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

Title: Deriving Submission Information			
Non-compliance	Desc	cription	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	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: Medium Actual impact: Low		
	Audit history: None		
From: unknown	Controls: Weak Breach risk rating: 6		
To: 22-Mar-18 Audit risk rating	Rationale for	audit risk rating	7
Audit risk rating Controls are rated as weak, because the database submissions are based on some inaccurate and missing information. The impact is assessed to be medium. 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 ta	ken 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		cription		
Audit Ref: 2.3 With: Clause 11(2)(b)	30 items of load do not have a street address recorded, and one item of load does not have sufficient address information recorded.			
of Schedule 15.3	Two streets had incorrect address in	formation record	ded.	
	Potential impact: Low			
	Actual impact: Low			
	Audit history: Once previously			
From: unknown	Controls: Moderate	Controls: Moderate		
To: 22-Mar-18	Breach risk rating: 2	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 ta	ken 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	
_		0=7007=0		
use the RAMM databas		Completion date		

Title: Description and o	capacity of load
Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A)	The field audit identified 36 lamps which were not recorded in the database. Potential impact: Low
of Schedule 15.3	Actual impact: Low Audit history: Once previously
From: unknown To: 22-Mar-18	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.

use the RAMM database maintained by ICC from 01/05/18

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	Desc	cription	
Audit Ref: 2.6	The tracking of load changes is not being carried out in relation to changing of light type on existing items of load.		
With: Clause 11(3) of schedule 15.3	Potential impact: High		
	Actual impact: Medium		
From: entire audit	Audit history: None		
period	Controls: Weak		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
The controls are rated as weak, because changes to light type are not being captured for exiting items of load. 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 ta	ken 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	Desc	cription	
Audit Ref: 3.1 With: Clause 15.2 and	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.		
15.37B(b)	Potential impact: Medium		
	Actual impact: Low		
From: unknown	Audit history: None		
To: 22-Mar-18	Controls: Weak		
10. 22-War-18	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak, beca that lamp details are correct. The impact is assessed to be medium recorded the load by an estimated 4 the field audit, which could result in kWh per annum. If the whole databa sample, the impact is expected to be	n. I found that the .415 kW for the under reporting se has a similar	ne database had under sample checked during of an estimated 18,856
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)	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	
From: unknown To: 22-Mar-18	Audit history: None Controls: Weak Breach risk rating: 6	

Audit risk rating	Rationale for audit risk rating		
Medium	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. • The difference between the initial and one month submissions for		
	 The difference between the February 2018 for the four IC has been washed up. I found that the database ha estimated 4.415 kW for the swhich could result in under r per annum. If the whole data the sample, the impact is expenses. 	CPs is approxima d under recorde sample checked reporting of an e abase has a simil	tely 28,325 kWh and d the load by an during the field audit, stimated 18,856 kWh ar level of accuracy to
Actions ta	ken to resolve the issue	Completion date	Remedial action status
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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	