

Compliance plan for Horowhenua 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: Low</p> <p>Audit history: None</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, as most lamps have the correct wattages recorded in the database.</p> <p>It is estimated that the wattage differences could result in under reporting of around 10,000 kWh per annum. 3607-53PB 70WHPS was promptly checked and corrected to 70W by Alf Downs.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Genesis are working with the database owner to maintain exceptions where identified. | 10/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Awaiting database owner's response - what controls are in place to validate lamp descriptions and wattages/ballasts in order for Genesis to rectify their submission volume. | 10/2018 | |

| Title: All load recorded in database | | |
|--|--|-------------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3</p> <p>From: entire audit period</p> | <p>For the sample of 203 lamps checked, two lamps were not recorded in the database.</p> <p>Six lamps situated at Muhunoa West Road, Ohau are located in tunnels and the burn hours differ from other lamps connected to the ICP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | Controls are rated as moderate because most lamps were recorded accurately. The impact is low, because a small number of lamps were affected. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Genesis are working with the database owner to maintain exceptions where identified. | 10/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| <p>Waiting for database owner's response. Will need to investigate the tunnel load details, and the issue of tracking changes with the LED deployment.</p> <p>6 lamps 24hr will require their own ICP submitted under UML profile. Will work with the DC and the network to get this administered.</p> | 10/2018 | |

| Title: Database Accuracy | | |
|---|---|-------------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 3.1 With: Clause 15.2</p> <p>From: entire audit period</p> | <p>HDC applies unapproved profiles to adjust specified lamp wattages to account for different dimming. 129 recorded lamp wattages differ from expected values.</p> <p>50 wattage differences and two lamp count differences were found for the sample of 203 lamps checked.</p> <p>Six lamps situated at Muhunoa West Road, Ohau are located in tunnels and the burn hours differ from other lamps connected to the ICP.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</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, as most lamps have the correct wattages recorded in the database.</p> <p>It is estimated that the wattage differences could result in under reporting of around 10,000 kWh per annum. 3607-53PB 70WHPS was promptly checked and corrected to 70W by Alf Downs.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Genesis are working with the database owner to maintain exceptions where identified. | 10/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| <p>As referred to in 2.5</p> <p>Waiting for database owner's response. Will need to investigate the tunnel load details, and the issue of tracking changes with the LED deployment.</p> <p>6 lamps 24hr will require their own ICP submitted under UML profile. Will work with the DC and the network to get this administered.</p> | 10/2018 | |

| Title: Volume Information Accuracy | | |
|---|--|-------------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 3.2 With: Clause 15.2</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: Low</p> <p>Audit history: None</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, as most lamps have the correct wattages recorded in the database.</p> <p>It is estimated that the wattage differences could result in under reporting of around 10,000 kWh per annum.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| Genesis are working with the database owner to maintain exceptions where identified. | 10/2018 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| As discussed in 2.5 & 3.1. Most LED upgrade information is delayed due to a field audit conducted post deployment. Genesis will discuss whether this information could be more timely enabling accuracy in initial monthly volumes. | 10/2018 | |