

# Compliance plan for Palmerston North City Council Distributed Unmetered Load for Meridian Energy Limited

Title: Deriving Submission Information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3  From: entire audit period	The database used to prepare submissions contains some inaccurate information. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	Controls are rated as weak, as they do not mitigate the risk of incorrect load types and wattages being recorded.  It is estimated that the wattage differences could result in under reporting of around 2,000,000 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
PNCC has agreed to amend their database so that maximum design wattages are recorded for LED lights. Once this update has occurred we will revise historic submissions as required.	30 September 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will work with PNCC to develop a Code compliant solution for their dimmable LED lighting.	Ongoing	

<b>Title: All load recorded in database</b>			
<b>Non-compliance</b>		<b>Description</b>	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: entire audit period		For the sample of 405 lamps checked: <ul style="list-style-type: none"> <li>• Two lamps recorded in the database were not found</li> <li>• Three lamps were not recorded in the database</li> </ul> Potential impact: Low 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>		Controls are rated as strong, because 99.3% accuracy was achieved for the sample checked.  The impact is low, as the wattage difference would result in under reporting of approximately 1300 kWh per annum.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
We have passed the findings of the field audit to PNCC to verify and correct the database where needed.		30 September 2018	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
Overall controls are rated as strong and are considered sufficient to mitigate risk		Ongoing	

<b>Title: Tracking of Load Changes</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3  From: entire audit period	Database updates may be late for lights in new subdivisions. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2

<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	<p>Controls are rated as moderate, because they are sufficient to ensure that updates are timely most of the time.</p> <p>The impact is low, as PNCC will usually identify recently connected lamps through its outage patrol processes.</p>		
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>	<b>Remedial action status</b>
We will discuss potential process improvements to avoid delays after the material issues regarding database accuracy have been resolved.		30 November 2018	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>	
As above			

<b>Title: Database Accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.1 With: Clause 15.2</p> <p>From: entire audit period</p>	<p>PNCC applies unapproved profiles to adjust specified lamp wattages to account for different drive rates and dimming. 3602 recorded lamp wattages differ from expected values.</p> <p>27 recorded gear wattages differ from expected values.</p> <p>13 recorded lamp and gear models are inconsistent.</p> <p>11 differences were found for the sample of 405 lamps checked during the field audit.</p> <p>Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>High</b>	<p>Controls are rated as weak, as they do not mitigate the risk of incorrect load types and wattages being recorded.</p> <p>It is estimated that the wattage differences could result in under reporting of around 2,000,000 kWh per annum.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
PNCC has agreed to amend their database so that maximum design wattages are recorded for LED lights. Once this update has occurred we will revise historic submissions as required.	30 September 2018	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We will work with PNCC to develop a long term solution for their dimmable LED lighting.	Ongoing	

<b>Title: Volume Information Accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.2 With: Clause 15.2  From: entire audit period	The database used to prepare submissions contains some inaccurate information. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>High</b>	Controls are rated as weak, as they do not mitigate the risk of incorrect load types and wattages being recorded.  It is estimated that the wattage differences could result in under reporting of around 2,000,000 kWh per annum.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
PNCC has agreed to amend their database so that maximum design wattages are recorded for LED lights. Once this update has occurred we will revise historic submissions as required.	30 September 2018	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
We will work with PNCC to develop a Code compliant solution for their dimmable LED lighting.	Ongoing	