

Compliance Plan for Contact MEP – 2018

Changes to Registry Records			
Non-compliance	Description		
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Sep-17 To: 31-Jul-18	Some records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	I have recorded the controls as strong in this area. The impact on participants, customers or settlement is minor, therefore the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
All records have been updated to the registry accordingly		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Although CTCT has controls in place for this area of non-compliance we will review why some records were not updated within 10 business days and make amendments to our processes and controls to strengthen this area.		31/12/2018	

Provision of Registry Information			
Non-compliance	Description		
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Sep-17 To: 31-Jul-18	Some registry records incomplete or incorrect. 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	<p>I have recorded the controls as strong in this area. Completion of the statistical recertification of meters will improve the numbers.</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	Remedial action status
Comments have been included in the Table above		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Comments have been included in the Table above		Ongoing	

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: 12-Aug-14</p> <p>To: 31-Jul-18</p>	<p>Certification expired for 5423 ICPs</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>Issue 1: 5,344 interim certified installations not re-certified, these assets have been sold to LMGL (which was inferred we could do as per our EA settlement agreement conditions) but a retailer has refused to make the update to the registry to nominate LMGL as the new MEP.</p> <p>LMGL have re-certified these legacy ICPs that they took over in 2016. LMGL emailed the retailer mentioned above to process a MEP nomination across to LMGL from CTCT so that LMGL can update the registry with the appropriate certification details (Meter Installation Certification Form and ICP list can be provided where required).</p> <p>Issue 2: 7 Expired statistical certification –2 x assets have been sold to TRUS, 3 x are going to be added to the current stat sample programme 1 x SMC meter installed on site on the 23/06/2017 – registry still to be updated and 1 x Prepay installation where a new job to be re-issued once the customer fixed the wiring on site</p> <p>Issue 3: 6 installations have expired full certification - 1 x Resolved and registry updated, 3 x installations have been included in our current statistical sampling program, 1 x SMC meter installed on site on the 23/06/2017 – registry still to be updated and 1 x Prepay installation where a new job to be re-issued once the customer fixed the wiring on site.</p> <p>Issue 4: 66 x unmetered – Streetlight supply</p>	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT has controls in place to monitor and maintain the certification of its assets and has the relevant programs in place to maintain the certification going forward. The main issue for our certification problems relates to assets where we are no longer the equipment owner and have contracted the certification to another MEP.	Ongoing	

Timekeeping Requirements			
Non-compliance	Description		
<p>Audit Ref: 7.10</p> <p>With: Clause 23 of Schedule 10.7</p> <p>From: 07-Aug-18</p> <p>To: 31-Aug-18</p>	<p>16 ICPs with time switches not checked within 12 months.</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 because Contact has processes to ensure time switches are checked every 12 months.</p> <p>The impact is low as the trader is not using the timed registers for submission, therefore the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status

CTCT has explained to the trader many times that regardless of their intentions to displace CTCT's asset we are still have a requirement to inspect any site where our meters are still installed. CTCT is planning to visit these installations next year to comply with this part of the code	31/08/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT will discuss the issue further with the trader to gain access to these installations and in case of refusal CTCT will raise a complaint to the EA	Ongoing	

Interim Certification			
Non-compliance	Description		
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Sep-17 To: 31-Jul-18	5,313 ICPs with expired interim certification. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	I have recorded the controls as moderate in this area because certification has been expired for a number of years for these ICPs. 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.		
Actions taken to resolve the issue		Completion date	Remedial action status
As stated in point 7.1. the Certification and Maintenance (Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7)		Completed	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As stated in point 7.1. the Certification and Maintenance (Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7)		Ongoing	