

Compliance plan for Gore District Council Distributed Unmetered Load for Meridian Energy 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: 19-Mar-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> • The database accuracy is assessed to be 98.9% indicating an estimated over submission of 875 kWh per annum. • Under submission of 56,804 kWh per annum has occurred due to the exclusion of under verandah lights. The volume of under submission for parks and amenity lighting is unknown. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</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 they are not sufficient to ensure that lamp details are correct and not all load is reconciled.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue	Completion date	Remedial action status	
<p>We will obtain the recently validated list of under verandah lighting from Gore DC and include these volumes in our submissions going forward.</p> <p>We will revise historic submissions to include the under verandah lighting in accordance with the wash up cycle.</p> <p>We are continuing to work with Gore DC to confirm a date by which their database validation and update is likely to be completed including the capture of unmetered parks and amenity lighting.</p>	<p>30 June 2018</p> <p>31 July 2018</p> <p>30 June 2018</p>	<p>Identified</p>	

Preventative actions taken to ensure no further issues will occur	Completion date
Once database validation has been completed we will arrange an audit to confirm accuracy.	01 Dec 2018
Once the accuracy of the database has been confirmed we will arrange monthly reporting to calculate submissions going forward.	TBC
Further revisions of historic submission information will be conducted where more accurate data is available.	TBC

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: 19-Mar-18	18 items of load do not have a street address recorded. Potential impact: Low Actual impact: Low Audit history: Multiple times 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 18 ICPs (1.2%) have missing address information.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are continuing to work with Gore DC to confirm a date by which their database validation and update is likely to be completed including the capture of unmetered parks and amenity lighting.	30 June 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once database validation has been completed we will arrange an audit to confirm accuracy	01 Dec 2018	

Title: All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 19-Mar-18	Park, amenity, and under verandah lights are excluded from the database. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as weak, as they are not sufficient to ensure that park, amenity, and under verandah lights are included in the database. The impact is assessed to be medium. <ul style="list-style-type: none"> • The database accuracy is assessed to be 98.9% indicating an estimated over submission of 875 kWh per annum. • Under submission of 56,804 kWh per annum has occurred due to the exclusion of under verandah lights. The volume of under submission for parks and amenity lighting is unknown. 	
Actions taken to resolve the issue	Completion date	Remedial action status
We will obtain the recently validated list of under verandah lighting from Gore DC and include these volumes in our submissions going forward to reduce market impact. We will revise historic submissions to include the under verandah lighting volumes in accordance with the wash up cycle. We are continuing to work with Gore DC to confirm a date by which their database validation and update is likely to be completed including the capture of unmetered parks and amenity lighting.	30 June 2018 31 July 2018 30 June 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

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.</p> <ul style="list-style-type: none"> • The database accuracy is assessed to be 98.9% indicating an estimated over submission of 875 kWh per annum. • Under submission of 56,804 kWh per annum has occurred due to the exclusion of under verandah lights. The volume of under submission for parks and amenity lighting is unknown. 	
Actions taken to resolve the issue	Completion date	Remedial action status
We are continuing to work with Gore DC to confirm a date by which their database validation and update is likely to be completed so this can be used to calculate submission information.	30 June 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once database validation has been completed we will arrange an audit to confirm accuracy and to confirm processes are in place to track changes.	01 Dec 2018	

Title: Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 23-Feb-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> • The database accuracy is assessed to be 98.9% indicating an estimated over submission of 875 kWh per annum. • Under submission of 56,804 kWh per annum has occurred due to the exclusion of under verandah lights. The volume of under submission for parks and amenity lighting is unknown. <p>Potential impact: Medium</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 they are not sufficient to ensure that lamp details are correct.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We are continuing to work with Gore DC to confirm a date by which their database validation and update is likely to be completed including the capture of unmetered parks and amenity lighting.	30 June 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Title: Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 19-Mar-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> • The database accuracy is assessed to be 98.9% indicating an estimated over submission of 875 kWh per annum. • Under submission of 56,804 kWh per annum has occurred due to the exclusion of under verandah lights. The volume of under submission for parks and amenity lighting is unknown. <p>Potential impact: Medium</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 they are not sufficient to ensure that lamp details are correct.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We will obtain the recently validated list of under verandah lighting from Gore DC and include these volumes in our submissions going forward.</p> <p>We will revise historic submissions to include the under verandah lighting in accordance with the wash up cycle.</p> <p>We are continuing to work with Gore DC to confirm a date by which their database validation and update is likely to be completed including the capture of unmetered parks and amenity lighting.</p>	<p>30 June 2018</p> <p>31 July 2018</p> <p>30 June 2018</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Once database validation has been completed we will arrange an audit to confirm accuracy.</p> <p>Once the accuracy of the database has been confirmed we will arrange monthly reporting to calculate submissions going forward.</p> <p>Further revisions of historic submission information will be conducted where more accurate data is available.</p>	<p>01 Dec 2018</p> <p>TBC</p> <p>TBC</p>	