

Compliance plan for Counties Power - 2019

Non-compliance	Description		
Audit Ref: 2.5 With: 11.2 From: 01-Dec-18 To: 31-Aug-19	Some information in the registry is incorrect Potential impact: Medium Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are recorded as moderate, additional improvement should be made. Some corrections could not have been made up to now because of system restrictions. Audit risk is identified as low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Counties Power acknowledges some deficiency's in IT systems and how they interface with Registry are contributing to discrepancy's in the data set populated in Registry. Correcting errors found is an ongoing routine process.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Counties Power will utilise the new tools available in Registry to better maintain the data set. As well as short term fixes being implemented, potential for an entirely new system to interface with registry is being investigated.			

Non-compliance	Description		
Audit Ref: 4.10 With: 3 of Schedule 11.4 From: 01-Dec-18 To: 31-Aug-19	Metering data for some installations was uploaded later than 10 BD 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 recorded as moderate, a small number of entries were backdated to achieve compliance with clause 11.2. Audit risk rating is recorded as low because there is a minor, practically no, impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Generally every effort is made to meet the requirement Some upload delays incurred due to MEP nominations delays, and occasionally systems file transfer errors			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Counties Power has just (post audit) implemented the electronic capture of field metering installations data to generally speed the processes between meter installation and registry upload.		22/10/19	

Non-compliance	Description		
Audit Ref: 6.2 With: 7 (2)(3) of Schedule 11.4 From: 01-Dec-18 To: 31-Aug-19	Some registry records are incorrect 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	Controls are recorded as moderate, small improvements can be made. The audit risk rating is recorded as low because of the small number of ICPs. Some corrections could not have been made up to now because of system restrictions. Audit risk is recorded as low, minor impact on settlement outcomes.		
Actions taken to resolve the issue		Completion date	Remedial action status
With recent systems improvements, the end user of the Navision MEP database system recently has more ability to directly correct minor records errors without engaging the IT department to accomplish such tasks.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
An better system to interface and make corrections to the Registry is a focus of the MEP and IT Management teams for 2020			

Non-compliance	Description		
Audit Ref: 7.1 With: Clause 10.38(a) From: 01-Dec-18 To: 31-Aug-19	1,713 ICPs have non-certified metering installations 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 certification for some metering installations has been expired for number of years. We assigned audit risk rating as medium because of increased possibility of failure or inaccuracy is steadily increasing, which could have an impact on settlement outcomes.		

Actions taken to resolve the issue	Completion date	Remedial action status
		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Counties Power has recently engaged another Test House to assist with undertaking the higher Category 2 annual compliance program that slipped behind schedule in the second quarter due to resource constraints</p> <p>Reasonable success to date resolving the category 1 compliance issues - each now on a case by case basis, with no regard to expense, and implemented solutions to a number of technical constraints.</p> <p>Noting we cannot forcibly make access on to private property to carry out compliance work where customers are uncooperative, or else present a danger to staff.</p> <p>Whilst will be a major key focus over next 12 month period an exact date could not be estimated for completion of this program or work - unless the Network was to elect to simply disconnect non-compliant metered ICPs.</p>		

Non-compliance	Description		
<p>Audit Ref: 7.19</p> <p>With: 18 of Schedule 10.7</p> <p>From: 01-Dec-18</p> <p>To: 31-Aug-19</p>	<p>1,109 ICPs metering installations have interim certification</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>Controls are recorded as moderate because certification for some metering installations has been expired for number of years. We assigned audit risk rating as medium because of increased possibility of failure or inaccuracy is steadily increasing, which could have an impact on settlement outcomes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Counties Power is continuing efforts to reduce these outstanding legacy metering installations.</p> <p>We are actively engaging with the customers and their associated Retailers in order to negotiate access and or approval to carry out the work at the customers property where this is the applicable reason for non-completion.</p> <p>Mounting meters on poles or in street pillars has been investigated, but at this point is considered a last resort</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We have requested Retailers not to reconnect disconnected ICPs with expired metering installations. Additional resources have been recruited into the metering team to resolve where possible the miscellaneous technical issues remaining preventing metering installs.</p>			

Non-compliance	Description		
<p>Audit Ref: 10.5</p> <p>With: 8(2) of Schedule 10.6</p> <p>From: 01-Dec-18</p> <p>To: 31-Aug-19</p>	<p>Some metering installations not interrogated within maximum interrogation cycle (540)*</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice before</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are recorded as moderate an improvements can be made. The reports from Metrix are in place but still more work has to be done to ensure successful interrogation. The impact on settlement is recorded as moderate because some retailers will be required to estimate data or arrange manual reads. The audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>*Note The meters with data not obtained within interrogation cycles don't pertain the large Commercial and Industrial category HHR metering installations</p> <p>Current data attainment from the overall smart meter fleet (encompassing Cat 1 and 2) is consistently close to 99% successful across Counties Powers Network. Some unreachable meters are physically removed or replaced, and the reporting will flag these until the removal paperwork catches up.</p> <p>While failure of the sensitive electronics associated in delivering AMI data is to be expected in some cases, the field investigations to date in the majority of cases point to deenergised metering installations being the root cause of communications failures (resulting in data not being retrieved within interrogation cycles).</p> <p>These may be vacant property's, holiday houses, or metering for seasonally used agricultural equipment such as irrigation pumps.</p> <p>We have encouraged customers directly, and also Retailers to remind their customers remote reads cannot be obtained from deenergised meters, and to isolate their electricity supply at the distribution board - and not the metering panel isolator.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>Counties Power has been approaching this problem in two ways.</p> <p>A radio infrastructure improvement project has successfully enhanced the communications coverage in the remote rural areas of the network to improve the data attainment.</p> <p>The IT systems enhancements for automation to properly manage the AMI communications flag in Registry are in development, but not unfortunately were not yet operational at the time of audit.</p>		
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Non-compliance	Description		
<p>Audit Ref: 10.7</p> <p>With: 8(4) of Schedule 10.6</p> <p>From: 01-Dec-18</p> <p>To: 31-Aug-19</p>	<p>Around 50 meters are reported every two weeks as having clock errors outside the allowable threshold</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 recorded as strong . A very small percentage of meters have a clock error outside the allowable threshold . The audit risk rating is recorded as low because it is a small number of ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>If the meter is communicating regularly then any drift will automatically be corrected by the communications network within compliance limits. Therefore despite battery backed up timekeeping within the meter - long periods of non-communication would prevent the system from syncing increasing the possibility of the clock drifting outside of compliance limits.</p> <p>Other than initial time syncs following new installations, the cause of other miscellaneous meter time clock errors are attributable to actual Network power outages and or disconnected ICPs / meters being re-livened and re-joining the Network.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>There does not appear to be an action Counties power could make to improve the technology deployed. It is hoped the recent move to remote (soft) disconnections and reconnections on the Network using the smart meters internal disconnect will alleviate this symptom - as the meters themselves will remain energised and receiving the regular clock synchronisations.</p>			