

Compliance plan for Western Bay of Plenty DC DUML - Trustpower – 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: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as Trustpower have good controls in place to ensure DUML audits are completed within the required timeframe. The 100% field audit needed to be completed before this audit to give a true picture of the database accuracy. 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
Westlink was in the middle of carrying out a significant update of the database at the time that the audit was required. In order to maximise data effectiveness, Trustpower audit took place later than anticipated and this missed the June 1 st deadline.	Completed	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Work with Westlink to ensure data is accurate and .DUML audits are completed on time	By the date of the next audit	

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3 From: 01-Jun-17 To: 31-May-18	Under submission of an estimated 23,800 kWh per annum. Potential impact: High Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time but there are still some errors. The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Working with Powerco to tighten livening rules on new sub-divisions. Discussions with customer and Powerco to determine if charging the Developer with a metered supply could resolve this issue. Additionally, Trustpower will work with Westlink to ensure future accuracy of data for vested lighting.	31/12/18	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Maintenance and validation processes to be reviewed and updated where needed	Ongoing	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 28-Jun-18	38 lights electrically connected but not included in the database extract used for submission. Potential impact: Medium 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 because they ensure most information is accurate. The impact is low as the volume of lights not yet vested to the council is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
New lamps will be owned by WBOPDC once the sub-division has been completed and WBOPDC take ownership. TRUS working with Powerco & customer to determine effective process	31/12/18	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Maintenance and validation processes to be reviewed and updated where needed	Ongoing	

Non-compliance	Description	
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: unknown To: 28-Jun-18	New lights are not added to the database for reconciliation in the month they are vested to council. Potential impact: Medium 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 because they ensure most information is accurate. The impact is low as the volume of lights not yet vested to the council is small.	
Actions taken to resolve the issue		Completion date
Powerco and Trustpower are working on this issue to currently.		Dec 2018
Preventative actions taken to ensure no further issues will occur		Completion date
Processes to be reviewed and updated where needed		Ongoing
Remedial action status		
Investigating		

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 31-Jul-18	The database accuracy is assessed to be 102.8% indicating an estimated under submission of 23,800 kWh per annum. Potential impact: High Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate, because they are sufficient to ensure that the database is accurate most of the time. The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
New lamps will be owned by WBOPDC once the sub-division has been completed and WBOPDC take ownership. Database updated accordingly. Powerco and Trustpower in discussion to determine effective process. Additionally, Trustpower will work with Westlink to ensure future accuracy of data for vested lighting.	31/12/18	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Processes to be reviewed and updated where needed	Ongoing	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: 01-Jun-17 To: current	Under submission of an estimated 23,800 kWh per annum Potential impact: High Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time but there are still some errors. The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
New lamps will be owned by WBOPDC once the sub-division has been completed and WBOPDC take ownership. Database to be updated accordingly. Powerco and Trustpower in discussion to determine effective process. . Additionally, Trustpower will work with Westlink to ensure future accuracy of data for vested lighting.	31/12/18	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Processes to be reviewed and updated where needed	Ongoing	