

Compliance plan for Wells ATH – 2018

Provision of Accurate Information		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 10.6 of Part 10</p> <p>From: 01-Dec-17</p> <p>To: 17-Nov-18</p>	<p>Maximum interrogation cycle not recorded for 6 of 38 records.</p> <p>Category 2 certification reports do not record error and uncertainty calculations with enough clarity to be able to determine whether the tests have passed or failed.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<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 a moderate impact on MEPs and Traders, because certification is cancelled for 10 of 23 metering installations and the reports did not have sufficient clarity for MEPs to be able to determine this. The MEP is therefore also non-compliant. The audit risk rating is Medium.</p>	
Actions taken to resolve the issue		Completion date
<p>The installation certifications found to have no Maximum Interrogation Cycle entered can have the required value entered by our back office.</p> <p>It is not believed that anything can be done to retrospectively change what was viewable by the technician at the time of certification, because the modifications proposed to address this will not be applied to existing jobs</p>		<p>7-12-18</p> <p>-----</p>
Preventative actions taken to ensure no further issues will occur		Completion date

<p>The instances of this occurring were all on jobs performed under one or other of the two specific workflows, where the field was not setup as a mandatory requirement, as it is in other workflows. This will be changed to ensure that the technician must select a value for this field before the job can be completed.</p>	4-12-18	
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and so a modification to the relevant workflows and subsequent reports will be initiated</p>	28-12-18	

ATH Record Keeping Requirements		
Non-compliance	Description	
<p>Audit Ref: 3.7</p> <p>With: Clause 12(2)(a) of Schedule 10.4</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>Category 2 comparative certification records not sufficiently detailed to enable verification of all aspects of all tests carries out.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The lack of clarity has led to installations being certified with uncertainties higher than those allowed by the Code, leading to cancellation of certification, which affects MEPs and Traders, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
It is not believed that anything can be done to retrospectively change what was viewable by the technician at the time of certification, because the modifications proposed to address this will not be applied to existing jobs		-----
Preventative actions taken to ensure no further issues will occur		Completion date
It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and so a modification to the relevant workflows and subsequent reports will be initiated		28-12-18

Meter Requirements		
Non-compliance	Description	
<p>Audit Ref: 3.11</p> <p>With: Clause 26(4) of Schedule 10.7</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>Maximum interrogation cycle not recorded for 6 metering installations.</p> <p>Potential impact: None</p> <p>Actual impact: None</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak because the checking process does not seem to identify this field being blank.</p> <p>There is no impact on MEPs because they are the source of this information anyway; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The installation certifications found to have no Maximum Interrogation Cycle entered can have the required value entered by our back office.		14-12-18
Preventative actions taken to ensure no further issues will occur		Completion date
The instances of this occurring were all on jobs performed under one or other of the two specific workflows, where the field was not setup as a mandatory requirement, as it is in other workflows. This will be changed to ensure that the technician must select a value for this field before the job can be completed.		4-12-18
		Identified

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
Audit Ref: 3.14 With: Clause 36(3) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18	Maximum interrogation cycle not recorded for 6 metering installations. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because the checking process does not seem to identify this field being blank. There is no impact on MEPs because they are the source of this information anyway, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
The installation certifications found to have no Maximum Interrogation Cycle entered can have the required value entered by our back office.		7-12-18
Preventative actions taken to ensure no further issues will occur		Completion date
The instances of this occurring were all on jobs performed under one or other of the two specific workflows, where the field was not setup as a mandatory requirement, as it is in other workflows. This will be changed to ensure that the technician must select a value for this field before the job can be completed.		4-12-18
		Identified

ATH Must Not Certify Metering Installations under Certain Circumstances			
Non-compliance	Description		
<p>Audit Ref: 5.1</p> <p>With: Clause 8(1) Of Schedule 10.7</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>11 Category 2 metering installations certified with uncertainties greater than 0.6%</p> <p>5 Category 2 metering installations certified with burden lower than 25% of the rated burden.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as moderate because there is room for improvement in order to identify such situations.</p> <p>The impact on settlement could be moderate and the impact on MEPs is moderate because certification is cancelled, leading to non-compliance for the MEP in addition to non-compliance for Wells; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-12-18	

Raw Meter Data Output Test		
Non-compliance	Description	
<p>Audit Ref: 5.15</p> <p>With: Clause 9(2) of Schedule 10.7</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>11 Category 2 metering installations certified with uncertainties greater than 0.6%.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%.</p> <p>Certification is cancelled for these installations which impacts on the compliance of the MEPs, therefore the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----
Preventative actions taken to ensure no further issues will occur		Completion date
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-12-18
		Identified

Test Results		
Non-compliance	Description	
<p>Audit Ref: 5.16</p> <p>With: Clause 10(1) & (2) of Schedule 10.7</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>11 Category 2 metering installations certified with uncertainties greater than 0.6%.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%.</p> <p>Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----
Preventative actions taken to ensure no further issues will occur		Completion date
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-12-18
		Identified

Comparative Recertification Tests		
Non-compliance	Description	
<p>Audit Ref: 5.20</p> <p>With: Clause 12(3) Of Schedule 10.7</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>11 Category 2 metering installations certified with uncertainties greater than 0.6%.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%.</p> <p>Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----
Preventative actions taken to ensure no further issues will occur		Completion date
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-12-18
		Identified

Metering Installation Accuracy		
Non-compliance	Description	
<p>Audit Ref: 5.29</p> <p>With: Clause 21 of Schedule 10.7</p> <p>From: 01-Dec-17</p> <p>To: 18-Nov-18</p>	<p>11 Category 2 metering installations certified with uncertainties greater than 0.6%.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they ensure the total error is within 2.5% but there are no controls to ensure uncertainty is within 0.6%.</p> <p>Certification is cancelled for these installations which impacts on the compliance of the MEPs; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----
Preventative actions taken to ensure no further issues will occur		Completion date
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-12-18
		Identified

Error Calculation		
Non-compliance	Description	
<p>Audit Ref: 5.30</p> <p>With: Clause 22 Of Schedule 10.7</p> <p>From: 01-Sep-13</p> <p>To: 18-Nov-18</p>	<p>Some uncertainty results greater than 0.6%.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>I have rated the controls as weak because they do not ensure uncertainty levels are within 0.6% for a large proportion of metering installations.</p> <p>Certification is cancelled for these installations which impacts on the compliance and audit frequency of the MEPs; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----
Preventative actions taken to ensure no further issues will occur		Completion date
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-12-18
		Identified

Measuring Transformers Used In A Certified Metering Installation			
Non-compliance		Description	
Audit Ref: 5.37 With: Clause 28(4)(a)(i) of Schedule 10.7 From: 01-Dec-17 To: 18-Nov-18		Test facility, meeting the definition of a test facility, not always installed. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. There is very little impact because test facilities are seldom used for testing purposes for Category 2 installations; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date	Remedial action status
It is not clear from the definition in Part-1, test facility means a device that permits access to voltage and current circuits for testing purposes while the metering installation is in normal service how a test facility is intended to be used, nor have any examples of a test facility's use been found to date, either online or through communications with an MEP. In our interpretation of the definition, the approach we have been taking, which was developed as the most pragmatic, cost-effective, and functionally effective solution we could devise with no guidance from either the EA or any MEPs, is still compliant in that the CT wiring can be readily accessed and/or interrupted for the purposes of measuring CT secondary voltage and current. If it is considered that all test blocks must have 13 terminals, then we can reinstate the terminals absent from these test facilities, but would then need to devise an alternative housing and mounting method for the burden resistors, which would introduce additional chargeable fieldwork for the MEP. Note that we do not consider that mounting the burden resistors on the CTs is practical in many situations due to access, good working practice and safety concerns.		TBD	Disputed
Preventative actions taken to ensure no further issues will occur		Completion date	
We will give thought to an alternate method of burden resistor housing/installation, but in light of the apparent range of approaches currently in the industry as to best address this, we believe an industry consultation between MEPs and ATHs would be highly beneficial in identifying a satisfactory method that meets all functional, cost and safety requirements		28-22-19	

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 31 Of Schedule 10.7</p> <p>From: 01-Dec-14</p> <p>To: 18-Nov-18</p>	<p>5 installations had low burden and burden resistors were not installed.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>There is now a process to install resistors, but the checking processes do not identify when this is not done.</p> <p>The impact on settlement is likely to be minor because the overall error of the installations is measured and recorded.</p>	
Actions taken to resolve the issue		Completion date
The only remedy for these installations will be to return to site to install burden resistors and repeat the burden and Prevailing Load tests, although as identified elsewhere, the current burden resistor installation approach is not considered by all parties to be compliant .		TBD
Preventative actions taken to ensure no further issues will occur		Completion date
It is acknowledged that there is no alert in the workflows to prevent the job from being completed if the calculated burden is below the lower acceptable limit, so a modification to the relevant workflows will be initiated, and a check in the photochecking process added		28-22-19

Testing of Faulty Metering Installations			
Non-compliance	Description		
<p>Audit Ref: 7.1</p> <p>With: Clause 10.43(3) of Part 10</p> <p>From: 01-Dec-17</p> <p>To: 19-Nov-18</p>	<p>MEP not notified that 11 metering installations with measurement uncertainty greater than 0.6% are inaccurate and therefore have certification cancelled.</p> <p>MEP not notified that five metering installations with low burden are not fit for purpose and therefore have cancelled certification.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are recorded as moderate because there is room for improvement in order to identify and report on such situations.</p> <p>The impact on settlement could be moderate and the impact on MEPs is moderate because certification is cancelled, leading to non-compliance for the MEP in addition to non-compliance for Wells; therefore, the audit risk rating is medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Whilst there have been some installations certified where the uncertainties were above that allowed by the code, those uncertainty values were from a period of development of the test laboratory's certification report, and a re-test of these installations now would use the current uncertainty values which are within the limits allowed by the code, so as nothing else would have changed, it is questionable what would be achieved by a retest.</p>		-----	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>It is agreed that it would be of benefit to clearly show the Prevailing Load Test key values and intermediate results, and to prevent a test from being completed if the uncertainty is above 0.6% after ambient temperature has been factored, and so a modification to the relevant workflows and subsequent reports will be initiated</p>		28-22-19	