# ELECTRICITY INDUSTRY PARTICIPATION CODE
# DISTRIBUTED UNMETERED LOAD AUDIT REPORT

For

# HUTT CITY COUNCIL AND CONTACT ENERGY

Prepared by: Tara Gannon

Date audit commenced: 3 April 2018

Date audit report completed: 30 April 2018

Audit report due date: 01 June 2018

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## EXECUTIVE SUMMARY

This audit of the Hutt City Council (HCC) DUML database and processes was conducted at the request of Contact Energy (Contact) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1, which became effective on 1 June 2017.

The RAMM database used for submission is managed by HCC. New connection, fault and maintenance work is completed by Fulton Hogan. Fulton Hogan update the database using Pocket RAMM. HCC provide a monthly report to Contact from the database.

The future risk rating of eight indicates that the next audit be completed in 18 months. Four non-compliances were identified, and one recommendation was raised. The matters raised are detailed below:

## AUDIT SUMMARY

### NON-COMPLIANCES

| Subject | Section | Clause | Non-Compliance | Controls | Audit Risk Rating | Breach Risk Rating | Remedial Action |
|---|---|---|---|---|---|---|---|
| Deriving submission information | 2.1 | 11(1) of Schedule 15.3 | The database used to prepare submissions contains some inaccurate information. | Moderate | Low | 2 | Identified |
| Description and capacity of load | 2.4 | 11(2)(c) and (d) of Schedule 15.3 | Six lights connected to HCC ICPs do not have make and model information recorded. | Moderate | Low | 2 | Identified |
| Database accuracy | 3.1 | 15.2 and 15.37B(b) | The database used to prepare submissions contains some inaccurate information. | Moderate | Low | 2 | Identified |
| Volume information accuracy | 3.2 | 15.2 and 15.37B(c) | The database used to prepare submissions contains some inaccurate information.<br>Incorrect profiles are recorded on the registry. | Moderate | Low | 2 | Identified |
| Future Risk Rating | | | | | | 8 | |

| **Future risk rating** | 1-3 | 4-6 | 7-8 | 9-17 | 18-26 | 27+ |
|---|---|---|---|---|---|---|
| **Indicative audit frequency** | 36 months | 24 months | 18 months | 12 months | 6 months | 3 months |

## RECOMMENDATIONS

| Subject | Section | Description | Recommendation |
|---|---|---|---|
| Database accuracy | 3.1 | Database accuracy | Confirm and record correct wattages for Christmas lights. |

## ISSUES

| Subject | Section | Description | Issue |
|---|---|---|---|
| | | Nil | |

# 1. ADMINISTRATIVE

## 1.1. Exemptions from Obligations to Comply with Code

### Code reference

*Section 11 of Electricity Industry Act 2010.*

### Code related audit information

*Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.*

### Audit observation

The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

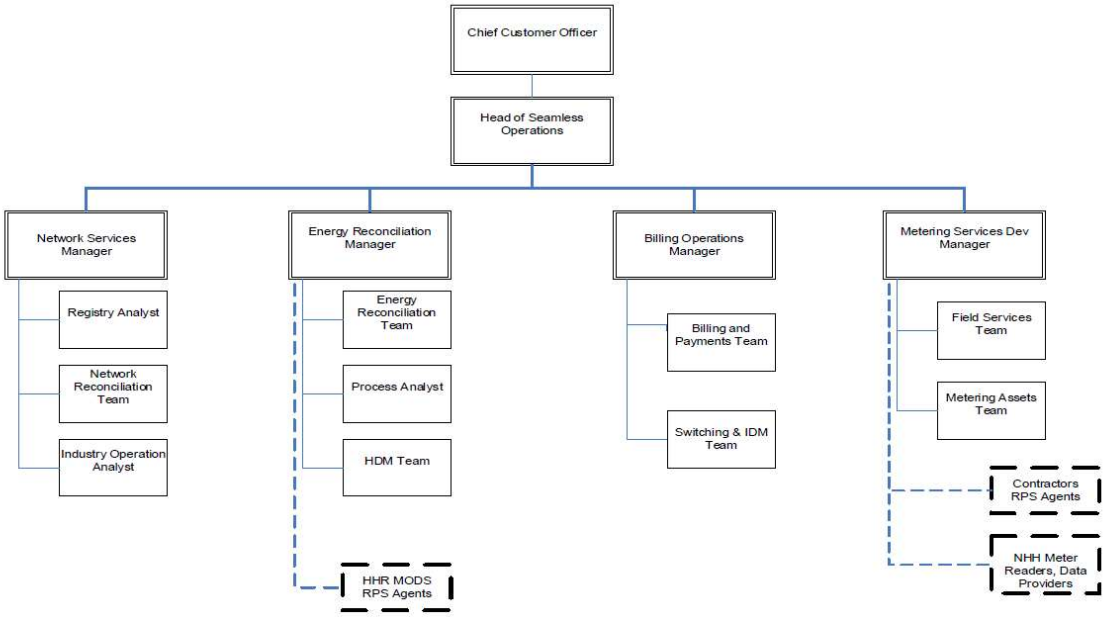
### Audit commentary

There is one exemption in place relevant to the scope of this audit:

**Exemption No. 177:** Exemption to clause 8(g) of schedule 15.3 of the Electricity Industry Participation Code 2010 ("Code") in respect of providing half-hour ("HHR") submission information instead of non half-hour ("NHH") submission information for distributed unmetered load ("DUML"). This exemption expires at the close of 31 October 2023.

## 1.2. Structure of Organisation

Contact Energy provided a copy of their organisational structure.



## 1.3. Persons involved in this audit

Auditor:

**Tara Gannon**

**Veritek Limited**

**Electricity Authority Approved Auditor**

Other personnel assisting in this audit were:

| Name | Title | Company |
|---|---|---|
| Zackary Moodie | Traffic Engineer Network Operations | Hutt City Council |
| Nigel Parkin | Contracts Officer | Hutt City Council |
| Bernie Cross | Energy Reconciliation Manager | Contact Energy |

## 1.4. Hardware and Software

The SQL database used for the management of DUML is remotely hosted by RAMM Software Ltd. The database is commonly known as "RAMM" which stands for "Roading Asset and Maintenance Management". The specific module used for DUML is called RAMM Contractor.

HCC confirmed that the database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

## 1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

## 1.6. ICP Data

| ICP Number | Description | NSP | Number of items of load | Database wattage (watts) |
|---|---|---|---|---|
| 0001256864UN8C4 | SHP1 HUTT ROAD | GFD0331 | 5,106 | 503,194 |
| 0001256868UNBDA | MASTER STL ICP HCC HAY0111 | HAY0111 | 1,616 | 136,525 |
| 0001255305UNA9F | SL LH | MLG0111 | 2,781 | 283,100 |
| 0001256863UN50E | SHP17 HUTT ROAD | MLG0331 | 4,988 | 473,581 |
| | | **Total** | **14,491** | **1,396,400** |

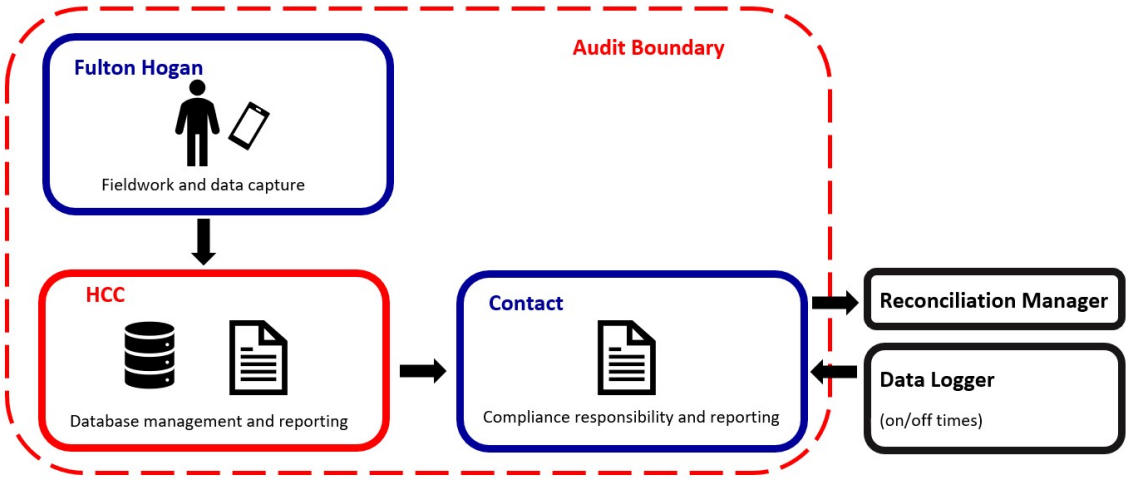
## 1.7. Authorisation Received

All information was provided directly by Contact and HCC.

## 1.8. Scope of Audit

The RAMM database used for submission is managed by HCC. New connection, fault and maintenance work is completed by Fulton Hogan. Fulton Hogan update the database using Pocket RAMM. HCC provide a monthly report to Contact from the database.

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting. The diagram below shows the audit boundary for clarity.




The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

The field audit was undertaken of a statistical sample of 458 items of load on 18 April 2018. The total population was divided into two strata:

- new subdivision at Parklands in Wainuiomata and surrounding streets; and
- all other streets.

## 1.9. Summary of previous audit

This is the first audit of HCC's DUML database completed by Veritek.

## 1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

**Code reference**

*Clause 16A.26 and 17.295F*

**Code related audit information**

*Retailers must ensure that DUML database audits are completed:*

1. *by 1 June 2018 (for DUML that existed prior to 1 June 2017)*
2. *within three months of submission to the reconciliation manager (for new DUML)*
3. *within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.*

### Audit observation

Contact have requested Veritek to undertake this streetlight audit.

### Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database within the required timeframe.  Compliance is confirmed.

## 2. DUML DATABASE REQUIREMENTS

### 2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

**Code reference**

*Clause 11(1) of Schedule 15.3*

**Code related audit information**

*The retailer must ensure the:*

- *DUML database is up to date*
- *methodology for deriving submission information complies with Schedule 15.5.*

**Audit observation**

The process for calculation of consumption was examined.

**Audit commentary**

Contact reconciles this DUML load using the HHR profile, in accordance with exemption number 177. This exemption is discussed further in **section 1.1**.

Submissions are based on the database information, with on and off times derived from data logger information.

I recalculated the submissions for February 2018 for ICPs all four ICPs using the data logger and database information. I confirmed that the calculation method was correct. Festive lights were correctly excluded from the calculation because they were not connected in that submission period.

There is some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance and discussed in **section 3.1**.

**Audit outcome**

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 2.1<br>With: Clause 11(1) of Schedule 15.3<br><br>From: unknown<br>To: 18-Apr-18 | The database used to prepare submissions contains some inaccurate information.<br>• The database accuracy is assessed to be 99.9% indicating an estimated over submission of 175 kWh per annum.<br>• 66 lamps have incorrect ballast wattage recorded. The errors amount to 790 watts, resulting in over submission of 3,374 kWh per annum.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2 |

| Audit risk rating | Rationale for audit risk rating |
|---|---|
| **Low** | The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.<br>The impact is assessed to be low, based on the kWh differences described above. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Contact will work with Hutt CC to get the DUML database updated with these correct values | Dec 2018 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| As above | As above | |

### 2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

**Code reference**

*Clause 11(2)(a) and (aa) of Schedule 15.3*

**Code related audit information**

*The DUML database must contain:*

- *each ICP identifier for which the retailer is responsible for the DUML*
- *the items of load associated with the ICP identifier.*

**Audit observation**

The database was checked to confirm an ICP is recorded for each item of load.

**Audit commentary**

An ICP is recorded for each item of load within the scope of this audit. There are also some privately owned streetlights included in the database which are discussed in **section 2.6**.

**Audit outcome**

Compliant

### 2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

**Code reference**

*Clause 11(2)(b) of Schedule 15.3*

**Code related audit information**

*The DUML database must contain the location of each DUML item.*

**Audit observation**

The database was checked to confirm the location is recorded for all items of load.

### Audit commentary

Global Positioning System (GPS) coordinates are recorded for all items of load and users in the office and field can view these locations on a mapping system.

The database contains the nearest street address for most items of load. 1396 items of load have no street address information recorded.

### Audit outcome

Compliant

## 2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

### Code reference

*Clause 11(2)(c) and (d) of Schedule 15.3*

### Code related audit information

*The DUML database must contain:*

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

### Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage.

### Audit commentary

Lamp model information is included in the database, and the corresponding ballast and true (total) wattage is maintained in a separate wattage table.

Six lights connected to HCC ICPs do not have make, model, or wattage information recorded. This is recorded as non-compliance below.

| OBJECTID_1 | ASSET_ID | prop_address | Light_Model_1 | Light_Model_2 | Light_Model_3 | Light_Model_4 | Light_Model_5 |
|---|---|---|---|---|---|---|---|
| 2457 | 350053R00411 | 14 Rail Way HUTT CENTRAL | - | | | | |
| 2458 | 350054R00411 | 14 Rail Way HUTT CENTRAL | - | | | | |
| 2459 | 350055R00411 | 14 Rail Way HUTT CENTRAL | - | | | | |
| 4122 | 350039R00411 | 14 Rail Way HUTT CENTRAL | - | | | | |
| 4802 | 350001R00529 | 62 Penrose Street WOBURN | - | | | | |

| | | | | | | | |
|---|---|---|---|---|---|---|---|
| 6998 | 350237R00410 | 8O Cambridge Terrace WAIWHETU | - | | | | |

I found that wattages were included in the wattage table for all lamp models recorded in the database.

**Audit outcome**

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 2.4<br>With: Clause 11(2)(c) and (d) of Schedule 15.3<br><br>From: unknown<br>To: 18-Apr-18 | Six lights connected to HCC ICPs do not have make and model information recorded.<br>Potential impact: Low<br>Actual impact: None<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **Low** | The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.<br>The impact is assessed to be low, because a small number of lamps are affected, and the wattage is expected to be low. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Contact will work with Hutt CC to get the DUML database updated with these correct values and attributes | Dec 2018 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| As above | As above | |

## 2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

**Code reference**

*Clause 11(2A) of Schedule 15.3*

**Code related audit information**

*The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.*

**Audit observation**

A field audit of a statistical sample of 458 items of load was undertaken. The total population was divided into two strata:

- new subdivision at Parklands in Wainuiomata and surrounding streets; and
- all other streets.

### Audit commentary

The field audit findings are detailed in the table below.

| Address | Database Count | Field Count | Count differences | Wattage differences | Comments |
|---|---|---|---|---|---|
| New subdivision area | | | | | |
| Brian Morgan Tce WAINUIOMATA | 19 | 19 | - | - | |
| Devon Street WAINUIOMATA | 3 | 3 | - | - | |
| Dover Road WAINUIOMATA | 17 | 17 | - | 3 | Three lights labelled L23 are recorded in database as LED 22W. |
| Heath Street WAINUIOMATA | 4 | 4 | - | - | |
| Kairanga Crescent WAINUIOMATA | 6 | 6 | - | - | |
| Kaponga Street WAINUIOMATA | 4 | 4 | - | - | |
| Karamea Grove WAINUIOMATA | 5 | 5 | - | - | |
| Kawatiri Grove WAINUIOMATA | 6 | 6 | - | - | |
| Kumeroa Grove WAINUIOMATA | 4 | 4 | - | - | |
| Manurewa Grove WAINUIOMATA | 4 | 4 | - | - | |
| Manutuke Street WAINUIOMATA | 4 | 4 | - | - | |
| Matariki Grove WAINUIOMATA | 2 | 2 | - | - | |
| Mataura Grove WAINUIOMATA | 4 | 4 | - | 1 | One light labelled L23 outside 4 is recorded in the database as 50W SON. |

| Address | Database Count | Field Count | Count differences | Wattage differences | Comments |
|---|---|---|---|---|---|
| Meremere Street WAINUIOMATA | 15 | 15 | - | 1 | One light labelled L27 outside 26-28 is recorded in database as LED 22W. |
| Miles Crescent WAINUIOMATA | 7 | 7 | - | - | |
| Mimihau Grove WAINUIOMATA | 4 | 4 | - | - | |
| Mitimiti Grove WAINUIOMATA | 3 | 3 | - | - | |
| Mohaka Street WAINUIOMATA | 14 | 14 | - | - | |
| Momona Street WAINUIOMATA | 8 | 8 | - | - | |
| Nelson Crescent WAINUIOMATA | 16 | 16 | - | 1 | One light labelled L27 outside 44 is recorded as LED 22W, and one light labelled L23 outside 25 is recorded as LED 27W. |
| Parkway WAINUIOMATA | 136 | 136 | - | - | |
| All other streets | | | | | |
| Atiawa Crescent WAIWHETU | 8 | 8 | - | - | |
| Barnes Street SEAVIEW | 9 | 9 | - | 1 | One light labelled L23 is recorded in database as LED 22W. |
| Faulke Avenue WAINUIOMATA | 10 | 10 | - | - | |
| Fitzherbert Road WAINUIOMATA | 42 | 42 | - | - | |
| Godley Street WAIWHETU | 8 | 8 | - | 2 | Two lights labelled as L27 outside 62 and 58A are recorded in the database as LED 22W. |
| Hayward Terrace WAIWHETU | 11 | 11 | - | - | |

| Address | Database Count | Field Count | Count differences | Wattage differences | Comments |
|---|---|---|---|---|---|
| Hinemoa Street WAIWHETU | 11 | 11 | - | - | |
| Leighton Avenue WAIWHETU | 16 | 16 | - | - | |
| Mawson Street WAIWHETU | 7 | 7 | - | - | |
| Meachen Street SEAVIEW | 6 | 6 | - | 1 | One light labelled L23 is recorded in database as LED 22W. |
| Meadows Avenue WAIWHETU | 10 | 10 | - | - | |
| Nikau Road POINT HOWARD | 16 | 16 | - | - | |
| Pirie Crescent MOERA | 11 | 11 | - | 2 | Two lights labelled L27 were recorded as 22W LED. |
| Waitui Crescent WAIWHETU | 8 | 8 | - | 1 | One light labelled L27 outside 22 is recorded in database as 50W SON. |
| **Total** | **458** | **458** | **-** | **13** | |

I did not identify any load missing from the database. There were 13 lamp wattage differences which are recorded as non-compliance in **section 3.1**.

**Audit outcome**

Compliant

## 2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

**Code reference**

*Clause 11(3) of Schedule 15.3*

**Code related audit information**

*The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.*

**Audit observation**

The process for tracking of changes in the database was examined.

**Audit commentary**

Any changes that are made during any given month take effect from the beginning of that month. The information is available which would allow for the total load in kW to be retrospectively derived for any

day. On 20 September 2012, the Authority sent a memo to retailers and auditors advising that tracking of load changes at a daily level was not required if the database contained an audit trail. I have interpreted this to mean that the provision of a copy of the report to Contact each month is sufficient to achieve compliance.

The RAMM database used for submission is managed by HCC. New connection, fault and maintenance work is completed by Fulton Hogan. Fulton Hogan update the database using Pocket RAMM. HCC provide a monthly report to Contact from the database.

An LED upgrade project is being planned. HCC is investigating whether a central management system or dimming will be used.

The new connections process for subdivisions has the following steps:

1. A plan is prepared by the developer and approved by HCC.
2. The installation is completed.
3. HCC notifies Contact that livening is required.
4. Contact requests livening from Wellington Electricity.
5. An "as built" plan is provided to HCC.
6. The database is updated.

Steps 5 and 6 can be delayed in some cases. A new subdivision was checked during the field audit and the database matched what was present in the field. I did not see any examples of late updates for new connections during the audit.

There are 32 private lights recorded in the database. HCC is working with Wellington Electricity and Contact Energy to confirm light ownership and arrange creation of shared unmetered ICPs for the private lights.

Christmas lights are included in the database and are deleted from the summary sheet provided to Contact Energy when they are switched off, to make sure they are excluded from submissions where not connected.

Outage patrols occur weekly, with sample of streets in seven areas visited each month. Outage patrols are completed by HCC and by Fulton Hogan as part of their maintenance project.

**Audit outcome**

Compliant

### 2.7. Audit trail (Clause 11(4) of Schedule 15.3)

**Code reference**

*Clause 11(4) of Schedule 15.3*

**Code related audit information**

*The DUML database must incorporate an audit trail of all additions and changes that identify:*

- *the before and after values for changes*
- *the date and time of the change or addition*
- *the person who made the addition or change to the database*

**Audit observation**

The database was checked for audit trails.

**Audit commentary**

HCC demonstrated a complete audit trail of all additions and changes to the database information.

### Audit outcome

Compliant

## 3. ACCURACY OF DUML DATABASE

### 3.1. Database accuracy (Clause 15.2 and 15.37B(b))

**Code reference**

*Clause 15.2 and 15.37B(b)*

**Code related audit information**

*Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.*

**Audit observation**

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

| Plan Item | Comments |
|---|---|
| Area of interest | HCC region |
| Strata | The database contains items of load in the HCC area.<br>The processes for the management of all HCC items of load are the same, and I decided to create two strata:<br>• New subdivision at Parklands in Wainuiomata and surrounding streets; and<br>• All other streets. |
| Area units | For the new subdivision, I used a map to identify the streets in the area and selected a sample of 21 streets, including streets within the subdivision.<br>For the remaining streets I created a pivot table of the streets and used random number generator in a spreadsheet to select a sample of streets. A total of 14 sub-units were selected. |
| Total items of load | 458 items of load were checked. |

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority.

**Audit commentary**

The database was found to contain some inaccuracies. The field audit found 13 lamp type and wattage differences.

The field data was 99.9% of the database data for the sample checked. The total wattage recorded in the database for the sample was 41,369 watts. The total wattage found in the field for the sample checked was 41,328 watts, a difference of 41 watts. This will result in estimated over submission of 175 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).

Wattages for all items of load were checked against the published standardised wattage tables produced by the Electricity Authority and Veritek, or the manufacturer's specifications.

Ballast wattages did not match expected values for the following lamp types:

| Lamp Type | Ballast wattage in database | Expected ballast wattage | Count of lamps affected | Total wattage difference |
|---|---|---|---|---|
| 2x58W FLUORO | 8 | 28 | 20 | 400 |
| 36W FLUORO | 2 | 10 | 35 | 280 |
| 58W FLUORO | 4 | 14 | 11 | 110 |
| | | **Total** | **66** | **790** |

Christmas lights are recorded with 19 W per Christmas light, rather than the true wattage of each light. I recommend that the database is updated to reflect the correct wattage of each Christmas light. There are 151 Christmas lights recorded in the database.

| Description | Recommendation | Audited party comment | Remedial action |
|---|---|---|---|
| Database accuracy | Confirm and record correct wattages for Christmas lights. | Contact will work with Hutt CC to get the DUML database updated with these correct values | Identified |

**Audit outcome**

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 3.1<br>With: Clause 15.2 and 15.37B(b)<br><br>From: unknown<br>To: 18-Apr-18 | The database used to prepare submissions contains some inaccurate information.<br>• The database accuracy is assessed to be 99.9% indicating an estimated over submission of 175 kWh per annum.<br>• 66 lamps have incorrect ballast wattage recorded. The errors amount to 790 watts, resulting in over submission of 3,374 kWh per annum.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **Low** | The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.<br>The impact is assessed to be low, based on the kWh differences described above. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Contact will work with Hutt CC to get the DUML database updated with these correct values and attributes | Dec 2018 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| As above | As above | |

### 3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

**Code reference**

*Clause 15.2 and 15.37B(c)*

**Code related audit information**

*The audit must verify that:*

- *volume information for the DUML is being calculated accurately*
- *profiles for DUML have been correctly applied.*

**Audit observation**

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that all ICPs have the correct profile and submission flag.
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

**Audit commentary**

Contact reconciles this DUML load using the HHR profile, in accordance with exemption number 177. This exemption is discussed further in **section 1.1**.

The registry shows HHR RPS profile for the HCC ICPs but should show HHR. Contact usually manually corrects the profiles on business day four each month, but the corrections in recent months were missed due to a staff member being on leave. This is recorded as non-compliance below.

| ICP Number | Registry Profile | Date |
|---|---|---|
| 0001256864UN8C4 | RPS HHR | 01/12/2017-07/04/2018 |
| 0001256868UNBDA | RPS HHR | 01/12/2017-07/04/2018 |
| 0001255305UNA9F | RPS HHR | 01/12/2017-07/04/2018 |
| 0001256863UN50E | RPS HHR | 01/12/2017-07/04/2018 |

Submissions are based on the database information, with on and off times derived from data logger information.

I recalculated the submissions for February 2018 for ICPs all four ICPs using the data logger and database information. I confirmed that the calculation method was correct. Festive lights were correctly excluded from the calculation because they were not connected in that submission period.

There is some inaccurate data within the database used to calculate submissions. This is recorded as non-compliance and discussed in **section 3.1**.

**Audit outcome**

Non-compliant

| Non-compliance | Description |
|---|---|
| Audit Ref: 3.2<br>With: Clause 15.2 and 15.37B(c)<br><br>From: unknown<br>To: 18-Apr-18 | The database used to prepare submissions contains some inaccurate information.<br>• The database accuracy is assessed to be 99.9% indicating an estimated over submission of 175 kWh per annum.<br>• 66 lamps have incorrect ballast wattage recorded. The errors amount to 790 watts, resulting in over submission of 3,374 kWh per annum.<br>Incorrect profiles are recorded on the registry.<br>Potential impact: Low<br>Actual impact: Low<br>Audit history: None<br>Controls: Moderate<br>Breach risk rating: 2 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **Low** | The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.<br>The impact is assessed to be low, based on the kWh differences described above. Profiles were recorded correctly on the registry for most of the audit period. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Contact will work with Hutt CC to get the DUML database updated with these correct values and attributes | Dec 2018 | Identified |
| 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 | July 2018 | |

| Preventative actions taken to ensure no further issues will occur | Completion date | |
|---|---|---|
| As above | As above | |

## CONCLUSION

The RAMM database used for submission is managed by HCC. New connection, fault and maintenance work is completed by Fulton Hogan. Fulton Hogan update the database using Pocket RAMM. HCC provide a monthly report to Contact from the database.

The future risk rating of eight indicates that the next audit be completed in 18 months. Four non-compliances were identified, and one recommendation was raised.

## PARTICIPANT RESPONSE

Contact have reviewed this report, and their comments are contained within its body.