

## Compliance plan for Counties MEP 2024

MEP responsibility for services access interface			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 10.9(2)</p> <p>From: 01-Jan-23</p> <p>To: 04-May-24</p>	<p>Each services access interface is not identified for 27 metering installations.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>I have recorded the controls as strong because the services access interface is still maintained in a compliant manner despite the incorrect recording in certification reports.</p> <p>There is no impact because the MEP normally determines the location of the services access interface; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Confirming with the transition to operations under Ihub ATH in June, A new metering certification report has been implemented and this does now include all required / redundant statements concerning service access interfaces.</p>		20/06/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The service access interface seems to serve a purpose only as a legal point of demarcation of responsibilities between participants in the code. These responsibilities, and who will provide the data is well understood by all participants via the contracts in place, and the need to include this superfluous information in certification reports appears unnecessary.</p>		20/06/2024	

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: 04-May-24	Some information is incorrect, as recorded in <b>sections 5.1, 6.2 and 6.4</b> . Potential impact: Medium Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are recorded as moderate because there is room to improve processes. 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
We will run the registry report AC020 at minimum quarterly and address any registry information anomalies this reporting raises.	August 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
In most cases timeliness of registry updates significantly exceeds the allowable timeframes, and we will continue to strive towards continuous improvement here. The other participants ATH and Retailers do also impact this outcome.		

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-May-23 To: 08-Apr-24	24 registry updates later than 15 business days. Potential impact: Medium Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are in place to ensure the timeliness of updates, but Counties are often prevented from updating the registry due to not being nominated at the time of the metering installation. 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
In most cases timeliness of registry updates completed significantly exceeds the allowable timeframes, and we will continue to strive towards continuous improvement here. The other participants ATH and Retailers do also impact this outcome.	26/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Late ATH paperwork and or MEP nominations will be followed up with the relevant party as these arise.	26/06/2024	

Design Reports for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 4.1 With: 2 of Schedule 10.7</p> <p>From: 01-Jan-22 To: 17-Feb-23</p>	<p>Maximum interrogation cycle for each services access interface not recorded in design reports.</p> <p>Design report not recorded for one installation certified by VCOM.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Strong controls are in place because Counties are preparing to use compliant design reports from June 2024.</p> <p>There is little impact because the installations are compliant despite the incorrect design reports.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Intellihub ATH ,metering design reports have been adopted, these incorporate the required service access interface statements etc.	30/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Reminder of requirement to record the design report reference number sent to field staff and report checkers.</p> <p>Note regards the interrogation cycle, this information now appears to be superfluous with respect to other provisions and requirements within the code. Suggest review of the code with respect to this.</p>	30/06/2024	

Changes to Registry Records		
Non-compliance	Description	
<p>Audit Ref: 4.10</p> <p>With: Clause 3 of Schedule 11.4</p> <p>From: 01-May-23</p> <p>To: 08-Apr-24</p>	<p>Some records updated on the registry later than ten business days.</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	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there is room to improve and shorten the notification process for updates.</p> <p>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.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Noted, on review it has been difficult to reconcile why the registry update stats have dropped recently. Typically, Cat 1 metering records are updated swiftly; any subsequent file update can make this appear late. Other technical issues with systems and file transfers can delay registry updates requiring limited IT resource to resolve.</p> <p>Noting also sometimes there is insufficient contractor resource in the ATH space especially for high category ICP certification, hence ATHs cannot always provide the desired level of service to allow a 10 day registry update for the higher category ICPs.</p>		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will look to improvements in systems reliability with planned Dynamics 365 systems updates in October. We will also look towards undertaking category 2 metering installation certification with our own in-house field staff within the next 12 months.	October 2024	

Accurate and Complete Records		
Non-compliance	Description	
<p>Audit Ref: 5.1</p> <p>With: Clause 4(1) of Schedule 10.6</p> <p>From: 01-Jan-23</p> <p>To: 08-Apr-24</p>	<p>Some inaccurate certification records.</p> <p>Wells certification reports do not clearly record the error and uncertainty for category 2 comparative certification.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have recorded the controls as moderate because there is room for improvement.</p> <p>There is a minor impact on other participants; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The format of certification reports is the prerogative of the ATH. Counties Energy has fulfilled its obligations by utilising registered Test Houses listed as Approved by the Electricity Authority and also holding current ISO 9001 and or ISO 17025 quality certification.</p> <p>These organisations must have passed the corresponding audit and certification processes associated with above, the intention of which is to ensure that the formal certification documentation issued by these certification bodies can be relied on to be true and correct.</p> <p>Responsibility needs to sit in the appropriate place. We do not believe it is the intention of code that the above responsibilities should all under MEP role, nor should require the level of technical expertise and understanding to scrutinise certification documentation in such minute detail, as is the Approved Test House responsibility.</p>		Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>However, we have raised the matters with the contracted ATHs we rely on, noting however they are independent companies and there is little to no alternative providers of these services.</p> <p>More resource and competition is desperately needed in the ATH space, and care needs to be taken to ensure participation in this industry is encouraged in the same way new Traders are supported when they don't know the rules / and are not discouraged.</p>		
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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-May-23</p> <p>To: 08-Apr-24</p>	<p>Some registry records are 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	
<b>Low</b>	<p>I have recorded the controls as moderate in this area because there are still a small number of areas where improvement can be made.</p> <p>Very few of the discrepancies have an impact on participants, customers or settlement. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We are aware of minor errors in some registry data sets, however sometimes the actual process to correct these can be complex by the virtue of the way the registry works and how our IT systems interfaces with it.</p>		Investigating
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	
<p>The company is implementing a new version of our ERP system we hope will allow easier Registry updates from the general user level</p>	October 2024	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 20 of Schedule 10.7</p> <p>From: 01-May-23</p> <p>To: 05-May-24</p>	<p>Certification not cancelled within ten business days on the registry for:</p> <ul style="list-style-type: none"> <li>• two metering installation where the inspections were not completed,</li> <li>• one metering installation certified for insufficient load where monitoring was not conducted between January and May 2024,</li> <li>• seven metering installations not read within the maximum interrogation cycle where the AMI flag is still Y, and</li> <li>• three ICP with failed sum-check, which have now been recertified.</li> </ul> <p>Potential impact: Low</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	
<b>Low</b>	<p>I have recorded the controls as moderate as there is room for improvement.</p> <p>The responsibility for Counties is to cancel certification on the registry once they know certification is cancelled and the impact of not doing this is minor, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Noting The two ICPs with missed inspections were fully recertified in leu of the scheduled inspection.</p> <p>Insufficient load ICP monitoring is now in place on the ICP in question, but load is still insufficient for full certification. In this scenario it is unclear to us what benefit cancelling the insufficient load certification now achieves when we are actually struggling to get ATH resource for other compliance work at high category ICPs.]</p>	26/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Sum check: This is a semi manual process involving receiving emails and validating that the sumcheck issue is real and uploading the required registry update.</p> <p>Blanket cancellation of the metering device certification assumes fault with the meter, when it can fail sumcheck due to some missing HHR intervals in the data collection, which is due to temporary communications difficulties. There can be no fault with the meter. Counties strongly believes this is inconveniencing our customers unnecessarily with unnecessary meter changes and this rule needs some review.</p>		



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: 01-Jan-23</p> <p>To: 05-May-24</p>	<p>Certification expired for:</p> <ul style="list-style-type: none"> <li>- 250 previously interim certified category 1 ICPs,</li> <li>- 94 category 1 ICPs,</li> </ul> <p>Certification cancelled for 24 metering installations.</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		
<b>Medium</b>	<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>We continue to work to resolve these uncertified ICPs, noting it appears Counties Energy has the smallest outstanding list in the industry.</p> <p>The miscellaneous difficulties involved with certifying residential metering does not appear to be well appreciated or understood within the regulations.</p> <p>If Traders were not allowed to bill on uncertified metering installations, it would provide some financial incentive for them to actively assist the MEP with these matters, or electrical disconnection of such ICPs was mandated then these would be resolved.</p> <p>It recently appears through eagerness of the rules within the code to require cancelation metering certification for simple administrative oversights that the purpose of certification has also perhaps lost its technical significance.</p>		Unknown	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	

<p>A downward trend in total uncertified meter/ICP population is still clearly evident from month to month. ICPs with outstanding recertification work all sit with associated Traders to follow up with their customers on miscellaneous matters.</p> <p>All Trader service requests for recertification are actioned promptly when the notified prerequisite issues preventing metering recertification has been addressed by the Trader and or customer.</p> <p>By the way the code now works with all the requirements to cancel certifications, it is possible there may always be a small % of ICPs with a status of cancelled certification.</p>	Unknown	
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Insufficient Load for Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.7</p> <p>With: Clauses 14(3) and (4) of Schedule 10.7</p> <p>From: 18-Dec-23</p> <p>To: 05-Jun-24</p>	<p>ICP 1099584667CNB0F certified for insufficient load not monitored between 18 December 2023 to 5 June 2024.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>There is no evidence the installation is recording incorrectly; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The load monitoring and automatic notification function is now configured in Clariti.</p> <p>Noting whilst the automated monitoring was not set up - for most of the period we knew the factory was in fact not in operation, and in fact it is still not operating at this time.</p>	5/06/2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Monitoring should and will be set up at the same time as loading the low load certification information to the system and Registry and this instance was an administrative oversight.</p>	5/06/2024	

Metering Installations Incorporating a Meter		
Non-compliance	Description	
Audit Ref: 7.15 With: Clause 26(1) of Schedule 10.7  From: 01-May-23 To: 05-Jun-24	18 metering installation certification reports without meter certification details recorded.  Potential impact: Low  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  There is no evidence the meters are not recording correctly; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Specification of the meter certification date was a deficiency in the old field computing application, and significant work has now been completed to ensure this is input and reported on the certification document.	20/06/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The meter certification date details fields are now available are now mandatory fields for input and reporting.	20/06/2024	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of Schedule 10.7 From: 01-Apr-15 To: 05-May-24	250 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	
<b>Medium</b>	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
All ICPs with expired certification are mainly due to technical and predominantly electrical safety matters. All have been escalated to the Retailers / customers associated. These are being addressed on a case-by-case basis by the Retailer concerned and service orders are issued to Counties Energy as appropriate when the site is ready for new metering.		Undefined
Preventative actions taken to ensure no further issues will occur		Completion date
We cannot allow these metering compliance requirements to override health and safety and WorkSafe regulations. When customers have undertaken the necessary repairs, we promptly undertake the metering work. Counties Energy now disputes that we have not undertaken our responsibilities under the code in relation to the matter.		Undefined
		Disputed

Category 2 to 5 Inspections		
Non-compliance	Description	
<p>Audit Ref: 8.2</p> <p>With: Clause 46(1) of Schedule 10.7</p> <p>From: 27-Nov-23</p> <p>To: 05-May-24</p>	<p>Inspections not conducted for two category 5 metering installations.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>There is no impact on settlement because both installations have been recertified; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The 2 x cat 5 ICPs with missed inspections have been fully recertified 14/03/2024.	14/03/2024	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Review systems and job notification period to allow additional time for the ATH to adequately coordinate this work within their work schedule.	21/06/2024	

Electronic Interrogation of Metering Installations			
Non-compliance	Description		
<p>Audit Ref: 10.5</p> <p>With: Clause 8 of Schedule 10.6</p> <p>From: 01-Mar-23</p> <p>To: 31-May-24</p>	<p>Seven ICPs not read within the maximum interrogation cycle, where the AMI flag was still "Y".</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>In some cases, we fully know why the data isn't being delivered, know it is a temporary situation perhaps the connection status, have advised the Trader, so the concerned party is aware and perhaps they do not wish to set up a manual read for a temporary period. The data is within the meters technical interrogation cycle which is typically not exceeded but only the new 30 day read data collection requirement.</p>		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The process is now bedded in much more effectively. The process of maintaining the AMI flag is currently semi manual requiring running of files etc. The rules don't cater well for clubs churches, halls, rural situations - irrigation pumps etc where the customers choose to isolate the electricity supply pre meter. We will discuss further with the retailers to encourage different customer behaviour.</p>		N/A	

Time Errors for Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.7</p> <p>With: Clause 8(4) of Schedule 10.6</p> <p>From: 01-Apr-24</p> <p>To: 30-Apr-24</p>	<p>51 examples of clock errors outside the allowable thresholds for April 2024.</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	
<b>Low</b>	<p>I have recorded the controls as strong because clocks are synchronised during every successful interrogation.</p> <p>The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>This is an extremely minor matter. For category 1 meters the time can be out by 30 seconds on first install prior to the initial communication and time synchronization, this is typically not an issue as is corrected promptly on joining the network.</p>	None	Disputed
<p>Preventative actions taken to ensure no further issues will occur</p>	Completion date	
<p>The end-to-end AMI metering technology used is commonplace and meets industry standards, and clock synchronisation processes are in place and active, 51 meters from a meter fleet exceeding 60,000 devices = 0.09% devices outside the threshold. It is unclear what more we can request to be done by our data administrator now with respect to this. Perhaps this just represents the current state of meter technology in service in 2024.</p>	None	



Investigation of AMI interrogation failures		
Non-compliance	Description	
<p>Audit Ref: 10.12</p> <p>With: Clause 8(11), 8(12) and 8(13) of Schedule 10.6</p> <p>From: 01-Mar-23</p> <p>To: 31-May-24</p>	<p>AMI flag not changed to "N" for 11 ICPs where interrogation was not successful within 30 days or 25% of the interrogation cycle.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The new flag update process is being consistently applied now.	July 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
There has been disagreement on the application of this new rule. It is currently being applied to inactive and vacant electrically disconnected ICPs and also applied at ICP level not meter level, meaning the replacement meters on failed communications ICPs are being switched to AMI No when they are working perfectly. We believe this is a misinterpretation of the code and it has been pointed out to our data administrator and we hope to reach mutual agreement on this at our next meeting.	July 2024	