

AUDIT GUIDELINE

Metering Coordinator Auditing

PREPARED BY: AEMO Metering

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Approved for distribution and use by:

APPROVED BY: PETER GEERS

TITLE: Chief Strategy and Markets Officer

DATE: 21/02/2020



VERSION RELEASE HISTORY

Version	Effective Date	Summary of Changes
1.0	August 2018	Metering Coordinator Audit Process – Initial Version
1.1	July 2020	Reviewed and updated based on information provided from outcomes of first yearly audit, updated to new template



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CHAPTER 1. INTRODUCTION

1.1 Purpose and Scope

This Audit Guideline – Metering Coordinator Auditing (Guideline) is written to provide assistance to MCs in complying with the condition of registration relating to the requirement for an annual independent audit review of their compliance with the National Electricity Rules (NER) and procedures under the NER.

1.2 Definitions and Interpretation

The Retail Electricity Market Procedures – Glossary and Framework:

- (a) is incorporated into and forms part of this Guideline; and
- (b) should be read with this Guideline.

1.3 Related AEMO Documents

Title	Location
Retail Electricity Market Glossary and Framework	http://www.aemo.com.au/Electricity/National- Electricity-Market-NEM/Retail-and-metering
Guide to the Role of the Metering Coordinator (MC)	http://www.aemo.com.au/Electricity/National- Electricity-Market-NEM/Retail-and- metering/Accreditation-and-Registration



CHAPTER 2. AUDIT PROCESS

2.1 General

The aim of auditing the MC is twofold. First, to ensure that the MC conforms to the NER and the relevant Procedure requirements. Second, to review the management of *metering installations* by the MC to ensure that high accuracy metering data is obtained for market settlement processes.

2.2 Audit Procedure

The audits must be carried out by an independent auditor within one month of each anniversary of the effective date of the MC's registration. The audit procedure flowchart is illustrated in Figure 1 below and outlined in more detail in the following sections.

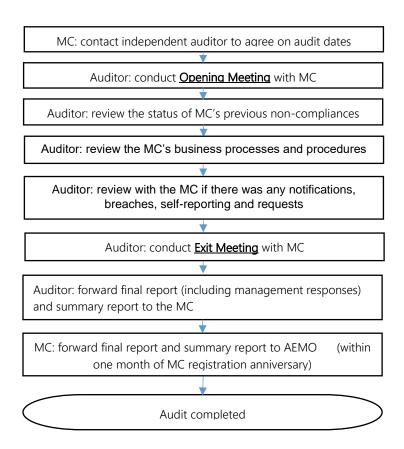


Figure 1: Audit Process



2.2.1 MC Audit Process

MC audit reports provided to AEMO must as a minimum provide evidence of the following:

- 1. Evidence of the independence of the auditor and suitability of the auditor to assess compliance.
- 2. At the commencement of the audit, hold an audit opening meeting taking note of the MC's Representatives attending the meeting. [complete Appendix: A1 and A2]
- 3. Review the items of non-compliance found during any previous MC audits and obtain objective evidence to ensure that the outstanding items of non-compliance have been rectified or a corrective action plan has been developed and approved by AEMO or the AER as necessary depending on the nature of the non-compliance. The list of previous non-compliance items must be provided to the independent auditor by the MC. [complete Appendix: A3 and A4]
- 4. Review any notifications, breaches, self-reporting and requests from or to regulatory bodies including *AEMO*, the *AER* and jurisdictional regulators. [complete Appendix: A5]
- 5. Perform review of the MC's business processes and procedures. [complete Appendix: A6]
- At the completion of the audit, hold an audit exit meeting with the relevant MC Representatives to discuss the items of non-compliance found during the audit. [complete Appendix: A7]
- 7. MC provides management response to audit findings including any corrective action plan(s) for any non-compliance.
- 8. A summary report must include a written summary of the auditor's overall conclusion on how the audit went and a list of any findings. [complete Appendix: B]

2.3 Audit and Summary Report

The report template consists of the following parts:

Appendix A: Audit Report

- A.1 MC Audit Contact Details;
- A.2 MC Audit Open Meeting (Register of Attendance);
- A.3 MC Audit Review of previous Non-Compliances;
- A.4 MC Audit Additional Comments: Previous Non-Compliances;
- A.5 MC Audit Notifications, Breaches, Self-Reporting, Requests;
- A.6 MC Audit Review MC Processes and Procedures; and
- A.7 MC Audit Exit Meeting (Register of Attendance / Final Comments).

Appendix B: MC Audit - Summary Report



2.4 Non-Compliance Definitions

For consistency the independent auditor must classify all identified non-compliances as critical, major or procedural. A definition of each non-compliance is illustrated in Table 1 below:

Table 1: Non-compliance definitions

Definition
 Examples of a Critical non-compliance would include: Failure to provide metering data in the format and/or the accuracy required by the NER or the Metrology Procedure; A breach of the NER or the Metrology Procedure (i.e., failure to obtain an exemption within specified time prescribed under clause 7.8.10(a) of the NER for a non-compliant metering installation where a malfunction or interruption has occurred to metering installation); Failure to install and appropriate check metering installation for type 1 and 2 metering installations; and Commenced Meter Churn when not the current MC in MSATS. No metering installation at connection point as prescribed under clause 7.8.1(a).
 Examples of a Major non-compliance would include: Demonstrated deficiencies in a process or procedure, which threatens the ongoing accurate performance of a metering installation, such as failure to test or inspect equipment within designated timeframes in the NER or an alternate method specified in the AEMO approved MAMS; No action taken to rectify the non-compliance(s) found during the previous audit which may result in the provision of inappropriate metering data for settlements; and No AEMO approved MAMS (if there is an indication that the MC is not testing in accordance to the NER). No signed contract or service level agreement in place with services provider and/or sub-contractors.
 Examples of a Procedural non-compliance would include: Weakness identified in a Procedure or Process that does not impact on the metering installation; An area for improvement in a procedure or process; MC failing to follow its own procedures or processes; and Poor sealing of metering installation.

Where non-compliances are identified and reported by the independent auditor, the MC must develop a corrective action plan containing date(s) by which the non-compliances will be corrected. These dates are to be specified in the MC management response. If *AEMO* considers the dates to be unacceptable, *AEMO* will liaise with the MC and discuss alternative corrective dates.



CHAPTER 3. AEMO SUBMISSIONS

3.1 Final Report

The MC must provide the following documents to AEMO in editable word or editable PDF format:

- Final audit reports including management responses; and
- Audit summary report.

Please email documents to: meter@aemo.com.au

3.2 Request for further information

AEMO at times if required, may seek the MC's consent to contact the independent auditor directly to provide further information in relation to non-compliances identified in the audit report.



APPENDIX A. MC AUDIT REPORT

A.1 MC Audit - Contact Details

MC De	MC Details					
Organisation Name						
MC Participant ID						
MC Pri	mary Representative					
	Address					
	Email					
	Phone Number					

Auditor Details	
Organisation Name	
Organisation ABN	
Auditor Name	
Address	
Phone Number	
Audit Date	
Auditor's Signature	



A.2 MC Audit - Opening Meeting (Register of Attendance)

Date				
Name	Position	Email	Phone	Signature

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A.3 MC Audit - Review of previous Non-Compliances

Review the MC's database/records to ensure the non-compliance items raised in the previous MC audit have been rectified.

	Previous N	Ion-Compliances Found	Audit Outcome		
Reference Number	Non-Compliance Item	Non-Compliant C / M / P	Resolved Y / N	Auditor's Comment	

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A.4 MC Audit - Additional Comments: Previous Non-Compliances

Review any previous non-compliances from previous rounds of audits. Has the MC addressed these non-compliances? If not, why not?	

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A.5 MC Audit – Notifications, Breaches, Self-Reporting, Requests

Review any notifications, breaches, self-reporting and requests from or to regulatory bodies including <i>AEMO</i> , the <i>AER</i> and jurisdictional regulators. e.g. Letters of No Action from the AER, RM30 reports or breach notices from AEMO, jurisdictional findings						

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A.6 MC Audit – Review MC Processes and Procedures

	Audit Outcome							
			Compliant Non-Compliant			oliant		
Question	Review Checklist Activity	NER / Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
Meter Provider (MP) Sen	vices		l			1		
1. Can the MC provide evidence that its MPs have been appointed	Review the contractual agreement between MC and MPs to determine: Who they are and that the responsibilities of provision, installation and maintenance of a metering installation under the NER are fulfilled	Clause 7.3.2(a) and 7.3.2(b) Schedule S7.2.3						

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								AUSTRALIAN ENERGY MARKET OPERATOR		
	Audit Item			Audit Outcome						
	Review Checklist Activity		NER /	Compliant	Non	-Comp	liant			
Question		Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
evidence that its MP is testing and inspecting metering installations in accordance with the NER or within the MC's	Does the MC have an	S7.6.1								

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								AUSTRALIAN ENERGY MARKET OPERATOR			
	Audit Item			Audit Outcome Compliant Non-Compliant							
		NER /	Compliant	Non	-Comp	oliant					
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response			
3. How does the MC ensure that the components, and the accuracy and testing of each of its metering installations complies with the NER requirements?	 Review MC processes to ensure the timely testing of CTs and VTs and meters in accordance with the NER or an approved MAMS Does the MC have an audit process to ensure that its appointed MPs are fulfilling their responsibilities in accordance with the NER and procedures authorised under the NER? Can the MC demonstrate that they have access to test and inspection results? Where an inspection or test has identified a noncompliance or other finding needing correction, can the MC demonstrate that corrective and preventative actions have been implemented 	-									

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								AUSTRALIAN ENERGY MARKET OPERATOR			
	Audit Item		Audit Outcome								
		NER /	Compliant	Non	-Comp	liant					
Question		Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response			
per the NER	to ensure records are retained										

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								AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NER /	Compliant	Non	-Comp	liant		
Question		Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
5. Review any contractual agreement between the MC and its MPs regarding the metering register	MPs concerned to retain the <i>metering register</i> on the MC's behalf?	S7.1.1, S7.1.2 Clause 7.9.5						

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ALISTRALIAN ENERGY MARKET OPERATI										
	Audit Item						Audit Outcome			
		NER /	Compliant	Non	-Comp	liant				
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
6. Can the MC provide evidence that each new metering point is located as close as practical to the connection point?		Clause 7.8.7								
7. Does the MC have a procedure with its MPs for making changes to parameters and settings within a metering installation?	 Review contractual agreements with the MPs and MDPs (where applicable) to confirm alterations to metering installation and report on how the MC confirms changes Does the MC have processes to notify/obtain approval from AEMO where there is a change in the classification of metering installation type (e.g. from Type 2 to Type1)? 									

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								AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NER /	Compliant	Non	-Comp	liant		Management Response
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
8. Can the MC provide evidence that the required overall error calculations are performed for its Type 1 and 2 and HV Type 3 and 4 metering installations?	overall error calculations employed by the MC	Schedule S7.4.3 Table S7.4.3.2 Table S7.4.3.3 Table S7.4.3.4						
9. Can the MC provide evidence that all relevant information is provided to a new MP as part of <i>meter churn</i> ?	 What process does the MC use when initiating a new metering installation connection? Review what information does the MC provide to the new MP in the case of meter churn? 	7.3.1(a)						

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			1					AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NER /	Compliant	Non	ı-Comp	oliant		
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
Meter Data Provider (M	MDP) Services	1	1	1				
its MDPs have been appointed for the	Review the contractual agreement or service level agreements between MC and MDPs to determine: Who they are That the responsibilities of collection, processing and delivery of the metering data under the NER are fulfilled That the agreement includes all the obligations of an MDP The MDPs access to the meter (e.g. via a read only password for the purposes of collecting interval metering data)	7.3.2(h)						
11. Can the MC provide evidence that access to each metering installation is scheduled appropriately to ensure congestion does not occur?	and procedures on scheduling access Review any contractual	Clause 7.15.5(b)						

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								AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NER /	Compliant	Non	-Comp	oliant		
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
12. How does the MC ensure that the metering installation clock is reset?	 Is the clock reset by the MDP when the meter is read, or by other means? 							
13. Can the MC provide evidence that collection of <i>interval</i> energy data is collected in accordance with the NER and procedures?	 Review MC processes and procedures to check that the MC ensures: Interval energy data is collected from all Type 4A metering installations Interval energy data is collected from all Type 5 installations when the Type 5 accumulation boundary is exceeded 	Clause 7.3.2(h)(2)-(4)						

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								AUSTRALIAN ENERGY MARKET OPERATOR		
	Audit Item		Audit Outcome Compliant Non-Compliant							
		NER /	Compliant	Non	-Comp	oliant				
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
14. Can the MC provide evidence that interval energy data is collected when there is a remote communications failure?	 Review steps that the MC takes to ensure the provision of relevant metering data to MDP if remote acquisition, if any, becomes unavailable 	Clause 7.3.2(h)(5)								
commissioning	 How does the MC ensure that a final read is collected by an appropriately accredited MDP when a meter is removed from a metering installation? If an MP field agent removes and disposes of a metering device, providing a reading to an MDP which is subsequently provided to the market, does the MC ensure that the field agent is performing the data collection under the auspice of the accredited MDPs processes and procedures? 									

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								AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NIED /	Compliant	Non	-Comp	liant		
Question Review Checklist Activity		NER / Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
Check Metering (where a	applicable)	'	'					
16. How does the MC ensure that (where fitted) check metering installations have a mathematical correlation with the metering installation?		Clause 7.8.8(b) Schedule S7.4						
provide evidence that check metering installations are implemented to at least the minimum	to the form of any proposed <i>check</i> metering installations? • Are the accuracy	Schedule S7.4.4(e) Schedule S7.4.4(f)						

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	Audit Item				Audit Outcome Audit Outcome								
	Addit item	I					Addit Odtcome						
		NER /	Compliant	Non	-Comp	oliant							
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response					
Small Customer Metering	g Installations												
18. Can the MC provide evidence that new or replacement metering installations of a small customer meets the minimum services specification?		Clause 7.8.3											
19. Can the MC provide evidence that small customer metering data is verified?		Metrology Procedure Part A,12.5											

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	A . 10. II							AUSTRALIAN ENERGY MARKET OPERATOR		
	Audit Item		Audit Outcome							
		NER /	Compliant	Non	-Comp	liant				
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
20. Can the MC provide evidence that for type 4A metering installations that are not covered by an AEMO exemption, the customer has communicated their refusal for the installation of remote communications at their metering installation?	 Review MCs process and procedure and check: how does the FRMP and/or the MP communicate to the MC that such a refusal has occurred? what information is provided to the MC when this occurs? how is this information stored / managed by the MC? for how long does the MC retain this information? MC to provide total number of customer refusals, this will be provided to AEMO via the Audit report. 									

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								AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NED /	Compliant	Non	-Comp	liant		
Question	Review Checklist Activity	NER / Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
Meter Churn	'		'					
21. Can the MC provide evidence that for connection points where they are the nominated MC a metering installation is installed that is complaint with the NER?	and procedures.to ensure a metering	Clause 7.8.1 and 7.8.2						
22. Can the MC provide evidence that AEMO is provided with the relevant details of the metering installation as specified in Schedule 7.1 within 10 business days?		Clause 7.8.2(e)						

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								AUSTRALIAN ENERGY MARKET OPERATOR			
	Audit Item		Audit Outcome								
		NER /	Compliant	Non	-Comp	liant					
Question	Question Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response			
23. Can the MC provide evidence that the use of Objection Code in MSATS have been used appropriately?	Review MCs objections to ensure they align with requirements of the MSATS procedures										
24. Is there any evidence that the MC commenced Meter Churn prior to being the MC in MSATS?	 Review meter install date against MC start date in MSATS All policy and process, critically including the appropriate use of MSATS CRs, must provide for the establishment of the MC for the market load in MSATS prior to undertaking any Meter Churn 										

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								AUSTRALIAN ENERGY MARKET OPERATOR
	Audit Item						Audit Outcome	
		NER /	Compliant	Non	-Comp	oliant		
Question	Question Review Checklist Activity P	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response
a process to review meter installations that have been reported via the METERERR weekly report?	Systems as a type 5 or 6 meter. • MC's need to investigate the NMI's to ensure the meter installation is correct and take appropriate actions if it is not correct. MC's need to provide a summary of the reasons for the type 5 or 6 meter installations.							
Exemption Manageme								
26. Can the MC provide evidence of	 Review the MC's process for exemptions 	Clause 7.8.10				h. 2020		Dance 20 of 46



								AUSTRALIAN ENERGY MARKET OPERATOR			
	Audit Item		Audit Outcome								
		NER /	Compliant	Non	-Comp	liant					
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response			
where they apply for an exemption from AEMO where a malfunction of the metering installation cannot be rectified within: • 2 business days (type 1, 2 & 3) • 15 business days (small customer metering installation premise) • 10 days (other metering installations)	relating to metering installation malfunctions Review NMI history of exemptions requested and check: has MC applied for the exemption within a reasonable timeframe compared to rectification periods set in the NER? have affected participants been notified? has the metering installation been rectified within the approved exemption timeframe? has a rectification plan been provided to AEMO? has AEMO revoked										
07. O II . MO	any exemptions?										
27. Can the MC provide evidence that for approved		Clause 7.8.10(c)									

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								AUSTRALIAN ENERGY MARKET OPERATOR		
	Audit Item		Audit Outcome							
		NER /	Compliant Non-Compliant			liant				
Question			Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
exemptions a rectification plan has been submitted by its MP to AEMO? Note: if one was not submitted by the MC as part of the original application	in place with MPs to ensure a rectification plan is provided to AEMO									
28. Can the MC provide evidence that for small customer metering installations, where there was no existing public telecommunications network, the MC has sought an exemption and received an approval from AEMO?	process for managing	Clause 7.8.4(a) and 7.8.4(b)								

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								AUSTRALIAN ENERGY MARKET OPERATOR			
	Audit Item			Audit Outcome							
		NER /	Compliant	Non	-Comp	liant					
Question	Question Review Checklist Activity Proce		Y, N or N/A	С	М	Р	Auditor's Comment	Management Response			
29. Can the MC provide evidence for any type 4 to 4A reversions of metering installates been done accordance with NER?	tions to why it was	7.84(d)									

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								AUSTRALIAN ENERGY MARKET OPERATOR		
	Audit Item		Audit Outcome							
		NER /	Compliant	Non	-Comp	oliant				
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
Security of and Acces	ss to Metering Installations	s and Metering	Data	1			'			
30. Can the MC provide evidence that steps are taken to ensure its metering installations are secured against tampering?	 Which items in a metering installation require to be secured? What actions should be taken by the MP in the event that a broken seal is found? How does the MC ensure that this is done? What other security measures if any, are implemented by the MC: a) In the case of wholesale customers in substation environments? b) For retail metering installations? 									

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								AUSTRALIAN ENERGY MARKET OPERATOR				
	Audit Item			Audit Outcome								
		NED /	Compliant	Non	-Comp	liant						
Question	Question Review Checklist Activity NER / Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response					
unrestrained access to metering installations for the purpose of random audits?	 AEMO Audits: Does the MC notify customers whose metering installations have been selected for audit by AEMO (assuming AEMO has provided the required notification)? Does the MC assist in ensuring access is provided to audit staff for such audits? How does the MC provide access to metering installations in substations for its MPs? 											

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								AUSTRALIAN ENERGY MARKET OPERATOR			
	Audit Item		Audit Outcome								
		NER /	Compliant	ant Non-Compliant							
Question			Y, N or N/A	С	М	Р	Auditor's Comment	Management Response			
32. Can the MC provide evidence that the energy data protected from local or remote access by a suitable password and security controls?	 Does the MP provide read only and write passwords for access to the <i>meter</i>? Has the MP forwarded copies of read and write passwords to <i>AEMO</i> for security purposes? Has the MC/MP provided read only passwords to any retail customers if requested? 										
33. Access to energy data recorded by a metering installation	 Which person(s) can the MC permit access to customer metering data? Under what circumstances can the customer or their representatives have access to metering data? 	Clause 7.15.5									

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	Audit Item		Audit Outcome Audit Outcome									
		NED /	Compliant	Non	-Comp	oliant						
Question		NER / Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response				
customer metering installations (whole current)	authorise remote reconnection or disconnection of a small customer from the electricity supply? • Under what conditions can the MC arrange a planned interruption to a customer's supply?											
	Provider (LNSP) Service				ı	1						
35. Can the MC provide evidence that the LNSP has local access to the metering installation or connection point for the purposes of reconnecting or disconnecting of the connection point?	procedures to confirm how does the MC ensure the LNSP has local access	Clause 7.3.2(g)										

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								AUSTRALIAN ENERGY MARKET OPERATOR		
	Audit Item		Audit Outcome							
		NER /	Compliant Non-Compliant			liant				
Question	Review Checklist Activity	Procedure Ref.	Y, N or N/A	С	М	Р	Auditor's Comment	Management Response		
36. How does the MC provide assistance to the LNSP to accommodate the installation of a <i>network device</i> within the <i>metering installation</i> ?	Review if LNSP has requested to install network devices and if so how the MC dealt with this	Clause 7.8.6(d) Metrology Procedure Part A,11.2								
Other Observations										
37. Were there any other observations that the auditor wishes to report on?										

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A.7 MC Audit - Exit Meeting (Register of Attendance / Final Comments)

Date				
Name	Position	Email	Phone	Signature

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Auditor's - Final Comments
MC's Management - Final Comments

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APPENDIX B. MC AUDIT - SUMMARY REPORT

Independent Auditor's summary of audit				

Table B.1: Non-Compliance Summary

Table 211 Hell Compliance Callindary				
Reference Number	Items of Non-Compliance	Non-Compliant C / M / P	Resolved Y / N	