

## Compliance Plan for Delta ATH – August 2020

Metering Installation Type			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 8(2) of Schedule 10.7 From: 12-Nov-19 To: 22-Jun-20	1 of 63 Metering installation certification reports checked did not indicate whether the installation is HHR or NHH. Potential impact: Low 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 as Delta conducts checking of all certification reports prior to finalisation of the reports. There is very little impact on other participants; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Data entry correctness reminder to be sent to all technicians.		30-10-20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Photo Checking process reviewed, and changes implemented.		Complete	

Advise MEP of Records, Certificates or Reports for a Metering Installation		
Non-compliance	Description	
Audit Ref: 3.9 With: Clause 14 Of Schedule 10.4  From: 10-Jan-19 To: 22-Jun-20	Certification records provided to the MEP late for four of ten metering installations. 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 there is room for improvement. The impact on MEPs is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Aurora act as an agent for Registry updates. To alleviate these issues, this function is to be migrated in-house urgently. - Conduct Gentrack/Registry training for Delta staff. - Commence Registry updates by Delta staff		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
Migrate Gentrack and Registry management and administration from Aurora to Delta. Manual data entry in Gentrack Velocity to be performed and monitored locally.		30-12-30
		Identified

Meter Requirements		
Non-compliance	Description	
<p>Audit Ref: 3.11</p> <p>With: Clause 26 (4) of Schedule 10.7</p> <p>From: 09-Apr-18</p> <p>To: 22-Jun-20</p>	<p>One metering installation certification report did not contain the maximum interrogation cycle.</p> <p>18 metering installation certification reports with maximum interrogation cycle incorrectly recorded.</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 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
Delta will check with each MEP we install meters for to ensure we have the correct maximum interrogation periods for all meters we install. Paperwork will be amended where required.		30-11-20
Preventative actions taken to ensure no further issues will occur		Completion date
Delta will check with each MEP we install meters for to ensure we have the correct maximum interrogation periods for all meters we install. Paperwork will be amended where required.		30-11-20
		Identified

Determine Maximum Interrogation Cycle		
Non-compliance	Description	
<p>Audit Ref: 3.14</p> <p>With: Clause 36 (3) of Schedule 10.7</p> <p>From: 09-Apr-18</p> <p>To: 22-Jun-20</p>	<p>One metering installation certification report did not contain the maximum interrogation cycle.</p> <p>18 metering installation certification reports with maximum interrogation cycle incorrectly recorded.</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 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
Delta will check with each MEP we install meters for to ensure we have the correct maximum interrogation periods for all meters we install. Paperwork will be amended where required.		30-11-20
Preventative actions taken to ensure no further issues will occur		Completion date
Delta will check with each MEP we install meters for to ensure we have the correct maximum interrogation periods for all meters we install. Paperwork will be amended where required.		30-11-20
		Identified

Metering Component Stickers		
Non-compliance	Description	
Audit Ref: 4.14 With: Clause 8(2) of Schedule 10.8  From: 28-Aug-18 To: 22-Jun-20	Metering component sticker does not include the name of the calibration laboratory. 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 there is room for improvement. There is very little impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Stickers have been amended to contain the calibration lab. These new stickers have been ordered and will be distributed to all installers.		30-11-20
Preventative actions taken to ensure no further issues will occur		Completion date
Stickers have been amended to contain the calibration lab. These new stickers have been ordered and will be distributed to all installers.		30-11-20
		Identified

ATH must not certify Metering Installations under certain circumstances		
Non-compliance	Description	
Audit Ref: 5.1 With: Clause 8(2) of Schedule 10.8  From: 30-Jul-19 To: 22-Jun-20	1 Cat 3 installation certified with uncertainty greater than 0.3%. 1 Cat 2 installation certified with class 3 CTs.  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 there is room for improvement. There is very little impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Class 3 CTs on this site are to be changed and the site recertified. The identified cat 3 site will be visited and recertified using the fully calibrated certification method.		30-11-20
Preventative actions taken to ensure no further issues will occur		Completion date
CTs with multiple class ratings will no longer be certified. Cat 3 sites will now be certified using the fully calibrated method.		Complete
		Identified

Requirement for Metering Installation Design Report		
Non-compliance	Description	
Audit Ref: 5.3 With: Clause 2 (4) Of Schedule 10.7  From: 06-Dec-18 To: 22-Jun-20	Design report reference not recorded in metering installation certification report in 2 cases out of 63 checked. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as Delta conducts checking of all certification reports prior to finalisation of the reports.  There is very little impact on other participants; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Data entry correctness reminder to be sent to all technicians.		30-10-20
Preventative actions taken to ensure no further issues will occur		Completion date
Photo Checking process reviewed, and changes implemented.		Complete
		Identified

Statistical Sampling		
Non-compliance	Description	
<p>Audit Ref: 5.26</p> <p>With: Clause 16 of Schedule 10.7</p> <p>From: 06-Jun-18</p> <p>To: 22-Jun-20</p>	<p>Incorrect statistical sampling certification applied.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>I have rated the controls as weak because the Delta process did not ensure correct selection of samples.</p> <p>The impact could be significant, as it is likely that inaccurate metering installations have been recertified. The audit risk rating is medium.</p>	
Actions taken to resolve the issue		Completion date
<p>The non-compliances regarding stat sampling were due and error made by an employee that no longer works for DELTA. Post incident investigations were performed by the Electricity Authority and our process was found to ensure correct sample selection. The replacement ATH Compliance employee was also checked during this investigation and found to have a clear understanding of the selection process demonstrated by other stat sampling projects. At the time of the audit this had already been cleared so we find this unfair.</p>		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The non-compliances regarding stat sampling were due and error made by an employee that no longer works for DELTA. Post incident investigations were performed by the Electricity Authority and our process was found to ensure correct sample selection. The replacement ATH Compliance employee was also checked during this investigation and found to have a clear understanding of the selection process demonstrated by other stat sampling projects.</p>		Complete
		Disputed



Error Calculation		
Non-compliance	Description	
Audit Ref: 5.30 With: Clause 22 Of Schedule 10.7  From: 01-Oct-19 To: 22-Jun-20	Uncertainty higher than 0.3% for 1 Cat 4 installation. 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>	I have rated the controls as moderate because the Delta process would not normally allow certification to occur in this situation.  The impact on settlement is likely to be minor because the overall error is within the category limits.	
Actions taken to resolve the issue		Completion date
This ICP was mistakenly certified with completing the MR-007 error calculation sheet. This was identified and the site was revisited and recertified correctly before the audit as per the below result. <div> <div> <i>Total uncertainty</i>  <i>Total site error</i> </div> <div> <b>Actual average site errors</b>  <b>0.204</b>  <b>0.381</b>  <b>Pass</b> </div> </div>		Complete
Preventative actions taken to ensure no further issues will occur		Completion date
The MR-007 error calculation sheet is now used for all Cat 3 and 4 jobs.		Complete
		Cleared

Installations Incorporating Control Devices		
Non-compliance	Description	
<p>Audit Ref: 5.42</p> <p>With: Clause 33(2) of Schedule 10.7</p> <p>From: 06-Jun-18</p> <p>To: 22-Jun-20</p>	<p>13 control devices certified with incorrect expiry dates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>I have rated the controls as weak because the Delta process does not ensure expiry dates are correctly calculated.</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
Delta will review all Cat2 and higher MICs completed during the period since the last ATH audit. Incorrect expiry dates will be amended and MIC reports reissued. Cat1 relay expiry dates were being incorrectly recorded based on the lab calibration/certification of the device causing them to expire before the ICP. Correct certification of the device was still performed during the install. These MIC reports will be amended and reissued.		30-10-2020
Preventative actions taken to ensure no further issues will occur		Completion date
An automated certification process has been trialed during the period since Delta's last ATH audit. This has incorrectly certified LCDs for a period of 15 years based on a Cat1 timeframe. This new process was not reliable and has been abandoned, with Delta returning to manual entry of all expiry dates. Cat1 relay expiry dates are now being correctly recorded based on the field certification date.		Complete
		Identified