

Compliance plan for Wellington City Council Distributed Unmetered Load for Contact 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: 06-Apr-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 90.2% indicating an estimated over submission of 12,997 kWh per annum. • Five festive lights have incorrect wattages recorded. The errors amount to 2,161 watts, resulting in under submission of approximately 800 kWh over the Christmas period. • Some variable dimming takes place and the database records the full wattage. The impact of this is unknown. • 268 lamps have incorrect ballast wattage recorded. The errors amount to 614 watts, resulting in over submission of 2,622 kWh per annum. • Some lamps have missing make, model and wattage information. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</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
Wellington CC is undertaking and extensive LED roll out program and Contact is working with them to ensure their DUML database is accurately populated in a timely manner as part of this roll out. A full review of streetlight details is expected to be conducted once the LED roll out is completed	Dec 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	
Audit Ref: 2.4 With: Clauses 11(2)(c) and (d) of Schedule 15.3 From: unknown To: 13-Mar-18	Some description and capacity information is incomplete or unknown, including: <ul style="list-style-type: none"> • 85 gear wattages • 96 gear wattage models and descriptions • 28 lamp wattages • 24 lamp models and descriptions. Potential impact: Low Actual impact: Low Audit history: Once 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 mitigate the risk of incomplete or inaccurate information being recorded. The impact is unable to be accurately assessed, because the correct lamp information is unavailable. It is estimated to be low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Wellington CC is undertaking and extensive LED roll out program and Contact is working with them to ensure their DUMML database is accurately populated in a timely manner as part of this roll out. A full review of streetlight details is expected to be conducted once the LED roll out is completed	Dec 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: 02-Apr-18	The field audit identified four lamps which were not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate, as they are sufficient to ensure that most database information is recorded correctly.</p> <p>The impact is rated as low, 99% of lamps were recorded in the database for the sample checked.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The field audit is reflective of a large urban council undergoing an extensive LED roll out.</p> <p>Contact is working with them to ensure their DUML database is accurately populated in a timely manner as part of this roll out. A full review of streetlight details is expected to be conducted once the LED roll out is completed</p>		Dec 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: unknown</p> <p>To: 13-Mar-18</p>	<p>Database updates may be late for new subdivisions.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate, because they are sufficient to ensure that updates are timely most of the time.</p> <p>The impact is low, as WCC will usually identify recently connected lamps through outage patrols or when the "as built" plan is provided.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Contact will continue to work with Wellington CC to refine their processes around management of new subdivision streetlight population into their RAMM in light of their desire to have all LED streetlights managed by their central management system.</p>		Date	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: 02-Apr-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 90.2% indicating an estimated over submission of 12,997 kWh per annum. Five festive lights have incorrect wattages recorded. The errors amount to 2,161 watts, resulting in under submission of approximately 800 kWh over the Christmas period. Some variable dimming takes place and the database records the full wattage. The impact of this is unknown. 268 lamps have incorrect ballast wattage recorded. The errors amount to 614 watts, resulting in over submission of 2,622 kWh per annum. Some lamps have missing make, model and wattage information. <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</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
Wellington CC is undertaking an extensive LED roll out program and Contact is working with them to ensure their DUML database is accurately populated in a timely manner as part of this roll out. A full review of streetlight details is expected to be conducted once the LED roll out is completed	Dec 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: Clauses 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 06-Apr-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 90.2% indicating an estimated over submission of 12,997 kWh per annum. • Five festive lights have incorrect wattages recorded. The errors amount to 2,161 watts, resulting in under submission of approximately 800 kWh over the Christmas period. • Some variable dimming takes place and the database records the full wattage. The impact of this is unknown. • 268 lamps have incorrect ballast wattage recorded. The errors amount to 614 watts, resulting in over submission of 2,622 kWh per annum. • Some lamps have missing make, model and wattage information. <p>Incorrect profiles are recorded on the registry for seven ICs.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above. Profiles were recorded correctly on the registry for most of the audit period.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Wellington CC is undertaking and extensive LED roll out program and Contact is working with them to ensure their DUML database is accurately populated in a timely manner as part of this roll out. A full review of streetlight details is expected to be conducted once the LED roll out is completed</p> <p>The incorrect profile on the registry issue is a result of a system defect – currently a fix is underway to prevent this issue from occurring. A manual work around is currently in place to update the registry where required</p>	<p>Dec 2018</p> <p>July 2018</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

