Compliance plan for Rotorua Lakes DC DUML Audit – 2018

2018			
Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	The database accuracy is assessed to be 97.4% indicating an estimated over submission of 79,600 kWh per annum (excluding ballast) as detailed in section 3.1 .		
301164416 1313	Incorrect profile recorded on the registry for ICP 0001264717UNC3A.		
	Potential impact: High		
	Actual impact: High		
From: entire audit	Audit history: Twice		
period	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale fo	r audit risk rating	
High	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.		
	The impact is assessed to be high, based on the kWh differences described above.		fferences described
Actions taken to resolve the issue		Completion date	Remedial action status
(HHR profile but with the NHH submission flag recorded on the registry)		N/A	Disputed
The 2 emails provided to Veritek between MEEN and Ron Beatty contradict the auditors position that no action has been taken. (page 11)			
For 3 other ICP's, the Registry has allowed it to be updated and after specified numbers of registry changes have been exceeded, it doesn't allow further changes. Mercury should not be penalised for this if it is an issue with a change in the registry. Perhaps this needs to be recorded as an issue.			
Ballast –MEEN will work with RLDC to add the ballast factors in the database. (This has again been captured in 2.4)			
We still don't agree with the non-compliance stated here as it is linked.			
Based on the audit commentary above it doesn't state anywhere about the over submission of 79,000kwh			
In addition, the breach rating of 6 is not reflective of the materiality of the issue.			
Preventative actions taken to ensure no further issues will occur		Completion date	

N/A	N/A	
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ICP identifier and iten	ns of load		
Non-compliance	Description		
Audit Ref: 2.2	2,806 items of load with no ICP recorded.		
With: 11(2)(a) and (aa)	Potential impact: Low		
of Schedule 15.3	Actual impact: None		
	Audit history: Twice		
From: entire audit period	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The control rating is moderate as this is an historic issue and the light owner is recorded for each item of load. The audit risk rating is low as the volumes being submitted per ICP were correct.		
Actions taken to resolve the issue		Completion date	Remedial action status
Mercury is working with the customer to request the ICP is correctly matched to the items of load and ballast factors be added to the database.		June 2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Follow up with customer to see if there are issues with this change and decide on next course of action.		October 2018	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	Ballast is not recorded in the database.		
With: 11(2)(c) and (d)	1 item of load recorded with zero wattage.		
of Schedule 15.3	Potential impact: Low		
	Actual impact: None		
From: entire audit period	Audit history: None		
	Controls: Strong		
	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as the correct ballasts are applied in the monthly wattage report but are not recorded in RAMM as is required by this clause.		
	The audit risk rating is low as the correct ballasts are being applied and therefore reconciliation is accurate.		
Actions taken to resolve the issue		Completion date	Remedial action status
MEEN will work with RLDC to ensure all the changes are captured and recorded into the database are complete and accurate.		July 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
MEEN is documenting a consistent process for all DUMLS to increase compliance.		June 19	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and	The database accuracy is assessed to be 97.4% indicating an estimated over submission of 79,600 kWh per annum (excluding ballast).		
15.37B(b)	The database is not complete as ballasts are not recorded in the RAMM database.		
	Potential impact: High		
	Actual impact: High		
From: entire audit	Audit history: None		
period	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time. The impact is assessed to be high, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
MEEN will work with RLDC to ensure all the changes are captured and recorded into the database are complete and accurate.		October 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
MEEN is documenting a consistent process for all DUMLS to increase compliance.		June 2019	

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and	The database accuracy is assessed to be 97.4% indicating an estimated over submission of 79,600 kWh per annum (excluding ballast).		
15.37B(c)	Incorrect profile recorded on the registry for ICP 0001264717UNC3A.		
	Some of the load not recorded against the correct NSP.		
	Potential impact: High		
	Actual impact: Unknown		
	Audit history: Twice		
From: entire audit Controls: Moderate			
period	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, because the database management and submission calculation controls will mitigate risk most of the time. The impact is assessed to be high, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
MEEN will work with the network and RLDC to capture and submit information at NSP level		October 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
MEEN is documenting a consistent process for all DUMLS to increase compliance.		2019	