

Compliance plan for Delta MEP - 2018

Metering Installation Design & Accuracy			
Non-compliance	Description		
Audit Ref: 4.3 With: Clause 4(1) of Schedule 10.7 From: 29-Aug-13 To: 06-Jun-18	Error and uncertainty calculations not conducted correctly for up to 50 Category 2 metering installations. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: None Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	Delta disputed this matter for many years and did not change practices to ensure compliance was achieved. There were therefore no controls in place to ensure compliance. There could be a minor impact on metering installation accuracy; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Delta have obtained the latest MSL uncertainty calculator. Delta will utilize this to include additional uncertainty due to temperature.		3-9-18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Delta have obtained the latest MSL uncertainty calculator. Delta will utilize this to include additional uncertainty due to temperature.		3-9-18	

Changes to Registry Records	
Non-compliance	Description
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jan-17 To: 30-Apr-18	Some records updated to the registry later than 10 business days. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3
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	Remedial action status
Delta will make contact with Gentrack to discuss if this is a generic problem and ways to resolve this technical issue.		3-9-18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Delta will make contact with Gentrack to discuss if this is a generic problem and ways to resolve this technical issue.		3-9-18	

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-Jan-17</p> <p>To: 30-Apr-18</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
Delta are working with the data administrator to resolve discrepancies highlighted in the table.		3-9-18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Delta are working with the data administrator to resolve discrepancies highlighted in the table.		3-9-18	

Certification and Maintenance			
Non-compliance	Description		
Audit Ref: 7.1 With: Clause 10.38 (a) From: 01-Jan-17 To: 31-May-18	Certification expired for five ICPs. Certification late for 7 of 10 ICPs. Potential impact: High Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as weak in this area because certification has been expired for a number of months for some ICPs and the controls do not appear to be achieving certification on time for most ICPs. The impact on settlement is recorded as low because no inaccuracies were found; therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
CT trained staff have caught up on overdue work and expired sites.		2-7-18	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Delta produce a report from Gentrack containing all ICPs that are due to expire in the next 90 days. Work is planned and completed in a timely manner. Additional staff will be trained to perform CT work resulting in no staff shortage and work being completed on time.		2-7-18	