

Compliance plan for FCLM - 2017

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Dec-16 To: 31-Aug-17	Registry not always updated as soon as practicable in some cases Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are recorded as moderate because there is room to improve the timeliness of registry updates. The impact on other participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
New MDMS implemented 01/04/2017. Working with ATH and IT systems to ensure integrity of data is retained and updated within timeframes.		30/04/2018
Preventative actions taken to ensure no further issues will occur		Completion date
New MDMS transition period caused delay in updating registry information. New system upgrades will include management of work issued to ATH, which will include monitoring of delays.		30/04/2018
		Identified

Registry Notification of Metering Records	
Non-compliance	Description
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Dec-16 To: 31-Aug-17	39 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	Remedial action status
Although all efforts are being made the exceptions are due to late nomination by the retailer, as identified, or issues that have arisen through the installation process of the metering equipment on the site outside of ATH or MEP control.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue dialogue between ATH, Retailers, site contacts and relevant parties to minimise these exceptions.	Ongoing	

Metering Installation Design & Accuracy		
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: 31-Aug-17</p>	<p>Error and uncertainty calculations not always conducted correctly by ATHs.</p> <p>ATHs are not always recording the design report reference, 11 x VEMS</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 to improve the records provided by ATHs and their processes.</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
Issue identified and being discussed on improvements by the ATHs non-compliant.	30/04/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing discussions will confirm and expect to resolve non-compliance ATHs.	30/04/2018	

Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Dec-16 To: 31-Aug-17	Some records updated on the registry later than 10 business days. 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	I have recorded the controls as moderate in this area. 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.	
Actions taken to resolve the issue		Completion date
Bulk registry updates on implementation on new MDMS has brought these into report.		30/04/2018
Preventative actions taken to ensure no further issues will occur		Completion date
New MDMS identifies these with further enhancements in progress.		30/04/2018
		Identified

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Dec-16 To: 31-Aug-17	Metering records not populated on registry for 49 ICPs Some CT information is missing. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate because there is room for improvement. There is a minor impact on other participants; therefore the audit risk rating is low.	

Actions taken to resolve the issue	Completion date	Remedial action status
Reporting functions in our new MDMS allows us to capture the missing information. In the process of collecting and updating missing information.	30/04/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
New MDMS functionality enables us to populate going forward.	01/04/2017	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: Clause 1(1) of Schedule 11.4 From: 01-Dec-16 To: 31-Aug-17	8 late MN files Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as strong because FCLM has good monitoring in place for this. The late ones were mainly during the transition to the new system. There is a minor impact on other participants; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
New MDMS implemented. Transition issues identified.	01/04/2017	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
New MDMS implemented. Transition issues identified.	01/04/2017	

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-16 To: 31-Aug-17	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	I have recorded the controls as strong in this area. There are still a small number of areas where improvement can be made. Certification date accuracy is a good example. 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.		
Actions taken to resolve the issue		Completion date	Remedial action status
New MDMS identifies these with further enhancements in progress. Dialogue required for retailer profile.		30/04/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Updated where necessary and ongoing.		30/04/2017	

Cancellation of Certification	
Non-compliance	Description
Audit Ref: 6.4 With: Clause 6 of Schedule 11.4 From: 01-Dec-16 To: 31-Aug-17	Certification cancelled and registry not updated for incorrect monitoring of 9 installations certified at a lower category Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Weak Breach risk rating: 6
Audit risk rating	Rationale for audit risk rating

Medium	I have recorded the controls as weak in this area as the monitoring is done incorrectly. The issues found can all potentially have a moderate impact on other participants and on settlement. The audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
These were purchased from another participant. Once we had been made aware monitoring was required this was done but not on a rolling 12 month period. A technical non-compliance as we do have the data but did not monitor a rolling period. Changes to our management of this has been implemented. Two installations affected have pending work orders for recertification.		27/10/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Changes to our management of this has been implemented.		27/10/2017	

Certification and Maintenance			
Non-compliance		Description	
Audit Ref: 7.1 With: Clause 10.38 (a), clause 1 and clause 15 of Schedule 10.7 From: 01-Dec-16 To: 31-Aug-17		Certification expired for 3,227 ICPs 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 some ICPs and because some of the expired installations were fully certified at one point. 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
FCLM working with participants, mainly TLC, for rectifying customer safety issues on their electrical installation. These have all been visited, some multiple times, and continues to be a work in progress. Number of ICPs with FCLM legacy metering on deployment by other MEP, preventing FCLM completing compliance work.		Ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Ongoing discussion with participants on resolution for each ICP. Some UTIs will be unable to be completed for various HS&E and outside MEP scope of obligation and requirements.	Ongoing	

Certification as a Lower Category		
Non-compliance	Description	
<p>Audit Ref: 7.6</p> <p>With: 6(1)(b) and (d), and 6(2)(b) of Schedule 10.7</p> <p>From: 01-Dec-16</p> <p>To: 31-Aug-17</p>	<p>Incorrect monitoring of 9 installations certified at a lower category</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 as the monitoring is done incorrectly.</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
Same as 6.4. These were purchased from another participant. Once we had been made aware monitoring was required this was done but not on a rolling 12 month period. A technical non-compliance as we do have the data but did not monitor a rolling period. Changes to our management of this has been implemented. Two installations affected have pending work orders for recertification.		27/10/2017
Preventative actions taken to ensure no further issues will occur		Completion date
Same as 6.4. Changes to our management of this has been implemented.		27/10/2017

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Dec-16 To: 31-Aug-17	1,648 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
Same as 7.1. FCLM working with participants, mainly TLC, for rectifying customer safety issues on their electrical installation. These have all been visited, some multiple times, and continues to be a work in progress. Number of ICPs with FCLM legacy metering on deployment by other MEP, preventing FCLM completing compliance work.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Same as 7.1. Ongoing discussion with participants on resolution for each ICP. Some UTIs will be unable to be completed for various HS&E and outside MEP scope of obligation and requirements.		Ongoing
Remedial action status		
Identified		

Electronic Interrogation of Metering Installations	
Non-compliance	Description
Audit Ref: 10.5 With: Clause 8 of Schedule 10.6 From: 01-Dec-16 To: 31-Aug-17	Reporting not available to confirm interrogation within the maximum interrogation cycle Potential impact: High Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4

Audit risk rating	Rationale for audit risk rating		
Medium	<p>I have recorded the controls as moderate in this area because processes are in place but reporting was not provided.</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	Remedial action status
New MDMS improvements to capture and update as required. We also believe consultation should be made on this topic as there are implications and rules needing to be made, currently based on EA Memos.		30/04/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New MDMS improvements to capture and update as required.		30/04/2018	