

Compliance plan for New Plymouth District Council Distributed Unmetered Load for Genesis Energy Limited

Title: Deriving Submission Information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: entire audit period</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong, as they are sufficient to mitigate the risk most of the time. A very small number of discrepancies were identified in relation to the database size.</p> <p>The differences would result in over reporting of approximately 1030 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis have been working with the NPDC and they have been very proactive in their efforts in ensuring accurate data. There is still a delay in getting changes into the system which the has been identified above and are timing issues. NPDC are working with third parties in how they can gain efficiencies in the current process.</p>	01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis believe that NPDC are proactive in trying to find a solution to the delay with change notifications and new connections.</p>	01/10/2018	

Title: Description of Load Type		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) & (d) of Schedule 15.3</p> <p>From: entire audit period</p>	<p>11 lamps do not have lamp wattage, gear wattage, or lamp make and model information recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong, as they are sufficient to mitigate the risk most of the time. 19 discrepancies (0.2% of the database) were identified.</p> <p>I was unable to confirm the correct wattages for the lamps with missing details, but the impact is expected to be low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NPDC are currently deploying LED in the area and some changes have not been updated at the time of the audit (timing). As iterated in 2.1 there is a timing issue constraint due to the current process. An indicative date has been applied however process improvements may or may not occur, as its dependent on all parties involved.</p>	01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Third party involvement in tracking of changes and/or new connections is very hard to manage. We believe this should be a task that the networks should be actively involved in as they directly have an invested interest, and should drive the database accuracy and maintain data pertaining to the DUML load connected on their network.</p>	01/10/2018	

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: entire audit period</p>	<p>Database updates may be late for lights in 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 NPDC will usually identify recently connected lamps through its outage patrol processes.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Third party involvement in tracking of changes has its constraints in notifying NPDC of new connections. NPDC are looking at how efficiencies can be gained in this process. However, there is no assurances that there is a solution to the current process constraints.</p>	01/10/2018	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis are in communication with NPDC in relation to this issue. It is again noted that the connection process will generally have been initiated through the network in which we believe they have a huge role to play in ensuring database accuracy, or potential ownership.</p>	01/10/2018	

Title: Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2</p> <p>From: entire audit period</p>	<p>The database contains some inaccurate information.</p> <ul style="list-style-type: none"> • For the sample of 401 lamps checked in the field audit, five lamps had wattage differences. Four appeared to relate to timing differences between the database and field audit. • 11 lamps did not have lamp or gear wattages populated. • Eight lamps did not have correct gear wattages recorded. • One lamp was recorded with inconsistent lamp and gear wattages. <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as strong, as they are sufficient to mitigate the risk most of the time. A very small number of discrepancies were identified in relation to the database size.</p> <p>The differences would result in over reporting of approximately 1030 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Ref 2.6	01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Network should hold this responsibility as they provide the initial connection in which we believe has a huge role to play in ensuring database accuracy, or potential ownership of said database.	01/10/2018	

Title: Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 From: entire audit period	The database used to prepare submissions contains some inaccurate information. Potential impact: Low Actual impact: Unknown Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, as they are sufficient to mitigate the risk most of the time. A very small number of discrepancies were identified in relation to the database size. The differences would result in over reporting of approximately 1030 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
As per 2.6 – Efforts are being made to ensure timely delivery of change notifications or livening.	01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The network has a role in the initial livening and must play in ensuring database accuracy, or potential ownership of said database. The network is the only nontransferable variable in the relationship of DUML.	01/10/2018	