 20 not recorded in the registry for ICP 0002221151WF237.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as strong because they are robust for new installations.</p> <p>The impact on settlement and participants is major; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue		Completion date
<p>The site required a statement of situation due to data supplied to FCLM from a meter owner prior to part 10 being incorrect.</p> <p>The registry was updated when the statement of situation stated a multiplier of 20 was on site.</p>		05/02/2019
		Identified
Preventative actions taken to ensure no further issues will occur		Completion date
These type of situations will always occur and need to be dealt with on a case by case basis.		Ongoing

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: 11-Apr-19</p>	<p>896 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 four 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, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>FCLM is a 100% subsidiary of TLC and have responsibility for 34,916 ICPs nationally.</p> <p>TLC network accounts for 23,379 ICPs (67%)</p> <p>Remainder of NZ accounts for 11,537 ICPs (33%)</p> <p>TLC network summary is as per the summary attached for 1669 installations a reduction from 2,325 in 2018.</p> <p>Off network (Remainder of NZ)</p> <p>Now that major rollouts by retailers appear to be completed FCLM is in the process of Statistical sampling of the uncertified ICPs. The outcome is expected to certify a large number of these sites and will enable us to formulate a suitable replacement plan to remain compliant.</p>		In Progress
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Orion compliance reporting identifies installations due for recertification. Work orders are created from the reports to ensure compliance is maintained.</p>		On Going
		Identified

Category 1 Inspections		
Non-compliance	Description	
Audit Ref: 8.1 With: Clause 45 of Schedule 10.7 From: 01-Jul-18 To: 31-Mar-19	Inspections not conducted within the allowable window for nine installations. 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 could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
9 Cat ones updated expiry dates and they are on FCLM compliance replacement program.		09/04/2019
Preventative actions taken to ensure no further issues will occur		Completion date
FCLM plans to replace all cat 1 NHH meters to AMI		Working with FSPs
		Identified

Category 2 to 5 Inspections		
Non-compliance	Description	
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 01-Jul-18 To: 31-Mar-19	Inspections not conducted within the allowable window for five installations. 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 could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
SRs sent to recertify the ICPs		31/05/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Discuss with EA issues with both high category inspection unable to be carried out for valid reasons and how to manage NSP compliance when it is managed out of a table we have no control over. In particular NSP changes.		Ongoing
		Investigating

Testing of Faulty Metering Installations			
Non-compliance	Description		
<p>Audit Ref: 9.2</p> <p>With: Clauses 10.44(1)(a) and 10.44(3)(a)</p> <p>From: 13-Mar-19</p> <p>To: 11-Apr-19</p>	<p>Testing of a faulty metering installation not conducted.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as weak because testing was originally not conducted and there were no remedial actions taken to ensure testing was subsequently conducted.</p> <p>The impact on settlement is unknown but the impact on the retailer is moderate because they don't know if the kWh they are billing and reconciling is correct.</p> <p>The audit risk rating is Medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>VEMS were unable to fully complete a testing portion of the Statement of situation as the metering is not fit for purpose as identified by FCLM on compliance change out.</p> <p>FCLM expect our contractors to act in a safe manner. Altering the installation may cause risk to the installation, or themselves. As such, FCLM cannot alter the installation to complete testing.</p> <p>FCLM have recommended the installation be disconnected until the issue has been resolved, as there is a current Health and Safety risk with this metering installation.</p> <p>As an MEP does not own the Electrical installation, we are currently awaiting other parties to resolve the issue with the installation to allow appropriate metering to be installed.</p> <p>FCLM put Health and Safety as a higher priority than completing a test.</p> <p>We are currently processing an alleged breach that will be sent to the EA once completed.</p>		26/04/2019	Investigating
			Testing can be conducted by arranging a shut-down to connect test equipment.
Preventative actions taken to ensure no further issues will occur		Completion date	
We are currently processing an alleged breach that will be sent to the EA once completed.		26/04/2019	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.5</p> <p>With: Clause 8 of Schedule 10.6</p> <p>From: 01-Jul-18</p> <p>To: 31-Mar-19</p>	<p>1,013 ICPs not read during the maximum interrogation cycle.</p> <p>Processes not in place to resolve issues preventing interrogation.</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>I have recorded the controls as weak in this area because processes have not been developed to resolve issues preventing interrogation.</p> <p>The impact on settlement is considered moderate, because some traders will be required to estimate data. The impact on traders and customers is also moderate because some customers will be required to switch retailers if AMI data is not available. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
		June 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Submission to the EA omnibus seeking clarification on the AMI communicating – non communicating process . FCLM will take action on the result of the outcome.		June 2019
		Disputed

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Mar-19 To: 09-Apr-19	Clock errors greater than the threshold for 11 ICPs. Potential impact: Low Actual impact: None 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 interrogation is attempted daily, and clock errors are addressed during all interrogations. The errors were all small and none were across a trading period, therefore there is no impact on participants or settlement. The audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Errors are looked by FCLM each Day and SRs sent to FSPs if required		
Preventative actions taken to ensure no further issues will occur		Completion date
		Disputed

Event Logs		
Non-compliance	Description	
Audit Ref: 10.8 With: Clause 8(7)(b) of Schedule 10.6 From: 01-Jul-18 To: 31-Mar-19	Event logs are not reviewed prior to being sent to retailers. Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There is no longer an event log review process. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Submission to the EA Omnibus stating we believe monitoring of event logs should sit with the retailer		
Preventative actions taken to ensure no further issues will occur		Completion date
Waiting EA review June 2019		
		Disputed