

## Compliance Plan for Intellihub Ltd MEP Material Change – 2022

<b>Material change audit</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 1.11 With: Clause 16A.11  From: 06-Apr-22 To: 11-May-22	Material change audit not completed within five business days of change. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating:1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as strong as the Intellihub MEP staff are aware of this requirement but in this case were not made aware of the change in sufficient time to arrange the audit. The impact is assessed to be low, as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Intellihub agrees with the auditors' comments.	Date	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Intellihub agrees with the auditors' comments and will be cognizant of these requirements if a similar scenario should arise in future	Date	

<b>Participants to Provide Accurate Information</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.5 With: Clause 11.2 and Clause 10.6  From: 01-Aug-21 To: 15-Apr-22	All practicable steps not taken to ensure data is correct and that incorrect data is corrected as soon as practicable.  Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as moderate in this area because there are still a small number of areas where improvements can be made. Very few of the registry related discrepancies have an impact on participants, customers or settlement. The only relevant ones in this regard are tariff related and there were only a small number. The audit risk rating is low.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Intellihub will put in place resource to focus on data quality for all ATH's. Intellihub is working with the ATH's and our IT team to implement long term solutions and we continue to work to identify areas for improvement as part of a continuous improvement cycle.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above		Ongoing
<b>Remedial action status</b>		
Investigating		

Registry Notification of Metering Records		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 2 of Schedule 11.4 From: 01-Aug-21 To: 15-Apr-22	435 late registry updates. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as the process is robust and accuracy of records is required before updates occur. The impact on settlement and participants is minor, therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Intellihub is continuing to review the mechanisms for interacting with contracted ATH's with a view to reducing time delays in retrieving data. Intellihub will also be investigating opportunities to improve work order exchanges with Traders. We will also be working with our IT team to implement long term solutions.		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
As above Intellihub will continue to provide feedback on exceptions to ATH's and remind them of their obligations to promptly return paperwork.		Ongoing
Investigating		

<b>Changes to Registry Records</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 4.10 With: Clause 3 of Schedule 11.4 From: 01-Aug-21 To: 15-Apr-22	Some records updated on the registry later than 10 business days. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Field technicians have been advised of the importance of the accurate and timely return of paperwork, as well as the timely generation of certification reports.	Ongoing	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Intellihub will continue to provide feedback on exceptions to contractors and remind them of their obligations to return paperwork promptly	Ongoing	

<b>Accurate and Complete Records</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 5.1 With: Clause 4(1)(a) and (b) of Schedule 10.6, and Table 1, Schedule 11.4 From: 01-Aug-21 To: 15-Apr-22	Some fields not accurate and complete in a sample of 49 certification records. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as moderate because there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Intellihub MEP will continue to communicate with ATHs and provide them with the summary of all technical and compliance issues identified with Installation Certification Reports during the course of this audit. We will also look to enhance our internal audit of certification reports	Ongoing	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Intellihub will continue to engage with ATH's on better clarity and presentation of certification reports to ensure these are fit for purpose. Over the past nine months, Intellihub has instigated monthly Technical Compliance sessions with contracted Approved Test Houses Wells and Delta with the objectives of improving communication, alignment and ensuring we both meet Code Compliance. We have already seen good value out of these meetings, these will remain ongoing as avenues to discuss any Code or Technical issues as they arise.	Ongoing	

Provision of Registry Information		
Non-compliance	Description	
Audit Ref: 6.2 With: Clause 7 (1), (2) and (3) of Schedule 11.4 From: 01-Aug-21 To: 15-Apr-22	Two incorrect registry records. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	I have recorded the controls as strong in this area. Sound validations are in place to ensure data is accurate. The discrepancies found have no impact on participants, customers or settlement. The audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
These appears to both have been simple typographical data entry errors and we have not seen any other instances of the same issue.	21/04/2022	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	Completion date	
As above	21/04/2022	

<b>Correction of Errors in Registry</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 6.3 With: Clause 6 of Schedule 11.4  From: 01-Aug-21 To: 15-Apr-22	Discrepancies not always resolved within five business days.  Potential impact: Medium Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	I have recorded the controls as moderate in this area because there is room for improvement. Very few of the discrepancies have an impact on participants, customers or settlement. The audit risk rating is low.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Intellihub will continue to resolve discrepancies which have the highest impact on participants.	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Intellihub is committed to an ongoing focus on continuous improvements to the quality and completeness of all of its transactions.	Ongoing	

Non-compliance	Description		
Audit Ref: 6.4 With: Clause 20 of Schedule 10.7 From: 10-Jan-22 To: 19-Apr-22	Certification cancelled and registry not updated within 10 business days for 336 ICPs with failed sum-checks. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	I have recorded the controls as strong in this area as Intellihub has reinstated a process to identify failed sum-checks. 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	
As recorded in the audit observations, Intellihub was unable to identify ICPs requiring cancellation for a temporary period due to a technical issue following the implementation of a new meter data management system. This issue has since been resolved, and Intellihub is now able to identify ICPs requiring cancellation within the required timeframes.	19/04/2022	Cleared	
Preventative actions taken to ensure no further issues will occur	Completion date		
As above	19/04/2022		



Certification and Maintenance		
Non-compliance	Description	
Audit Ref: 7.1 With: Clause 10.38 (a)  From: 01-Aug-21 To: 15-Apr-22	869 ICPs with cancelled certification.  Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  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
Intellihub has an ongoing programme of recertification using the selected component method for metering installations with cancelled certification (and for which recertification by statistical sampling is not an available option). Intellihub is in the process of recertifying the six Category 2 ICPs which have had certification cancelled due to low burden	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Certification Tests		
Non-compliance	Description	
Audit Ref: 7.2 With: Clause 10.38(b)  From: 23-Oct-20 To: 27-May-21	All required tests not conducted for five category 1 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 as Intellihub has confirmed that tests are normally conducted by the ATHs, though further checking is required to ensure all required testing is conducted by ATHs. The impact is low as the accuracy of the metering installation is unlikely to have been impacted by the prevailing load test not being completed, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
RE: Prevailing load test not conducted for five Category 1 metering installations.  Intellihub interpretation of Line 2 of Table 3 in Part 10 is that a Prevailing Load Test should not be required when a meter is not being changed, and the installation certification expiry date remains unchanged.  We are currently awaiting a response from the Authority to clarify this. In the interim, Intellihub is ensuring that all other tests and checks are completed including a raw meter data output test to confirm installation accuracy.  RE: No testing conducted on second meter in metering installation; Intellihub has followed this up with the Approved Test House. The reason for the site visit was to install an aerial to improve communication. The ATH did not believe the integrity of the metering was compromised. For the avoidance of doubt, the ATH conducted comprehensive tests/checks to ensure that the metering installation certification was maintained.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Ongoing	

Timekeeping Requirements		
Non-compliance	Description	
Audit Ref: 7.10 With: Clause 23 of Schedule 10.7 From: 30-Oct-21 To: 11-May-22	Two ICPs with time dependent meter registers with time are not monitored every 12 months. 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 recorded the controls as moderate as Intellihub has the capability to identify this, but regular monitoring 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
Intellihub will arrange a site visits to appropriately resolve these issues.	Ongoing	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	Date	

Time Errors for Metering Installations	
Non-compliance	Description
Audit Ref: 10.7 With: Clause 8(4) of Schedule 10.6 From: 11-Apr-22 To: 17-Apr-22	43 examples of clock errors outside the allowable thresholds in the most recent reports.  Incorrect threshold applied for reporting time errors of Category 2 meters.  Potential impact: Medium Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	I have recorded the controls as strong because clocks are synchronised during every successful interrogation. The impact is considered minor because most clock errors are small and are corrected within one half hour. The audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
<b>Time Synchronisation:</b> There are no further preventative actions identified that we can reasonably implement <b>Reporting:</b> Intellihub automatically synchronizes any clock error between 5 and 10 seconds for both Category 1 and Category 2 metering installations. Intellihub has now adjusted its reporting to Traders to include >=10 second exceptions (which needed to be manually corrected) for Category 2 metering installations.		07/06/2022	Identified for time errors outside the allowable thresholds  Cleared for Category 2 reporting threshold
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		07/06/2022	