

Compliance plan for Bluecurrent Assets NZ Limited MEP – 2024

Participants to Provide Accurate Information		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6 From: 01-Sep-23 To: 02-May-24	AMCI and NGCM 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	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
Bluecurrent is in the process of correcting all identified inaccuracies	30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review its processes and training to identify any opportunities to improve its performance and strengthen its controls.	Ongoing	

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Sep-23 To: 02-May-24	AMCI and NGCM 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 Bluecurrent is often prevented from updating the registry due to late and inaccurate provision of information by ATHs. 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
Timeliness issues that have already occurred are unable to be resolved	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review its processes to determine what improvements can be made and communicate with other participants to remind them of their responsibilities	Ongoing	

Changes to Registry Records		
Non-compliance	Description	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Sep-23 To: 02-May-24	NGCM and AMCI Some records updated to the registry later than ten business days. 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 in this area because there is room for improvement. Late updates for new connections can have a minor impact on participants and settlement, therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Timeliness issues that have already occurred are unable to be resolved	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion, and strengthen its controls.	Ongoing	

Accurate and Complete Records		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 4(1) of Schedule 10.6 From: 01-Sep-23 To: 02-May-24	NGCM and AMCI Some inaccurate 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 instruction has been provided to ATHs, but there is further work to be done. 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
The identified issues will be reviewed and corrected where required.	30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review this area and further reinforce with its ATHs this requirement and determine how this can be monitored and, where issues are identified, raised with its ATHs promptly	Ongoing	

MEP Response to Switch Notification		
Non-compliance	Description	
Audit Ref: 6.1 With: 1(1) of Schedule 11.4 From: 01-Sep-23 To: 02-May-24	AMCI 14 late MN files. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong as the processes to identify and accept identify nominations are robust. The impact is low; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Timeliness issues that have already occurred are unable to be resolved	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to monitor systems that run required processes to ensure issues are identified in a timely manner	Ongoing	

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-Sep-23</p> <p>To: 02-May-24</p>	<p>NGCM and AMCI</p> <p>Some registry records were 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		
Low	<p>I have recorded the controls as moderate in this area. There are still a small number of areas where improvements can be made.</p> <p>Some of the discrepancies have a moderate impact on participants, customers or settlement. The relevant ones in this regard are tariff related. The audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
All identified accuracy issues are in the process of being corrected. Timeliness issues that have already occurred are unable to be resolved		30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Bluecurrent will continue to review processes to ensure data is complete and accurate and implement a process to monitor and resolve issues are identified and amended in a timely fashion, and strengthen its controls.		Ongoing	

Correction of Errors in Registry		
Non-compliance	Description	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4 From: 01-Sep-23 To: 02-May-24	NGCM and AMCI Discrepancies not resolved within five business days. 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 in this area. There are still a small number of areas where improvements can be made. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
All identified accuracy issues are in the process of being corrected.	30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to look at its process to identify any opportunities to improve its performance and strengthen its controls.	Ongoing	

Cancellation of Certification		
Non-compliance	Description	
<p>Audit Ref: 6.4</p> <p>With: Clause 6 of Schedule 11.4</p> <p>From: 01-Sep-23</p> <p>To: 02-May-24</p>	<p>Certification cancelled, and registry not updated within ten business days for:</p> <p>NGCM</p> <ul style="list-style-type: none"> • four bridged meters, and • 201 category 2 installations with inspection not conducted, <p>AMCI</p> <ul style="list-style-type: none"> • a sample of 45 from 184 installations with inspection not conducted, and • one installation not monitored after certification with insufficient load conducted. <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 in this area as there is room for improvement.</p> <p>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, therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
All identified instances are in the process of being corrected on the Registry	30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review its processes and training to ensure certifications are cancelled on the Registry.	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: 22-Feb-11</p> <p>To: 02-May-24</p>	<p>NGCM</p> <p>Certification expired or cancelled for 21,498 NGCM metering installations.</p> <p>AMCI</p> <p>Certification expired for 617 AMCI 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	
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. The audit risk rating is recorded as medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Bluecurrent continues to maintain established and active programs of work to resolve the expired certification issues. These programs have clear and continual monitoring, and the progress continues to be positive and is tracking in accordance with commitments made. Issues such as technician resourcing, access to properties (e.g. customer refusal, vacancy, or another MEP nominated), and safety (VIR, ACM, gas proximity) continue to be present. Solutions for the installations that are unable to be certified are continually being worked on in conjunction with traders, ATHs, and metering vendors.</p> <p>Of the ~21k NGCM uncertified ICPs around 7k are de-energised installations, many being long-term. Of the remaining ~14k installations, over 10k have detailed UTC reasons.</p>	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
See above		

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b) and clause 9 of Schedule 10.6 From: 01-Sep-23 To: 02-May-24	NGCM Prevailing load test not conducted for category 1 recertification without meter replacement. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the test not conducted is prevailing load using a working standard to recertify an installation with existing components. Other testing confirms the integrity of the installation, and the industry has the view that this test is not required. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Blluecurrent does not believe a prevailing load is required in Certified BTS>Perm situations.	Ongoing	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Where we believe a prevailing load test is required, our policy is to replace meters as the test houses do not have provision of expensive equipment to undertake this testing.	Ongoing	

Insufficient Load for Certification Tests		
Non-compliance	Description	
<p>Audit Ref: 7.7</p> <p>With: Clause 14 (4) of Schedule 10.7</p> <p>From: 20-Dec-23</p> <p>To: 24-May-24</p>	<p>AMCI</p> <p>One installation not monitored after certification with insufficient load conducted.</p> <p>Potential impact: Medium</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	
Low	<p>I have recorded the controls as moderate in this area as the AMCI process normally ensures that monitoring is conducted but there is room for improvement.</p> <p>There was no impact on settlement and participants as it is unlikely that the accuracy of the metering installation will be affected; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
No further action required.	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will review its monitoring processes to identify any opportunities for improvements.	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 01-Sep-23 To: 02-May-24	NGCM 664 ICPs with time dependent meter registers that were not monitored every 12 months. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as NGCM has the capability to identify this, but regular monitoring and correction has not taken place. 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
Bluecurrent will work with other participants to have the metering either remotely monitored and corrected or physically replaced.	31/10/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review how it deals with meters where the installation is non-communicating and there is a time dependent code with a view to ensuring a physical check within each 12 months, where required.	Ongoing	

Compensation Factors		
Non-compliance	Description	
Audit Ref: 7.14 With: 24(3) of Schedule 10.7 From: 23-Dec-23 To: 22-May-24	NGCM Compensation factors were incorrectly recorded on the registry for two NGCM ICPs. Potential impact: High 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 NGCM has processes to identify incorrect compensation factors but there is room for improvement in the time taken to correct the discrepancy in one of the two cases. The impact on settlement is still under investigation and it has not been determined if the incorrect compensation factors were used. I have recorded the impact as low due to the timeframe and differences involved; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
No further action required as corrections have been made	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent will continue to review its processes to identify any opportunities for improvements.	Ongoing	

Interim Certification		
Non-compliance	Description	
Audit Ref: 7.19 With: Clause 18 of schedule 10.7 From: 01-Apr-15 To: 02-May-24	NGCM 14,325 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. The audit risk rating is recorded as medium.	
Actions taken to resolve the issue	Completion date	Remedial action status
Bluecurrent continues to maintain established and active programs of work to resolve the expired certification issues. These programs have clear and continual monitoring, and the progress continues to be positive and is tracking in accordance with commitments made. Issues such as technician resourcing, access to properties (e.g. customer refusal, vacancy, or another MEP nominated), and safety (VIR, ACM, gas proximity) continue to be present. Solutions for the installations that are unable to be certified are continually being worked on in conjunction with traders, ATHs, and metering vendors.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above		

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: 01-Sep-23</p> <p>To: 02-May-24</p>	<p>NGCM</p> <p>201 metering installations with inspection not conducted.</p> <p>AMCI</p> <p>184 metering installations with inspection not conducted.</p> <p>Six NSP metering installations with inspections not conducted.</p> <p>Potential impact: Medium</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 for NGCM because reporting is in place but there is room for improvement. AMCI's inspection controls are rated as moderate because there is a regime in place to identify and manage inspections but not all inspections were able to be completed.</p> <p>The issues found can 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	Remedial action status
All identified instances are in the process of being corrected on the Registry		30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Bluecurrent recognise that there are several issues that contribute to this non-compliance, primarily field resourcing capacity, and is working with its partners to identify opportunities for improvements		Ongoing	

Meter bridging		
Non-compliance	Description	
Audit Ref: 9.5 With: Clause 10.33C From: 01-Sep-23 To: 02-May-24	NGCM Meters not reinstated after bridging within five business days of bridging for 13 from a sample of 18 of 59 bridged category 1 meters. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	I have recorded the controls as moderate as there is room for improvement. The impact on settlement and participants is minor based on the number of ICPs affected; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Bluecurrent will continue to work on resolving the outstanding issues on the installations.	30/09/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This is an example of a Code obligation on a participant where it is often dependent on the actions of another party to achieve full compliance. An MEP requires permission from the trader to access a property and, in-turn, a trader must provide their customer with the advanced notification in their customer contracts. This is commonly at least 10 business days prior to access unless it is for safety reasons, which rectifying a bridged meter would not be. This 10-day period is what the EA expects as noted in its Principles and Minimum Terms and Conditions for Domestic Contracts. Bluecurrent accepts that this mismatch in timeframes will not always be the primary cause in not meeting the obligation.	Ongoing	

Electronic Interrogation of Metering Installations		
Non-compliance	Description	
<p>Audit Ref: 10.5</p> <p>With: Clause 8(2), 8(3), 8(5) and 8(6) of schedule 10.6</p> <p>From: 02-Oct-22</p> <p>To: 12-Jun-24</p>	<p>AMCI</p> <p>Data not collected within the maximum interrogation cycle for four ICPs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because interrogation occurs daily and when interrogation is not successful the trader is notified. In all cases AMCI is awaiting further information or action from traders.</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
Bluecurrent will continue to work with the traders to ensure they are actively working on resolving the issues.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent systems or process are not the cause of this identified non-compliance, and it is fully reliant on other participants.		

Time Errors for Metering Installations		
Non-compliance	Description	
Audit Ref: 10.7 With: Clause 8(4) of schedule 10.6 From: 01-Sep-23 To: 02-May-24	<p>NGCM</p> <p>142 examples of clock errors outside the allowable thresholds in the most recent reports.</p> <p>AMCI</p> <p>Five clock errors outside the thresholds in the most recent reports.</p> <p>Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because interrogation is attempted daily, and clock errors are addressed during all interrogations.</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
NA	NA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Bluecurrent has made good progress in the area and will continue to assess the results of clock checks to identify any opportunities for process or technical improvements.	Ongoing	