Compliance plan for Marlborough DC, NZTA & Port – 2018

Deriving Submission Information			
Non-compliance	Description		
Audit Ref: 2.1	Accuracy ratio is 93.9% indicating over submission of 136,100 kWh per annum.		
With: 11(1) of schedule 15.3	1,049 items of load with the incorrect ballast applied indicating over submission of 17,923.25 kWh per annum.		
	Combined estimated over submission of 1	54,023.25kWh over	submitted per annum.
From: entire audit period	Potential impact: High		
	Actual impact: High		
	Audit history: None		
	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	Controls are rated as weak due to the variances found from the field audit and the incorrect ballasts used for submission.		
	The audit risk rating is high due to the volume of over submission occurring.		sion occurring.
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will request that the data supplied be updated to reflect the correct ballasts.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will validate the ballasts as best as possible, Genesis will advise database administrator of any corrections required.		10/2018	

ICP Identifier			
Non-compliance	Description		
Audit Ref: 2.2	ICPs not recorded against each item of load.		
With: 11(2)(a) of Schedule	Potential impact: Low		
15.3	Actual impact: None		
	Audit history: None		
From: entire audit period	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate and the audit risk rating is low, as there is only one NSP and only one ICP per customer and the light owner is recorded against each item of load.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have requested that each item of load within the database have an ICP accurately assigned based on nsp.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will advise of any missing information found in the information delivered.		10/2018	

Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3	490 items of load not locatable.		
With: 11(2)(b) of Schedule	Potential impact: Low		
15.3	Actual impact: None		
	Audit history: None		
From: entire audit period	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as the vicinity details are still retrievable in the previous WASP system for these historic items of load.		
	The audit risk rating is low, as this affects only 1% of the total database and is an historic issue.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have requested that each item of load within the database have an ICP accurately assigned based on nsp.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will advise of any missing information found in the information delivered.		10/2018	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	Two lights found in the field not recorded in the database.		
With: 11(2A) of Schedule	Potential impact: Low		
15.3	Actual impact: Low		
	Audit history: None		
From: entire audit period	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as the tracking of load changes will mitigate risk most of the time, but the field audit found that there is room for errors to occur.		
	The audit risk rating is low, as there were only two lights out of a sample of 306 or 0.006% of the sample checked found to be missing from the database.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have requested that each item of load within the database have an ICP accurately assigned based on nsp.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will advise of any missing information found in the information delivered.		10/2018	

Tracking of load change			
Non-compliance	Description		
Audit Ref: 2.6	Festive lighting recorded as connected all year.		
With: 11(3) of Schedule	Potential impact: Low		
15.3	Actual impact: Low		
	Audit history: None		
From: entire audit period	Controls: Weak		
	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as the festive lighting is not recorded correctly and there is no process to manage this in the database.		
	The audit risk rating is low, as the volume of lights connected throughout the year is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have requested that each item of load within the database be tracked appropriately.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will advise where possible of any potential issue, however we rely on contacted and any 3 rd parties to ensure changes are accurately noted.		10/2018	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	Accuracy ratio is 93.9% indicating over submission of 136,100 kWh per annum.		
With: 15.2 & 15.37(b)	1,049 items of load with the incorrect ballast applied indicating over submission of 17,923.25 kWh per annum.		
From: entire audit period	Combined estimated over submission of 1	54,023.25kWh over	submitted per annum.
Trom one dade ponda	Potential impact: High		
	Actual impact: High		
	Audit history: None		
	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	Controls are rated as weak due to the variances found from the field audit and the incorrect ballasts used for submission.		
	The audit risk rating is high due to the volume of over submission occurring.		sion occurring.
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will request that the data supplied be updated to reflect the correct ballasts.		10/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will validate the ballasts as best as possible, Genesis will advise database administrator of any corrections required.		10/2018	

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2	Accuracy ratio is 93.9% indicating over submission of 136,100 kWh per annum.			
With: Clause 15.2 & 15.37(c)	1,049 items of load with the incorrect ballast applied indicating over submission of 17,923.25 kWh per annum.			
	Combined estimated over submission of 1	54,023.25kWh over	submitted per annum.	
From: entire audit period	Potential impact: High			
	Actual impact: High			
	Audit history: None			
	Controls: Weak	Controls: Weak		
	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	Controls are rated as weak due to the variances found from the field audit and the incorrect ballasts used for submission.			
	The audit risk rating is high due to the volume of over submission occurring.		sion occurring.	
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis have requested that each item of load within the database have an ICP accurately assigned based on nsp.		10/2018	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will advise of any missing information found in the information delivered.		10/2018		