

Compliance Plan for Influx Energy Data Ltd MEP – 2024

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Jan-23 To: 22-Dec-23	Some certification records not complete and accurate. Registry not always updated as soon as practicable. Potential impact: Medium 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 because there is room for improvement. 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
Incorrect records identified in the Audit updated	01/04/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per Participant Response	Ongoing	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Jan-23 To: 22-Dec-23	Some 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 Influx is often prevented from updating the registry due to late nomination by traders, late field notification or other participant's registry events preventing updates. 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
Check discrepancy reporting to identify MEP related issues.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per Participant Response	Ongoing	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Jan-23 To: 22-Dec-23	Some records updated on the registry later than ten 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 because they reduce risk most of the time but there is still room for improvement, especially with new connection updates. 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	Remedial action status
Check discrepancy reporting to identify MEP related issues.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As per Participants Response	Ongoing	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Jan-23 To: 22-Dec-23	Some inaccurate or incomplete certification records. Potential impact: Medium 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 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
Identified records updated	01/05/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Regular meetings scheduled with ATHs Checks on returned certs.	Ongoing	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Jan-23 To: 22-Dec-23	78 late MN files. Potential impact: Low Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. There was no impact; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Files were accepted	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Review acceptance procedure.	01/10/2024	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Jan-23 To: 22-Dec-23	Some registry records are 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 as the number of discrepancies is low and continues to decrease. 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
Look to carry out data quality scrubbing as we look to migrate data and consolidate MEP Codes	01/10/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Control current and new data collected and submitted	01/10/2024	

Cancellation of Certification		
Non-compliance	Description	
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 01-Jan-23 To: 05-Mar-24	Certification cancelled and registry not updated for: <ul style="list-style-type: none"> • one installation not fit for purpose due to low burden, • two installations without inspections conducted by the due date, • 22 installations with sum-check failures not remediated within three business days, and • three metering installations with invalid statistical sampling certification. 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 as Influx is aware of its responsibility to cancel certification and has good processes to identify issues requiring cancellation. The responsibility for the MEP is to cancel certification on the registry once they know certification is cancelled and the impact of not doing this is minor and there are a low number of ICPs which were not cancelled in the required timeframe, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Raise SR to automate check-sum failure process.	20/03/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Automation of sum check process.	30/04/2024	

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-Jan-23 To: 05-Mar-24	Certification cancelled or expired for 19,011 ICPs. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Strong Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
High	I have recorded the controls as strong in this area as Influx has demonstrated that it is making good progress on its plans to recertify the remaining uncertified metering installations. The impact on settlement is recorded as high because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Plan formulated and being actioned.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue with compliance plan which includes Statistical Sampling and Displacement	Ongoing	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 01-Jan-23 To: 22-Dec-23	All test results not recorded in a sample of 49 certification records completed by the Influx ATH. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because sufficient testing is conducted to ensure the installation is accurate. The impact is low as the accuracy of the metering installation has been confirmed by the testing completed, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Discussions with ATHs	01/12/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As per Participant Response	Ongoing	

Alternative Certification Requirements		
Non-compliance	Description	
Audit Ref: 7.9 With: Clauses 32(2), (3) and (4) of Schedule 10.7 From: 18-Jul-23 To: 17-Aug-23	Notification of alternative certification not provided to the Authority within ten business days for three metering installations. 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 in this area because Influx provides the information as soon as it is available. There is no impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Organised regular meetings with ATH	01/11/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Regular meetings scheduled with ATH who had a resource problem.	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Jan-23 To: 05-Mar-24	83 meters with time dependent registers were not monitored every 12 months. 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 as FCLM has implemented a process to identify meters affected and ensure the time dependent registers are not used for submission. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Reporting in place to identify meters. Registry updated to ensure no reconciliation issues.	01/01/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Influx will be looking at further options on completion of modem upgrade project that will cover all scenarios.	Ongoing	

Compensation Factors		
Non-compliance	Description	
Audit Ref: 7.14 With: Clause 24(3) of Schedule 10.7 From: 11-Aug-23 To: 14-Feb-24	Compensation factor incorrectly recorded on the registry for one FCLM category 1 metering installation. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as the process for identifying incorrect compensation factors did not identify the discrepancy. The impact on settlement and participants could be minor as only one category 1 metering installation was impacted; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Error updated	14/02/2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Error Updated	14/02/204	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 23-Dec-23	190 FCLM ICPs with expired interim certification. One TRUM ICP with expired interim certification. 15,960 LMGL ICPs where most have expired interim certification. Potential impact: High Actual impact: Medium Audit history: Multiple times Controls: Strong Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
High	I have recorded the controls as strong in this area as Influx has demonstrated that it is making good progress on its plans to recertify the remaining uncertified metering installations. The impact on settlement is recorded as high because of the increased likelihood of failure or inaccuracy for metering installations with expired certification, therefore the audit risk rating is high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Double up on 7.1 Interim Certification no longer exists and these ICPs are already covered in non-compliance of clause 7.1	Ongoing	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Clause 7.19 is no longer relevant as Interim certification no longer exists.	Ongoing	

Category 2 to 5 Inspections			
Non-compliance	Description		
Audit Ref: 8.2 With: Clause 46(1) of Schedule 10.7 From: 04-Jul-23 To: 05-Mar-24	Inspections not conducted within the required timeframe for two category 3 FCLM metering installations. 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	The controls are recorded as strong because Influx has a robust process for monitoring inspection periods for metering installations and the majority of inspections are completed as required. The impact on settlement and participants could be minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Sites were recertified		08/03/2024	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Regular meetings with ATH who had a resource issue.		Ongoing	

Meter bridging		
Non-compliance	Description	
Audit Ref: 9.5 With: Clause 10.33C From: 07-Aug-23 To: 08-Aug-23	One FCLM category 1 meter not reinstated after bridging within five business days of notification. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because Influx has robust processes for issuing work orders for reinstatement after bridging. The impact on settlement and participants is minor as only one ICP was affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
The time frame of 5 days is unrealistic with resources in some areas stretched due to covid etc.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We make every endeavour to meet the deadline but not always possible when dealing with other participants.	Ongoing	

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 01-Jan-23 To: 05-Mar-24	Clock errors greater than the threshold for two ICPs. Potential impact: Low Actual impact: None Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations. The errors were all small and none were across a trading period, therefore there is no impact on participants or settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Time adjusted when identified as outside tolerances.	At the time	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Time adjusted when identified as outside tolerances.	At the time	