

Compliance plan for Delta MEP – 2019

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 18-Mar-19 To: 19-Mar-19	Registry update one day late for one ICP. Potential impact: Low 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
Updating the registry in a timely manner has been affected by the fact that one person only processes DELT MEP certification documentation. An additional person is going to be trained to process this documentation, ensuring paperwork is completed in a timely manner regardless of any one person's schedule.		30-09-2019
Preventative actions taken to ensure no further issues will occur		Completion date
Updating the registry in a timely manner has been affected by the fact that one person only processes DELT MEP certification documentation. An additional person is going to be trained to process this documentation, ensuring paperwork is completed in a timely manner regardless of any one person's schedule.		30-09-2019
		Identified

Non-compliance	Description		
<p>Audit Ref: 4.3</p> <p>With: Clause 4(1) of Schedule 10.7</p> <p>From: 29-Aug-13</p> <p>To: 01-Apr-19</p>	<p>Error and uncertainty calculations not conducted correctly for 27 Category 2 metering installations.</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>Delta has resolved this matter and the controls are now strong.</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
Delta have resolved this issue and now calculate uncertainty based on industry standard using MSL calculator.		NOW	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Delta will continue to use our new methodology when calculating uncertainty in the future.		NOW	

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-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: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have recorded the controls as weak because they do not mitigate risk most of the time.</p> <p>The only impact of these backdated updates is that it will be difficult to determine which devices were installed during any given period, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
A backlog of CT work was created while our working standard had repeatability tests completed to determine the true uncertainty value. We have also experienced a staff change which has exacerbated the problem. Now that the working standard has been successfully calibrated, info sheets updated and key staff replaced – work should be completed in a timely manner		NOW
Preventative actions taken to ensure no further issues will occur		Completion date
A backlog of CT work was created while our working standard had repeatability tests completed to determine the true uncertainty value. We have also experienced a staff change which has exacerbated the problem. Now that the working standard has been successfully calibrated, info sheets updated and key staff replaced – work should be completed in a timely manner		NOW
		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-May-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: 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. There are still a small number of areas where improvement can be made.</p> <p>Some of the discrepancies have a minor impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Aurora in conjunction with the DELT MEP are investigating the incomplete and incorrect records in the registry and Gentrack. Any discrepancies will be addressed as found.		30-09-2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Aurora in conjunction with the DELT MEP are investigating the incomplete and incorrect records in the registry and Gentrack. Any discrepancies will be addressed as found.		30-09-2019	

Certification and Maintenance		
Non-compliance	Description	
<p>Audit Ref: 7.1</p> <p>With: Clause 10.38 (a)</p> <p>From: 01-Jul-18</p> <p>To: 14-Jun-19</p>	<p>Certification expired for 3 ICPs.</p> <p>Certification late for 12 ICPs.</p> <p>Certification cancelled for 19 ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>I have recorded the controls as weak in this area because they do not appear to be achieving certification on time for many ICPs and certification is cancelled for 19 ICPs.</p> <p>The impact on settlement is recorded as low because no inaccuracies were found; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
A backlog of CT work was created while our working standard had repeatability tests completed to determine the true uncertainty value. We have also experienced a staff change which has exacerbated the problem. Now that the working standard has been successfully calibrated, info sheets updated and key staff replaced – work should be completed in a timely manner.		NOW
Preventative actions taken to ensure no further issues will occur		Completion date
A backlog of CT work was created while our working standard had repeatability tests completed to determine the true uncertainty value. We have also experienced a staff change which has exacerbated the problem. Now that the working standard has been successfully calibrated, info sheets updated and key staff replaced – work should be completed in a timely manner		NOW
		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: 14-Jun-19	7 Category 2 inspections not conducted. Potential impact: Medium Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There isn't a monitoring process in place for identification of inspections due. The impact on settlement and participants is unknown. I've given a low audit risk rating based on the assumption that significant issues, such as phase failure, will have been identified by trader's validation processes.	
Actions taken to resolve the issue		Completion date
Due to the low number of inspections required to be completed for the Delta MEP, these sites will simply be recertified which will nullify the need for inspection now or in the future.		30-09-2019
Preventative actions taken to ensure no further issues will occur		Completion date
Due to the low number of inspections required to be completed for the Delta MEP, these sites will simply be recertified which will nullify the need for inspection now or in the future.		30-09-2019
		Identified