Compliance plan for Waimea Village DUML Audit

| Deriving Submission Information | | | | |
|---|--|-----------------------|------------------------|--|
| Non-compliance | Description | | | |
| Audit Ref: 2.1 | No database in place. | | | |
| With: 11(1) of Schedule | Potential impact: Low | | | |
| 15.3 | Actual impact: Low | | | |
| | Audit history: None | | | |
| Francisco Para e a Plana de L | Controls: Weak | | | |
| From: entire audit period | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale fo | or audit risk rating | | |
| Low | Controls are rated as weak, as there is no | database. | | |
| | The volume of lights is low therefore the in | npact on reconciliati | on is low. | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| While the distributor has an accurate representation of the DUML load at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified | |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy | | | | |
| Preventative actions take | n to ensure no further issues will occur | Completion date | | |
| | | | | |

| ICP Identifier | | | | |
|---|--|--|------------------------|--|
| Non-compliance | Description | | | |
| Audit Ref: 2.2 | No database in place. | | | |
| With: 11(2)(a) of Schedule | Potential impact: Low | | | |
| 15.3 | Actual impact: Low | | | |
| | Audit history: None | | | |
| | Controls: Weak | | | |
| From: entire audit period | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale fo | r audit risk rating | | |
| Low | Controls are rated as weak, as there is no | database. | | |
| | The volume of lights is low therefore the in | The volume of lights is low therefore the impact on reconciliation is low. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| While the distributor has an accurate representation of the DUML load at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified | |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy | | | | |
| Preventative actions taker | n to ensure no further issues will occur | Completion date | | |
| | | | | |

| Location of Each Item of Load | | | |
|--|--|--|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 2.3 | No database in place. | | |
| With: 11(2)(b) of Schedule | Potential impact: Low | | |
| 15.3 | Actual impact: Low | | |
| | Audit history: None | | |
| | Controls: Weak | | |
| From: entire audit period | Breach risk rating: 3 | | |
| Audit risk rating | Rationale fo | r audit risk rating | |
| Low | Controls are rated as weak, as there is no database. | | |
| | The volume of lights is low therefore the in | The volume of lights is low therefore the impact on reconciliation is low. | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| While the distributor has an accurate representation of the DUML load including schematics identifying where each light is located at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

| Description of Load Type | | | |
|--|--|-----------------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 2.4 | No database in place. | | |
| With: 11(2)(c)&(d) of | Potential impact: Low | | |
| Schedule 15.3 | Actual impact: Low | | |
| | Audit history: None | | |
| | Controls: Weak | | |
| From: entire audit period | Breach risk rating: 3 | | |
| Audit risk rating | Rationale fo | r audit risk rating | |
| Low | Controls are rated as weak, as there is no | database. | |
| | The volume of lights is low therefore the in | npact on reconciliati | on is low. |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| While the distributor has an accurate representation of the DUML load including schematics identifying where each light is located at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

| All load recorded in database | | | |
|--|--|---------------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 2.5 | No database in place. | | |
| With: 11(2A) of Schedule | Potential impact: Low | | |
| 15.3 | Actual impact: Low | | |
| | Audit history: None | | |
| Francisco Para esta Para esta d | Controls: Weak | | |
| From: entire audit period | Breach risk rating: 3 | | |
| Audit risk rating | Rationale fo | r audit risk rating | |
| Low | Controls are rated as weak, as there is no database. | | |
| | The volume of lights is low therefore the impact on reconciliation is low. | | on is low. |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| While the distributor has an accurate representation of the DUML load including schematics identifying where each light is located at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy | | | |
| Preventative actions taker | n to ensure no further issues will occur | Completion date | |
| | | | |

| Tracking of Load Change | | | | |
|--|--|-----------------------|------------------------|--|
| Non-compliance | Description | | | |
| Audit Ref: 2.6 | No database in place. | | | |
| With: 11(3) of Schedule | Potential impact: Low | | | |
| 15.3 | Actual impact: Low | | | |
| | Audit history: None | | | |
| | Controls: Weak | | | |
| From: entire audit period | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale fo | r audit risk rating | | |
| Low | Controls are rated as weak, as there is no | database. | | |
| | The volume of lights is low therefore the in | npact on reconciliati | on is low. | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| While the distributor has an accurate representation of the DUML load including schematics identifying where each light is located at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified | |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy. | | | | |
| The streetlight load is quite static resulting in a very small number of changes of the previous lifetime of this site. | | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | | |
| | | | | |

| Audit Trail | | | |
|--|--|-----------------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 2.7 | No database in place. | | |
| With: 11(4) of Schedule | Potential impact: Low | | |
| 15.3 | Actual impact: Low | | |
| | Audit history: None | | |
| | Controls: Weak | | |
| From: entire audit period | Breach risk rating: 3 | | |
| Audit risk rating | Rationale fo | r audit risk rating | |
| Low | Controls are rated as weak, as there is no | database. | |
| | The volume of lights is low therefore the in | npact on reconciliati | on is low. |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| While the distributor has an accurate representation of the DUML load including schematics identifying where each light is located at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy. | | | |
| The streetlight load is quite static resulting in a very small number of changes of the previous lifetime of this site. | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |

| Database Accuracy | | | | |
|--|--|-----------------------|------------------------|--|
| Non-compliance | Description | | | |
| Audit Ref: 3.1 | No database in place. | | | |
| With: 15.2 & 15.37B(b) | Potential impact: Low | | | |
| | Actual impact: Low | | | |
| | Audit history: None | | | |
| From: entire audit period | Controls: Weak | | | |
| | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale fo | or audit risk rating | | |
| Low | Controls are rated as weak, as there is no | database. | | |
| | The volume of lights is low therefore the in | npact on reconciliati | on is low. | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| While the distributor has an accurate representation of the DUML load including schematics identifying where each light is located at this ICP we appreciate their concerns at being considered a DUML database owner for what is considered private lights. | | July 2018 | Identified | |
| Contact has initiated an exercise to develop a DUML database in conjunction with Waimea Village | | | | |
| We do not believe the absence of a formal DUML database has resulted in any material submission inaccuracy. | | | | |
| The streetlight load is quite static resulting in a very small number of changes of the previous lifetime of this site. | | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | | |
| | | | | |

| Volume Information Accuracy | | | |
|--|--|--------------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 3.2 With: 15.2 & 15.37B(c) | Light volume discrepancy and therefore an estimated over submission of 1,981 kWh per annum. | | |
| | Potential impact: Low Actual impact: Low | | |
| From: entire audit period | Audit history: None Controls: Weak | | |
| Audit risk rating | Breach risk rating: 3 Rationale for audit risk rating | | |
| Low | Controls are rated as weak, as this is not managed via a database and the field audit found a different number of lights than being submitted for. | | |
| | The volume of lights is low therefore the impact on reconciliation is low. | | on is low. |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| As part of developing a formal DUML database we will confirm with the customer the correct number and type of lights | | July 2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| | | | |