

Compliance plan for Northpower (MEP)

Non-compliance	Description		
Audit Ref: 2.1 With: 11.2 and 10.6 From: 01-Nov-16 To: 26-Jun-17	Information in registry are missing for VTs and CTs. Date of expired metering certification is not updated. Potential impact: Low Actual impact: Low Audit history: Three time previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Majority of information which are inaccurate in registry are related to low category metering installations. Northpower has on-going project to clean data in the registry		
Actions taken to resolve the issue		Completion date	Remedial action status
Northpower is investigating and correcting any data errors in the Registry as time and staff resources permit. A new staff member is commencing employment late August which, once she is trained, will give additional resource to clean up the CT and VT Registry data.		31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once all data is in Gentrack (currently not all VT data is held in Gentrack) comparison between the Registry and Gentrack can be made to identify missing or error data.		31/12/2017	

Non-compliance	Description		
<p>Audit Ref: 4.10</p> <p>With: 3 Schedule 11.4</p> <p>From: 01-Nov-16</p> <p>To: 26-Jun-17</p>	<p>34% updates entries in registry are uploaded later than 10BD</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three time previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Network billing, customer, switching, chain reaction		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>No action is being taken to change the way the Gentrack software operates when meter data is processed for meters owned by other asset owners. This is the cause of the majority of the Registry reversals and is necessary due to a design flaw with the Registry that does not allow a new MEP to overwrite existing meter data.</p> <p>Eventually this issue will cease to have any impact as Northpower owned meter assets will largely be replaced by advanced meters owned by AMS or Metrix.</p>			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>No action is being taken. Northpower will continue to reverse entries sent to the Registry by Gentrack in those cases where the meter assets are not owned by Northpower or the entry adds no value to the Registry.</p>			

Non-compliance	Description		
<p>Audit Ref: 6.2</p> <p>With: 7(1) of Schedule 11.4</p> <p>From: 01-Nov-16</p> <p>To: 26-Jun-17</p>	<p>For ICP 0000100001NR87B no CTs information and for 10 ICPs no VTs information uploaded into the registry</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three time previously</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	Low audit rating is assigned based on the fact that missing VTs information for 10 ICPs, incorrect information for 1 ICP and missing CTs information for 1 ICP does not have an impact on the market settlement outcome		
Actions taken to resolve the issue		Completion date	Remedial action status
Northpower is investigating and correcting any data errors in the Registry as time and staff resources permit. A new staff member is commencing employment late August which, once she is trained, will give additional resource to clean up this area of Registry data		31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once all data is in Gentrack (currently not all VT data is held in Gentrack) comparison between the Registry and Gentrack can be made to identify missing or error data.		31/12/2017	

Non-compliance	Description		
<p>Audit Ref: 6.3</p> <p>With: 6 of Schedule 11.4</p> <p>From: 01-Nov-16</p> <p>To: 26-Jun-17</p>	<p>No correction of error conducted according to process specified by clause 6 of Schedule 11.4</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three time previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Northpower does not follow a timeline of correcting errors in the registry as this clause requires but a lot of works is done during each month to monitor the correctness of registry records discovered by their own analysis or in conjunction with traders. Identified errors are corrected straight away.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A new staff member is commencing employment late August which, once she is trained, will give additional resource to help with regular reconciliation of Registry data.		31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Priority will be given to identifying missing Registry data (e.g. VT information) and populating the Registry. Reconciliation between the Registry and Gentrack will target areas where the most gain can be made as opposed to investigating data differences where other MEPs are slow to update the Registry.		31/12/2017	

Non-compliance	Description		
<p>Audit Ref: 6.4</p> <p>With: 20(2) of Schedule 10.7</p> <p>From: 01-Nov-16</p> <p>To: 26-Jun-17</p>	<p>10 installations did not have inspections; registry records of expired certification date were not updated.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Low	We assign low audit risk because small number of installation is affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Northpower will implement a process to manage those category 3 and above ICPs for which Northpower is the MEP. A report (spreadsheet) will be provided to AccuCal annually of the ICPs. AccuCal can assess which ICPs require inspection or re-certification and schedule this into their work program.</p> <p>Northpower staff will regularly follow-up with AccuCal to ensure the scheduled inspections or re-certification work is completed and supporting documentation is supplied to Northpower.</p>		31/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		31/3/2018	

Non-compliance	Description		
<p>Audit Ref: 6.5</p> <p>With: 11.8A</p> <p>From: 01-Nov-16</p> <p>To: 26-Jun-17</p>	<p>Not all metering records loaded to the registry as per Table 1 of Schedule 11.4</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: three times previously</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	A very small number of ICPs for which ICP information is not recorded in the registry. Information is not available but Gentrack is not designed to hold them. No impact on market settlement outcome		
Actions taken to resolve the issue		Completion date	Remedial action status
Northpower is investigating and correcting any data errors in the Registry as time and staff resources permit. A new staff member is commencing employment late August which, once she is trained, will give additional resource to clean up this area of Registry data.		31/12/2017	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once all data is in Gentrack (currently not all VT data is held in Gentrack) comparison between the Registry and Gentrack can be made to identify missing or error data.		31/12/2017	

Non-compliance	Description		
<p>Audit Ref: 7.1 With: 10.38(a)</p> <p>From: 01-Nov-16 To: 26-Jun-17</p>	<p>Certification expired for 706 installations, 697 installations category 1 and 9 higher categories</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: twice previously</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The number of non-certified installations doubled since last year up to 706. Northpowers plan is to wait for traders to replace their legacy meters with smart meters. Concern is that even non- certified installations identified in the last audit are still not certified. There are almost all installations category 1</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Category 3 HV, 4 & 5 ICP's are assigned to an external Class A Test House for recertification. In cases where the HV CT's and VT's need to be recertified, the job has to be coordinated with a shutdown arranged by the customer. A new process to manage this outlined in other sections of this report will be implemented.</p> <p>Metering at BTS's is now certified for 12 months on the basis that a BTS must be replaced by a permanent supply within 12 months. Delays in customers completing their building projects can result in the certification expiring. A new process, similar to that being introduced for category 3 HV, 4, & 5 ICPs will be introduced for the BTS ICPs so that Northpower Contracting can program this work into their schedule.</p> <p>Uncertified and expired certification category 1 ICPs will be the subject of the arrangement with traders outlined above. Those ICPs with a trader who is not undertaking an advanced meter roll-out project will be dealt with by Northpower.</p>		31/3/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A more formal process for reviewing the meter certification tasks passed to Northpower Contracting or the external Class A Test House will be introduced.</p>		31/3/2018	

Non-compliance	Description	
<p>Audit Ref: 8.2</p> <p>With: 46(1) of Schedule 10.7</p> <p>From: 01-Nov-16</p> <p>To: 26-Jun-17</p>	<p>No inspection conducted for 1 ICP category 5 and 9 installations category 3</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	We assess the audit risk rating as low because the level of non-compliance is not improving and installation category 3 and 5 are of concern but small number of installations are affected	
Actions taken to resolve the issue		Completion date
<p>Northpower will implement a process to manage those category 3 and above ICPs for which Northpower is the MEP. A report (spreadsheet) will be provided to AccuCal annually of the ICPs. AccuCal can assess which ICPs require inspection or re-certification and schedule this into their work program.</p> <p>Northpower staff will regularly follow-up with AccuCal to ensure the scheduled inspections or re-certification work is completed and supporting documentation is supplied to Northpower.</p>		31/3/2018
Preventative actions taken to ensure no further issues will occur		Completion date
As above.		31/3/2018
		Identified