

Compliance plan for Tararua District Council Distributed Unmetered Load for Contact Energy Limited

Title: Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: unknown To: 08-May-18	The database used to prepare submissions is out of date. Potential impact: Medium Actual impact: Unknown Audit history: Twice previously Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as weak overall. The database used to calculate submissions was out of date. Based on review of the current database in section 3.1 , it appears likely that the May 2017 database version used for submission also contained some inaccurate information. The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Personnel changes at Tararua Alliance has resulted in infrequent provision of DUML values. When comparing the May 2017 database to the May 2018 database output (adjusted for ICPs numbers and correct ballast values) the difference between the two database extracts is 2.828 KW of connected load. Report Tararua Alliance have committed to monthly provisions of a database extract. Tararua Alliance have also committed to ensuring all ICP, ballast value and LED upgrades are updated within the database on Tararua DC's behalf during May 2018. Once this has been completed Contact will review the database accuracy again against the field audit results.	July 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Title: ICP identifier and items of load		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 08-May-18</p>	<p>ICP number is not recorded for 208 items of load.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate overall, as they are sufficient to ensure that most items of load have an ICP number recorded. Controls over recording of ICP numbers for NZTA ICPs are weak.</p> <p>38,468 watts are recorded in the database for items of load with no ICP number. Based on this, the potential impact is high.</p> <p>The actual impact is low, because Contact's submissions are based on May 2017 data and Contact has recorded ICP numbers for each item of load.</p> <p>Most of the lights with missing ICP numbers are owned by NZTA.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Personnel changes at Tararua Alliance has resulted in infrequent provision of DUMML values.</p> <p>Tararua Alliance have also committed to ensuring all ICP, ballast value and LED upgrades are updated within the database on Tararua DC's behalf during May 2018. Once this has been completed Contact will review the database accuracy again against the field audit results.</p>	July 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Title: Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 08-May-18</p>	<p>Six items of load do not have complete and accurate description and load information recorded.</p> <p>168 items of load are expected to have a gear wattage recorded, but the gear wattage is blank.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</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 wattage and gear information is consistently recorded.</p> <p>The potential impact is medium based on wattage differences of at least 2,915 W or approximately 12,449 kWh per annum.</p> <p>Contact's submissions are based on May 2017 data, and Contact has recorded lamp and gear wattages each item of load based on the lamp makes and models recorded. Because of the LED upgrade, it is likely that some of the lamp makes and models recorded were incorrect. I estimate the impact will be medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Tararua Alliance on behalf of Tararua DC have committed to updating the database with correct wattage values and descriptions during May 2018.</p> <p>Once this has been completed Contact will review the database accuracy again against the field audit results.</p>	July 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Title: All load recorded in database			
Non-compliance		Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 04-May-18		Eight lamps were not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as weak as they are not sufficient to ensure that all lights, are recorded in the database. The impact is unknown but is rated as low, as eight lights were missing from the database.	
Actions taken to resolve the issue		Completion date	Remedial action status
Tararua Alliance on behalf of Tararua DC have committed to updating the database with correct wattage values and descriptions during May 2018. Once this has been completed Contact will review the database accuracy again against the field audit results.		July 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
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: unknown To: 08-May-18	Updates to the database can be delayed. Potential impact: Medium Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3

Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls are rated as weak, as they are not sufficient to ensure that the database is kept up to date where invoicing is not timely.</p> <p>The impact is low, because the current database is not used for reconciliation submissions. If the database was used, the potential impact during the LED upgrade period is estimated to be medium.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Tararua Alliance on behalf of Tararua DC have committed to updating the database with correct wattage values and descriptions during May 2018.</p> <p>Tararua DC is keen to see the benefit of lower consuming LED lights in their power costs so there is incentive to ensure regular updates of the database is undertaken</p>		July 2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

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: 08-May-18</p>	<p>The database contains some incorrect and missing information.</p> <ul style="list-style-type: none"> Database accuracy is assessed to be 69.5% indicating over recording of approximately 13,586 kWh per annum. 208 items of load have no ICP number recorded. 38,468 watts or approximately 164,296 kWh are recorded in the database for items of load with no ICP number. Six items of load do not have complete and accurate description and load information recorded, and the wattage is unknown. A further 168 items of load are expected to have a gear wattage recorded, but the gear wattage is blank. <u>THE EXPECTED GEAR WATTAGE FOR THESE ITEMS IS 2,915 WATTS</u> or approximately 12,450 kWh per annum. 539 items have incorrect gear wattages recorded. The difference is 7761 watts or approximately 33,147 kWh per annum over recorded in the database. <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 they are not sufficient to ensure that the database is correct.</p> <p>The potential impact is assessed to be high, based on the kWh differences described above. The actual impact is assessed to be medium because</p> <ul style="list-style-type: none"> • The May 2017 database used to calculate submissions was out of date. Based on review of the current database in section 3.1, it appears likely that the May 2017 database version used for submission also contained some inaccurate information. • The impact is reduced because Contact adjusted the May 2017 database information to include missing ICP numbers and correct wattages. 		
Actions taken to resolve the issue		Completion date	Remedial action status
Tararua Alliance have committed to ensuring all ICP, ballast value and LED upgrades are updated within the database on Tararua DC's behalf during May 2018. Once this has been completed Contact will review the database accuracy again against the field audit results.		July 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: 08-May-18</p>	<p>The database used to prepare submissions is out of date.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice 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 overall. The database used to calculate submissions was out of date. Based on review of the current database in section 3.1, it appears likely that the May 2017 database version used for submission also contained some inaccurate information.</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>Tararua Alliance have committed to ensuring all ICP, ballast value and LED upgrades are updated within the database on Tararua DC's behalf during May 2018. Once this has been completed Contact will review the database accuracy again against the field audit results.</p> <p>Tararua DC is keen to see the benefit of lower consuming LED lights in their power costs so there is incentive to ensure regular updates of the database is undertaken</p>	July 2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	