

Compliance plan for Advanced Metering Services Limited (VEMS) – 2020

Quality Management Systems			
Non-compliance	Description		
Audit Ref: 2.6 With: Clause 3(1)(b) & (d)(ii) of Schedule 10.3 From: 01-Apr-20 To: 23-Nov-20	The ISO 17025 accreditation does not cover field activities for Category 4 installations. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because VEMS has had ISO 17025 and 9001 for many years and this is an administrative oversight. It's unlikely the metering installations affected will be inaccurate, but the cancelled certification is a moderate impact, because it leads to additional cost.		
Actions taken to resolve the issue		Completion date	Remedial action status
This was an administration oversight and IANZ, in conjunction with MSL, have agreed to include the field activities in the scope, which will be finalized once both corrective actions are signed off.		December 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This was a one-off administration error that was missed by multiple parties. Additional attention will be paid to accreditations as they are issued in the future.		In place	

Non-compliance	Description	
<p>Audit Ref: 4.9</p> <p>With: Clause 5 of Schedule 10.4</p> <p>From: 11-May-20</p> <p>To: 23-Nov-20</p>	<p>Working standard 25505 has a calibration error because its overall error is 1.185%</p> <p>Potential impact: High</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 does not appear to be a pass/fail threshold set for the calibration of working standards.</p> <p>The impact is not known but all installations certified with standard 25505 may need to be re-tested.</p>	
Actions taken to resolve the issue		Completion date
<p>A pass/fail threshold for test equipment will be implemented based on the manufacturer's stated specifications.</p> <p>The previous calibration on this particular equipment is being reviewed based on the above statement. The results of the review will determine any further steps that need to be taken.</p>		30 December 2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>In addition to including a pass/fail threshold, we are undertaking a full review of the current testing procedures for the use of working standards.</p>		March 2021
		Identified

Data Storage Device Certification		
Non-compliance	Description	
<p>Audit Ref: 4.12</p> <p>With: Clause 5 of Schedule 10.8</p> <p>From: 01-Mar-20</p> <p>To: 23-Nov-20</p>	<p>10 data storage devices certified since the previous audit when they do not comply with the Code, as recorded in the type test report.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 although this matter was raised in the previous audit, there were still a further 10 metering installations certified.</p> <p>The impact on settlement is minor because interrogation occurs daily, but when power is lost then restored there is a risk of losing data for a small number of ICPs. The greater impact is on ARC Innovations as the MEP because certification is cancelled.</p>	
Actions taken to resolve the issue		Completion date
<p>The 10 data storage devices identified in this report are all reconciled non-half hourly (NHH), so we are working with the MEP to amend the certification reports to NHH.</p> <p>We have been in discussions with the MEP and the Electricity Authority on this non-compliance. The MEP will ensure that, where possible, Arc meters will be displaced with EDM meters in all cases except where removing the Arc meter would affect the mesh network. In these rare cases, the installation will be certified as non-half hourly.</p>		Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
No further Arc installation will be certified as half hourly.		In place

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: 04-Sep-20</p> <p>To: 26-Nov-20</p>	<p>ICP 0000030636UNFBB had a test result of + 1.987%, meaning at least one of the components is operating outside its class.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</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 have been improved during the audit period and will identify most issues.</p> <p>The impact on settlement is low because there was only one example identified. There is also an impact on the MEP because certification needs to be cancelled.</p>	
Actions taken to resolve the issue		Completion date
Certification will be cancelled, and the site will be recertified as soon as access arrangements can be made.		30 Jan 2021
Preventative actions taken to ensure no further issues will occur		Completion date
A review of the certification checking process will be undertaken and any corrective actions identified will be implemented.		30 Jan 2021
		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-Mar-20</p> <p>To: 26-Nov-20</p>	<p>ICP 0000030636UNFBB had a test result of + 1.987%, meaning at least one of the components is operating outside its class.</p> <p>10 installations certified despite the data storage device failing type testing.</p> <p>Potential impact: High</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 they have been improved during the audit period.</p> <p>The impact on settlement is low because there were only a small number of examples found.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Certification will be cancelled for ICP 0000030636UNFBB, and the site will be recertified as soon as access arrangements can be made.</p> <p>The 10 data storage devices identified in this report are all reconciled non-half hourly (NHH), so we are working with the MEP to amend the certification reports to NHH.</p> <p>We have been in discussions with the MEP and the Electricity Authority on this non-compliance. The MEP will ensure that, where possible, Arc meters will be displaced with EDM meters in all cases except where removing the Arc meter would affect the mesh network. In these rare cases, the installation will be certified as non-half hourly.</p>		30 Jan 2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A review of the certification checking process will be undertaken and any corrective actions identified will be implemented.</p> <p>No further Arc installation will be certified as half hourly.</p>		2023	

Selected Component - Circumstances Where Method May Be Used		
Non-compliance	Description	
<p>Audit Ref: 5.18</p> <p>With: Clause 11(4) of Schedule 10.7</p> <p>From: 01-Mar-20</p> <p>To: 26-Nov-20</p>	<p>10 installations certified as HHR despite the data storage devices not being accurate or fit for purpose.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 data storage devices have been certified for many years despite not being suitable for recording HHR.</p> <p>The impact on settlement is recorded as low because I have only considered the current audit period, where there were 10 examples.</p>	
Actions taken to resolve the issue		Completion date
<p>The 10 data storage devices identified in this report are all reconciled non-half hourly (NHH), so we are working with the MEP to amend the certification reports to NHH.</p> <p>We have been in discussions with the MEP and the Electricity Authority on this non-compliance. The MEP will ensure that, where possible, Arc meters will be displaced with EDM meters in all cases except where removing the Arc meter would affect the mesh network. In these rare cases, the installation will be certified as non-half hourly.</p>		Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
No further Arc installation will be certified as half hourly.		In place
		Identified

Insufficient Load		
Non-compliance	Description	
Audit Ref: 5.25 With: Clause 14 of Schedule 10.7 From: 14-Aug-19 To: 26-Nov-20	Inadequate additional integrity checks conducted for two ICPs. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as weak because they did not identify issues with these two installations. The impact on settlement and participants is moderate because the retailers were not submitting correct volumes, and they had to re-bill their customers.; therefore, the audit risk rating is medium.	
Actions taken to resolve the issue		Completion date
This has been implemented as part of the certification checking validation where test block photos in all CT installations are inspected prior to certification.		In place
Preventative actions taken to ensure no further issues will occur		Completion date
This has been implemented as part of the certification checking validation where test block photos in all CT installations have inspected prior to certification.		In place
		Identified

Data storage device requirements		
Non-compliance	Description	
<p>Audit Ref: 5.45</p> <p>With: clause 5(1) of Schedule 10.8</p> <p>From: 01-Mar-20</p> <p>To: 26-Nov-20</p>	<p>10 installations certified as HHR despite the data storage devices not being accurate or fit for purpose.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 data storage devices have been certified for many years despite not being suitable for recording HHR.</p> <p>The impact on settlement is recorded as low because I have only considered the current audit period, where there were 10 examples.</p>	
Actions taken to resolve the issue		Completion date
<p>The 10 data storage devices identified in this report are all reconciled non-half hourly (NHH), so we are working with the MEP to amend the certification reports to NHH.</p> <p>We have been in discussions with the MEP and the Electricity Authority on this non-compliance. The MEP will ensure that, where possible, Arc meters will be displaced with EDM meters in all cases except where removing the Arc meter would affect the mesh network. In these rare cases, the installation will be certified as non-half hourly.</p>		Dec 2020
Preventative actions taken to ensure no further issues will occur		Completion date
No further Arc installations will be certified as half hourly.		In place
		Identified