

Compliance plan for MERC managed Auckland DUML Audit 2018

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: 11(1) of Schedule 15.3 From: 01-Jun-17 To: 31-May-18	The field audit found variances and two ICPs that appear to have load but are decommissioned in the registry resulting in an estimated under submission of 54,206.16 kWh per annum. One example of volume being truncated rather than rounded. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak as the field audit found variances between the spreadsheets for all but one customer. 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
For the ICP's decommissioned Mercury believes the database reflects this accurately. Excluding the decommissioned sites Mercury will look to update the data bases based upon this field audit.	June 2018	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Mercury will look to develop a DUML process to ensure consistent treatment of DUML databases	May 2019	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: 11(2)(b) From: 01-Jun-17 To: 31-May-18	19 items of load for Acacia Cove with no location details recorded. Potential impact: None Actual impact: None Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls in place mitigate risk most of the time. The items of load associated with these ICPs have a low rate of change. The number of items of load is small therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Mercury is working with the building manager to obtain location details.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implementation of consistent DUML procedures via improved documentation	June 2019	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3 From: 01-Jun-17 To: 31-May-18	Nulite spreadsheet has no lamp descriptions recorded. 7 items of load in Acacia Cove have no lamp wattages recorded. Potential impact: Low Actual impact: Unknown Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as the missing details relate only to Nulite and these are historic and affect a small volume of load, and the 7 items of load for Acacia Cove are under investigation. The risk rating is assessed as low as the volume of items of load is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Working with the customers to confirm database accuracy.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Implementation of a DUML procedure	June 2019	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 01-Jun-17 To: 31-May-18	48 additional items of load found in the field than recorded in the spreadsheets. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	The controls are weak as the inaccuracies found indicate that the database load has not been captured correctly in all instances. The impact is assessed to be high, based on the kWh differences associated with these variances.	
Actions taken to resolve the issue	Completion date	Remedial action status
With the exception of the decommissioned sites and the incorrect information provided by Veritek last year and has been referred back, Mercury will update the databases based upon the information contained in the audit.	June 2018	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
As previously indicated, DUML procedures to be documented.	June 2019	

Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.6 With: 11(3) of Schedule 15.3 From: 01-Jun-17 To: 31-May-18	Tracking of load change not captured correctly for Acacia Cove. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate as the controls to manage load changes will mitigate risk most of the time. The audit risk rating is low due to the small volume of load associated.	
Actions taken to resolve the issue	Completion date	Remedial action status
Same as 2.4. Working with the customer to confirm accuracy and will raise an IT ticket to ensure flow through to submissions.	October 2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
DUML procedure to be developed	Not provided	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: 15.2 and 15.37B(b) From: 01-Jun-17 To: 31-May-18	The field audit found variances and two ICPs that appear to have load but are decommissioned in the registry resulting in an estimated under submission of 49,723.38 kWh per annum. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak as the field audit found variances between the spreadsheets for all but one customer. 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
Mercury disputes the 2 decommissioned ICP's Mercury will update the database and systems based on this audit and work with the site managers to clarify discrepancies.	October 2018	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
DUML procedures to be documented.	June 2019	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: 15.2 and 15.37B(c) From: 01-Jun-17 To: 31-May-18	The field audit found variances and two ICPs that appear to have load but are decommissioned in the registry. Two ICPs have the incorrect daily kWh figure resulting in under submission. This is resulting in an estimated under submission of 54,206.16 kWh per annum. One example of volume being truncated rather than rounded. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating:	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak as the field audit found variances and the incorrect daily kWh figure used for two ICPs in SAP. 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
Mercury disputes that the 2 ICP's are not decommissioned. Variances will be corrected based on this audit and will flow through to submissions.	June 2018	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
DUML procedures to be documented.	June 2019	