Compliance plan for Grey District Council Distributed Unmetered Load for Genesis Energy Limited

Title: Deriving Submiss	ion Information
Non-compliance	Description
Audit Ref: 2.1	The database used to prepare submissions contains some inaccurate information.
With: Clause 11(1) of Schedule 15.3	 The field data was 100.2% of the database data indicating an estimated under submission of 171 kWh per annum.
	 Two 160W MBFU lights are recorded with a total wattage of 180W each instead of 175W, indicating an estimated over submission of 43 kWh per annum.
	 Nine items of load have missing light type, description and/or wattage information.
	• Festive lights are not recorded in the database. The impact of this is unknown.
	 Some street address descriptions were inconsistent with the GPS coordinate information. March 2018 initial submissions for ICPs 0000950040WP4EC, 0000950090WP9AE and 0000950020WPB1C were based on the daily average burn hours for February 2018, resulting in under submission of 3,169 kWh. ICPs 0000950091WP5EB and 0000950092WP92B became active effective from 01/02/2018 on 11/04/2018. No consumption was reported for the February and March 2018 initial submissions. Based on the database and logger information, expected submissions were 474 kWh for February 2018 and 594 kWh for March 2018.
	Potential impact: Low
	Actual impact: Low
From: unknown	Audit history: None
To: 04-May-18	Controls: Moderate
	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 submission information is correct most of the time. 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
Genesis will work with database administrator to rectify the issues outlined in 2.1	10/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4Nine items of load have unknown or blank lamp model, and/or blanWith: Clause 11(2)(c)wattage.		lel, and/or blank lamp	
and (d) of Schedule 15.3	Potential impact: Low Actual impact: Low		
From: unknown To: 04-May-18	Audit history: Once previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for	audit risk rating	3
Low	The controls are rated as moderate, because most items of load have capacity and wattage information recorded.		ems of load have
	The impact is assessed to be low because 17 items of load (0.6%) are affected, and only two (0.1%) have missing wattage information.		• •
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Genesis will work with issues outlined.	database administrator to rectify the	10/2018	Identified
Preventative actions ta	aken to ensure no further issues will occur	Completion date	
-	th contracted parties to help formation supplied by 3 rd parties.	10/2018	

Title: All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	One lamp was not recorded in the database.		
With: Clause 11(2A)	Festive lights are not recorded in the database.		
of Schedule 15.3	Potential impact: Low		
	Actual impact: Low		
	Audit history: Once previously		
From: unknown	Controls: Weak		
To: 04-May-18	Breach risk rating: 3		
Audit risk rating	Rationale for	audit risk rating	3
Low	Controls are rated as weak as they are not sufficient to ensure that all light including Christmas lights are recorded in the database.		•
	The impact is unknown but is rated a Christmas lights and they are only us difference for the sample of lights ch	ed during the fe	stive season. The
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Genesis will work with issues outlined	database administrator to rectify the	10/2018	Identified
Preventative actions ta	aken to ensure no further issues will occur	Completion date	
•	th contracted parties to help formation supplied by 3 rd parties.	10/2018	

Title: Database accura	itle: Database accuracy		
Non-compliance	Description		
Audit Ref: 3.1	The database contains some incorrect and missing information.		
With: Clause 15.2 and 15.37B(b)	• The field data was 100.2% of the database data indicating an estimated under submission of 171 kWh per annum.		
	 Two 160W MBFU lights are r each instead of 175W, indica 43 kWh per annum. 		-
 Nine items of load have missing light type, description wattage information. 			escription and/or
	• Festive lights are not recorded in the database. The impact of this unknown.		
	• Some street address descriptions were inconsistent with the GPS coordinate information.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: None		
From: unknown	Controls: Moderate		
To: 04-May-18	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.		
	The impact is assessed to be low, based on the kWh differences described above.		
Actions ta	taken to resolve the issue Completion Remedial action date status		
Genesis will work with issues outlined in 2.1	Genesis will work with database administrator to rectify the 10/2018 Identified issues outlined in 2.1		Identified
Preventative actions ta	aken to ensure no further issues will occur	Completion date	
	th contracted parties to help formation supplied by 3 rd parties.	10/2018	

Title: Volume informat	/olume information accuracy		
Non-compliance	Description		
Audit Ref: 3.2	The database used to prepare submissions contains some inaccurate information.		
With: Clause 15.2 and 15.37B(c)	 The field data was 100.2% of the database data indicating an estimated under submission of 171 kWh per annum. Two 160W MBFU lights are recorded with a total wattage of 180W each instead of 175W, indicating an estimated over submission of 43 kWh per annum. 		
	 Nine items of load have missing light type, description and/or wattage information. 		
	 Festive lights are not recorded unknown. 	ed in the databa	se. The impact of this is
From: unknown To: 04-May-18	 unknown. Some street address descriptions were inconsistent with the GPS coordinate information. March 2018 initial submissions for ICPs 0000950040WP4EC, 0000950090WP9AE and 0000950020WPB1C were based on the daily average burn hours for February 2018, resulting in under submission of 3,169 kWh. ICPs 0000950091WP5EB and 0000950092WP92B became active effective from 01/02/2018 on 11/04/2018. No consumption was reported for the February and March 2018 initial submissions. Based on the database and logger information, expected submissions were 474 kWh for February 2018 and 594 kWh for March 2018. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate 		
Audit risk rating	Breach risk rating: 2 Rationale for audit risk rating		
Low	The controls are rated as moderate, because they are sufficient to ensure that submission information is correct most of the time. The impact is assessed to be low, based on the kWh differences described above.		
Actions ta	aken to resolve the issue Completion Remedial action date status		
Genesis will work with issues outlined in 2.1	a database administrator to rectify the 10/2018 Identified		

Preventative actions taken to ensure no further issues will occur	Completion date
Genesis are working with contracted parties to help maintain accuracy of information supplied by 3 rd parties.	10/2018