

Compliance Plan for Northpower ATH – May 2019

Provision of Accurate Information			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 10.6 of Part 10</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>Provision of incomplete certification reports;</p> <p>8 of 21 Metering installation certification reports checked did not indicate the location of the services access interface.</p> <p>6 of 21 Metering installation certification reports checked did not indicate whether the installation is HHR or NHH.</p> <p>7 of 21 metering installation certification reports did not contain the maximum interrogation cycle.</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>The controls are recorded as moderate because there is room for improvement.</p> <p>There is very little impact on other participants; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The new Test House management will meet with the field staff and Network administration staff to clarify the information that should be completed on the “Metering Installation Certification” report.		31/7/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The Network administration staff will check each “Metering Installation Certification” report for completeness when it is returned by the field staff. Any incomplete reports will be treated as “rework” and returned to the field staff member for completion before it is processed.</p> <p>The requirement to accurately and fully complete the report will be included in the “site visit tasks” process document as an on-going reminder to field staff.</p>		31/7/2019	

Metering Installation Type			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 8(2) of Schedule 10.7</p> <p>From: 12-Apr-18</p> <p>To: 12-Apr-19</p>	<p>8 of 21 Metering installation certification reports checked did not indicate the location of the services access interface.</p> <p>6 of 21 Metering installation certification reports checked did not indicate whether the installation is HHR or NHH.</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>The controls are recorded as moderate because there is room for improvement.</p> <p>There is very little impact on other participants; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The new Test House management will meet with the field staff and Network administration staff to clarify the information that should be completed on the "Metering Installation Certification" report.		31/7/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The Network administration staff will check each "Metering Installation Certification" report for completeness when it is returned by the field staff. Any incomplete reports will be treated as "rework" and returned to the field staff member for completion before it is processed.</p> <p>The requirement to accurately and fully complete the report will be included in the "site visit tasks" process document as an on-going reminder to field staff.</p>		31/7/2019	

Services Access Interface		
Non-compliance	Description	
<p>Audit Ref: 3.5</p> <p>With: Clause 10 of Schedule 10.4</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>8 of 21 Metering installation certification reports checked did not indicate the location of the services access interface.</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>The controls are recorded as moderate because there is room for improvement.</p> <p>There is very little impact on other participants; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The new Test House management will meet with the field staff and Network administration staff to clarify the information that should be completed on the "Metering Installation Certification" report.		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The Network administration staff will check each "Metering Installation Certification" report for completeness when it is returned by the field staff. Any incomplete reports will be treated as "rework" and returned to the field staff member for completion before it is processed.</p> <p>The requirement to accurately and fully complete the report will be included in the "site visit tasks" process document as an on-going reminder to field staff.</p>		31/7/2019
		Identified

Meter Requirements		
Non-compliance	Description	
<p>Audit Ref: 3.11</p> <p>With: Clause 26 (4) of Schedule 10.7</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>Seven metering installation certification reports did not contain the maximum 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	
Low	<p>The controls are recorded as moderate because there is room for improvement.</p> <p>There is very little impact on other participants; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The new Test House management will meet with the field staff and Network administration staff to clarify the information that should be completed on the "Metering Installation Certification" report.		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The Network administration staff will check each "Metering Installation Certification" report for completeness when it is returned by the field staff. Any incomplete reports will be treated as "rework" and returned to the field staff member for completion before it is processed.</p> <p>The requirement to accurately and fully complete the report will be included in the "site visit tasks" process document as an on-going reminder to field staff.</p>		31/7/2019
		Identified

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 28 (3) of Schedule 10.7</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>Seven metering installation certification reports did not contain the maximum 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	
Low	<p>The controls are recorded as moderate because there is room for improvement.</p> <p>There is very little impact on other participants; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue		Completion date
The new Test House management will meet with the field staff and Network administration staff to clarify the information that should be completed on the "Metering Installation Certification" report.		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The Network administration staff will check each "Metering Installation Certification" report for completeness when it is returned by the field staff. Any incomplete reports will be treated as "rework" and returned to the field staff member for completion before it is processed.</p> <p>The requirement to accurately and fully complete the report will be included in the "site visit tasks" process document as an on-going reminder to field staff.</p>		31/7/2019
		Identified

Requirement for Metering Installation Design Report			
Non-compliance	Description		
<p>Audit Ref: 5.3</p> <p>With: Clause 2 (4) Of Schedule 10.7</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>Design Report not recorded in metering installation certification report in 13 cases out of 21 checked.</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		
Low	<p>The controls are recorded as moderate because there is room for improvement.</p> <p>There is very little impact on other participants; therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The new Test House management will meet with the field staff and Network administration staff to clarify the information that should be completed on the "Metering Installation Certification" report.		31/7/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The Network administration staff will check each "Metering Installation Certification" report for completeness when it is returned by the field staff. Any incomplete reports will be treated as "rework" and returned to the field staff member for completion before it is processed.</p> <p>The requirement to accurately and fully complete the report will be included in the "site visit tasks" process document as an on-going reminder to field staff.</p>		31/7/2019	

Burden & Compensation		
Non-compliance	Description	
<p>Audit Ref: 5.40</p> <p>With: Clause 20(1) (b) Of Schedule 10.7</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>Northpower has not confirmed the accuracy of non-TWS CTs when the in-service burden is lower than the lowest test point recorded in the IEC standard.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>There is currently no process in place to resolve low burden issues.</p> <p>The impact on settlement is likely to be minor because the overall error of the installation was measured and recorded, and was within 2.5%</p>	
Actions taken to resolve the issue		Completion date
<p>The new Test House management will discuss this requirement with the technical staff and, if necessary, the auditor to gain a better understanding of what is required when category 2 and above metering installations are certified with regard to CT burdening.</p> <p>A procedure document will then be produced to provide guidance to the field staff in the small number of cases where a category 2 or higher site is being certified.</p>		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The paperwork completed by the field staff when certifying a category 2 or above metering installation will be checked by the Network administration staff to ensure that it is fully completed for the specialized tests.</p>		31/7/2019
		Investigating

Determine Metering Component Error		
Non-compliance	Description	
<p>Audit Ref: 5.61</p> <p>With: Clause 7(5) Of Schedule 10.4</p> <p>From: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>Northpower has not confirmed that the measurement uncertainty does not exceed one third of the maximum permitted error when calibrating meters.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>There is currently no process in place to record uncertainty on calibration reports.</p> <p>The impact on settlement is likely to be minor because the overall error measured and recorded was well below the maximum allowed.</p>	
Actions taken to resolve the issue		Completion date
The new Test House management will discuss this issue with the Test House technical staff. A review of the calibration reports will be made and the reports modified to include an uncertainty statement.		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Meter calibration reports will be periodically reviewed to ensure they are being fully completed.		31/7/2019
		Identified

Class B ATH Calibrating Metering Components		
Non-compliance	Description	
Audit Ref: 5.62 With: Clause 16A.20 From: 10-May-18 To: 12-Apr-19	Measurement uncertainty not recorded on meter calibration report. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	There is currently no process in place to record uncertainty on calibration reports. The impact on settlement is likely to be minor because the overall error measured and recorded was well below the maximum allowed.	
Actions taken to resolve the issue		Completion date
The new Test House management will discuss this issue with the Test House technical staff. A review of the calibration reports will be made and the reports modified to include an uncertainty statement.		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Meter calibration reports will be periodically reviewed to ensure they are being fully completed.		31/7/2019
		Choose an item.

Investigation 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: 10-May-18</p> <p>To: 12-Apr-19</p>	<p>MEP not notified that a meter installation 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: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<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
<p>The new Test House management will discuss this requirement with the technical staff and, if necessary, the auditor to gain a better understanding of what is required when category 2 and above metering installations are certified with regard to CT burdening.</p> <p>This ICP will be identified and the certification report will be reviewed so that appropriate action can be taken to remedy the situation. Note that Northpower Test House completes metering work solely for Northpower MEP, no other MEPs are affected.</p>		31/7/2019
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The paperwork completed by the field staff when certifying a category 2 or above metering installation will be checked by the Network administration staff to ensure that it is fully completed for the specialized tests.</p>		31/7/2019
		Investigating