

Compliance plan for NZTA Northland DUML – 2018

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 17.295F of part 17 From: 01-Jun-18 To: 31-Jul-18	Audit not completed within 12 month of Part 16A coming into effect. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, as Genesis are reliant on the database provider to supply the data and in this case the delay caused this report to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have begun to establish communications with NZTA Northland database owner and have started to acquire the information required to Audit/bill and settle	01/07/2018	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis now have the essential contact information for the parties whom administer the information in the NZTA database. Genesis will continue to work with NZTA Northland on the continued efforts improve data quality.	01/07/2018	

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 24-May-17 To: 31-May-18	Net estimated under submission of 164,688 kWh per annum. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	Controls are rated as weak as the database is has a high level of inaccuracy. 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
Genesis Energy are currently receiving monthly information from TOPE relating to the NZTA Northland ICP's. We note that we also believe that this information is incomplete. Genesis has reviewed the data received and will be requesting further details to validate these findings.	01/12/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has enquired if the database owner is in fact TOPE or whether this is maintained by a third party. Genesis has also requested that the received reporting of monthly volumes by TOPE be reviewed and addition information added.	01/12/2018	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 24-May-17 To: 31-May-18	163 lights with no input wattage being recorded resulting in under submission of an estimated 100,219 kWh. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	Controls are rated as weak as the database has not been updated to reflect the field information. The risk is high due to the impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have enquired to TOPE as to the database accuracy and to investigate the missing lamps.		01/12/2018	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
As Genesis are not the database owner, Genesis rely on the data provided by contracted parties to ensure accuracy. Genesis will work with the data supplier (Distributor) to ensure the data provided is complete and accurate.		01/12/2018	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1 With: Clause 11(2A) of Schedule 15.3</p> <p>From: 24-May-17 To: 31-May-18</p>	<p>413 items of load with incorrect ballasts being applied resulting in over submission of an estimated 7,120 kWh per annum.</p> <p>The field data was 99.4% of the database data indicating over submission of 1,849 kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</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 weak as the database has not been updated to reflect the field information.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have enquired to TOPE as to the database accuracy and to investigate the missing lamps.	01/12/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As Genesis are not the database owner, Genesis rely on the data provided by contracted parties to ensure accuracy. Genesis will work with the data supplier (Distributor) to ensure the data provided is complete and accurate.	01/12/2018	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 24-May-17 To: 31-May-18	Net estimated under submission of 164,688 kWh per annum. Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	Controls are rated as weak as the database is has a high level of inaccuracy indicating controls are weak. 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
Genesis have enquired to TOPE as to the database accuracy. Genesis will be working with the distributor to move forward with meeting the requirements outlined in the DUML guidelines.	01/12/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As Genesis are not the database owner, Genesis rely on the data provided by contracted parties to ensure accuracy. Genesis will work with the data supplier (Distributor) to ensure the data provided is complete and accurate.	01/12/2018	