

Compliance plan for Invercargill City Council Distributed Unmetered Load for Trustpower Limited

Title: Deriving Submission Information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 22-Mar-18</p>	<p>The database contains some incorrect and missing information. The field data was 115.1% of the database data for the sample checked, indicating an estimated under submission of 18,856 kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as weak, because the database submissions are based on some inaccurate and missing information.</p> <p>The impact is assessed to be medium.</p> <ul style="list-style-type: none"> The difference between the initial and one month submissions for February 2018 for the four ICPs is approximately 28,325 kWh and has been washed up. I found that the database had under recorded the load by an estimated 4.415 kW for the sample checked during the field audit, which could result in under reporting of an estimated 18,856 kWh per annum. If the whole database has a similar level of accuracy to the sample, the impact is expected to be medium. 	
Actions taken to resolve the issue	Completion date	Remedial action status
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18.	01/05/18	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18	01/05/18	

Title: Location of each item of load			
Non-compliance		Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: unknown To: 22-Mar-18		30 items of load do not have a street address recorded, and one item of load does not have sufficient address information recorded. Two streets had incorrect address information recorded. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as moderate as they are sufficient to ensure that most items of load have address information recorded. The impact is rated as low because 31 ICPs (0.5%) have insufficient address information.	
Actions taken to resolve the issue		Completion date	Remedial action status
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18		01/05/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18		01/05/18	

Title: Description and capacity of load			
Non-compliance		Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 22-Mar-18		The field audit identified 36 lamps which were not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as weak, as they are not sufficient to ensure that most database information is recorded correctly. The impact is rated as low, 89.5% of lamps found were recorded in the database. Most of the wattage difference related to wattage discrepancies, rather than lamp count differences.	

Actions taken to resolve the issue	Completion date	Remedial action status
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18	01/05/18	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18	01/05/18	

Title: Tracking of load changes		
Non-compliance	Description	
<p>Audit Ref: 2.6</p> <p>With: Clause 11(3) of schedule 15.3</p> <p>From: entire audit period</p>	<p>The tracking of load changes is not being carried out in relation to changing of light type on existing items of load.</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	
Medium	<p>The controls are rated as weak, because changes to light type are not being captured for exiting items of load.</p> <p>The impact is assessed to be medium. I found that the database had under recorded the load by an estimated 4.415 kW for the sample checked during the field audit, which could result in under reporting of an estimated 18,856 kWh per annum. If the whole database has a similar level of accuracy to the sample, the impact is expected to be medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18	01/05/18	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18	01/05/18	

Title: Database accuracy			
Non-compliance		Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 22-Mar-18		The database contains some incorrect and missing information. The field data was 115.1% of the database data for the sample checked, indicating an estimated under submission of 18,856 kWh per annum. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating		Rationale for audit risk rating	
Medium		The controls are rated as weak, because they are not sufficient to ensure that lamp details are correct. The impact is assessed to be medium. I found that the database had under recorded the load by an estimated 4.415 kW for the sample checked during the field audit, which could result in under reporting of an estimated 18,856 kWh per annum. If the whole database has a similar level of accuracy to the sample, the impact is expected to be medium.	
Actions taken to resolve the issue		Completion date	Remedial action status
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18		01/05/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18		01/05/18	

Title: Volume information accuracy	
Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: unknown To: 22-Mar-18	The database contains some incorrect and missing information. The field data was 115.1% of the database data for the sample checked, indicating an estimated under submission of 18,856 kWh per annum. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 6

Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as weak, because the database submissions are based on contains some inaccurate and missing information. The impact is assessed to be medium.</p> <ul style="list-style-type: none"> • The difference between the initial and one month submissions for February 2018 for the four ICPs is approximately 28,325 kWh and has been washed up. • I found that the database had under recorded the load by an estimated 4.415 kW for the sample checked during the field audit, which could result in under reporting of an estimated 18,856 kWh per annum. If the whole database has a similar level of accuracy to the sample, the impact is expected to be medium. 		
Actions taken to resolve the issue		Completion date	Remedial action status
TRUS will no longer use the PNET database, instead we will use the RAMM database maintained by ICC from 01/05/18		01/05/18	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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