# ELECTRICITY INDUSTRY PARTICIPATION CODE DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

# CHRISTCHURCH CITY COUNCIL – UNMETERED TRAFFIC LIGHTS AND GENESIS ENERGY LIMITED

Prepared by: Steve Woods (assisted by Deborah Anderson)

Date audit commenced: 23 April 2018

Date audit report completed: 8 May 2018

Audit report due date: 01-Jun-18

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#### **EXECUTIVE SUMMARY**

This audit of the Christchurch City Council's – Christchurch Transport Operation Centre (CTOC) Unmetered Traffic Light DUML database and processes was conducted at the request of Genesis Energy Limited (Genesis), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1, which became effective on 1 June 2017.

The traffic light unmetered load is managed in an access database by Christchurch City Council's Christchurch Transport Operations Centre (CTOC) with a monthly report for reconciliation and billing being provided to Genesis.

Items of load are held in CTOC's database by GXP.

The audit found five non-compliances and makes no recommendations.

The field audit found no discrepancies.

The database accuracy is assessed to be 100% indicating no over or under submission but there was a discrepancy found with the March 2018 submission.

The future risk rating of 10 indicates that the next audit be completed in 12 months. The matters raised are detailed below:

#### **AUDIT SUMMARY**

#### **NON-COMPLIANCES**

| Subject                                   | Section | Clause   | Non Compliance  | Controls | Audit<br>Risk<br>Rating | Breach<br>Risk<br>Rating | Remedial<br>Action |
|---|---------|--|---|----------|-------------------------|--------------------------|--------------------|
| Deriving<br>submission<br>information     | 2.1     | 11(1) of<br>Schedule<br>15.3                   | Over submission occurring due to disconnected lights being included in the monthly report.  | Moderate | Low                     | 2                        | Unknown            |
| ICP<br>identifier<br>and items<br>of load | 2.2     | 11(2)(a)<br>and (aa)<br>of<br>Schedule<br>15.3 | <ul> <li>No ICP identifier recorded against each item of load in the traffic light access database.</li> <li>Five items of load with no GXP recorded</li> </ul> | Moderate | None                    | 2                        | Unknown            |
| Tracking of load changes                  | 2.6     | 11(3) of<br>Schedule<br>15.3                   | Disconnected traffic lights not tracked in the database   | Moderate | Low                     | 2                        | Unknown            |
| Audit trail                               | 2.7     | 11(4) of<br>Schedule<br>15.3                   | No audit trail of changes made in the   | Moderate | Low                     | 2                        | Unknown            |

|                                   |     |                       | access database.   |          |     |   |         |
|-----------------------------------|-----|-----------------------|--|----------|-----|---|---------|
| Volume<br>information<br>accuracy | 3.2 | 15.2 and<br>15.37B(c) | Under submission for<br>the March 2018<br>period due to the<br>incorrect monthly<br>report being used to<br>calculate the<br>submission. | Moderate | Low | 2 | Unknown |
|                                   |     | 10                    |  |          |     |   |         |

| Future risk rating         | 1-3       | 4-6       | 7-8       | 9-17      | 18-26    | 27+      |
|----------------------------|-----------|-----------|-----------|-----------|----------|----------|
| Indicative audit frequency | 36 months | 24 months | 18 months | 12 months | 6 months | 3 months |

# RECOMMENDATIONS

| Subject | Section | Description | Recommendation |
|---------|---------|-------------|----------------|
|         |         |             |                |

# ISSUES

| Subject | Section | Description | Issue |
|---------|---------|-------------|-------|
|         |         |             |       |

#### 1. ADMINISTRATIVE

#### 1.1. Exemptions from Obligations to Comply with Code

#### **Code reference**

Section 11 of Electricity Industry Act 2010.

#### **Code related audit information**

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

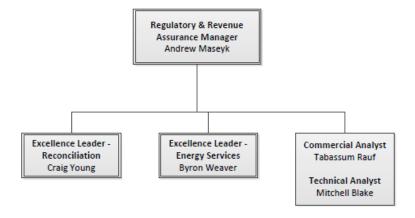
#### **Audit observation**

The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit. No exemptions are in place.

#### **Audit commentary**

Compliance is confirmed.

#### 1.2. Structure of Organisation



#### 1.3. Persons involved in this audit

Auditor:

**Steve Woods** 

**Veritek Limited** 

#### **Electricity Authority Approved Auditor**

Other personnel assisting in this audit were:

| Name         | Title                             | Company  |
|--------------|-----------------------------------|--|
| Bruce Kelly  | SCATS Engineer                    | Christchurch Transport Operation Centre –<br>Christchurch City Council |
| Shweta Arora | Reconciliation Systems<br>Analyst | Genesis Energy   |

#### 1.4. Hardware and Software

CTOC maintains an Access database for the management of the DUML information. Access to GIS and the Access database are secure by way of password protection.

Backup and restoration procedures are in accordance with normal industry protocols.

#### 1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

#### 1.6. ICP Data

The following ICPs are relevant to the scope of this audit:

| ICP Number      | Description                                       | NSP              | Profile | Number of<br>items of<br>load | Database wattage<br>(watts) |
|-----------------|---|------------------|---------|-------------------------------|-----------------------------|
| 0007102602RN872 | Orion_Bromley<br>66kV GXP Traffic<br>Lights       | BRY0661          | UNM     | 72                            | 11,612.94                   |
| 0007102603RN437 | Orion_Islington<br>33kV GXP Traffic<br>Lights     | ISL0331          | UNM     | 14                            | 2,982.76                    |
| 0007102604RN9FD | Orion_Islington<br>66kV GXP Traffic<br>Lights     | ISL0661 & blanks | UNM     | 330<br>3                      | 65,937.04<br>34.78          |
| 0000298513MPF38 | TRAFFIC LIGHTS OFF RAMP MAIN NORTH & EMPIRE ROADS | KAI0111          | UNM     | 5                             | 183.58                      |

#### 1.7. Authorisation Received

All information was provided directly by Genesis or the CCC's Christchurch Transport Operation Centre.

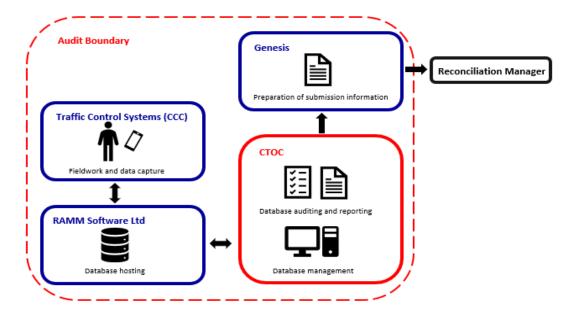
#### 1.8. Scope of Audit

This audit of the CTOC DUML database and processes was conducted at the request of Genesis, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1, which became effective on 1 June 2017.

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting.

The diagram below shows the audit boundary for clarity:



The field audit was undertaken of a statistical sample of 100 items of load on 25th April 2018.

# 1.9. Summary of previous audit

Genesis provided a copy of the last audit report undertaken by Rebecca Elliot of Veritek, completed in May 2017. The table below records the findings.

| Subject                               | Section | Clause                               | Non compliance   | Status         |
|---------------------------------------|---------|--------------------------------------|--|----------------|
| Deriving<br>Submission<br>Information | 2.1     | 11(1)<br>of<br>schedu<br>le 15.3     | Over submission occurring due to disconnected lights being included in the monthly report. | Still existing |
| ICP Identifier                        | 2.2.1   | 11(2)(a<br>) of<br>schedu<br>le 15.3 | No ICP identifier in the traffic light access database.                                    | Still existing |
| Tracking of load change               | 2.3     | 11(3)<br>of<br>schedu<br>le 15.3     | Disconnected traffic lights not tracked in the database.                                   | Still existing |
| Audit trail                           | 2.4     | 1(4) of<br>schedu<br>le 15.3         | No audit trail of changes made in the access database.                                     | Still existing |

## 1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

#### **Code reference**

Clause 16A.26 and 17.295F

#### **Code related audit information**

Retailers must ensure that DUML database audits are completed:

- 1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)
- 2. within 3 months of submission to the reconciliation manager (for new DUML)
- 3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.

#### **Audit observation**

Genesis have requested Veritek to undertake this streetlight audit.

#### **Audit commentary**

This audit report confirms that the requirement to conduct an audit has been met for this database within the required timeframe. Compliance is confirmed.

#### 2. **DUML DATABASE REQUIREMENTS**

#### 2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

#### **Code reference**

Clause 11(1) of Schedule 15.3

#### **Code related audit information**

The retailer must ensure the:

- DUML database is up to date
- methodology for deriving submission information complies with Schedule 15.5.

#### **Audit observation**

The process for calculation of consumption was examined and the application of profiles was checked. The database was checked for accuracy.

#### **Audit commentary**

Genesis reconciles this unmetered Traffic Light DUML load using the UNM profile as these lights are operational 24 hours a day.

The traffic light access database calculates the load based on the wattage of each item of load and the burn time of each light. The burn time has been calculated based on the various light types and sequencing patterns over a 24 hour time span.

The city rebuild continues and as part of that existing traffic lights are turned off, but these are not made inactive in the database therefore in these instances over submission will be occurring. The database has no audit trail and therefore I am unable to calculate the volume of over submission in relation this this. This is recorded as non-compliance below.

I checked the March 2018 extract provided by CTOC against the submission totals supplied by Genesis and found that submission appears to have used the February database multiplied by 31 days. The difference between CTOC's database totals for the March 2018 period and the submission information provided by GENE is 1,268.42 kWh for the month of March.

The submission difference is recorded as a non-compliance in section 3.2.

| Council                        | ICPs              | Profile | GXP       | Database volume for month of March from CTOC T Dakers 04/04 | Volume submitted for month of March | Submission<br>difference |
|--------------------------------|-------------------|---------|-----------|---|-------------------------------------|--------------------------|
| Christchurch CC traffic        |                   |         |           |   |                                     |                          |
| lights                         | 0007102602RN872   | UNM     | BRY0661   | 11,612.94   | 11,419.07                           | -193.87                  |
| Christchurch CC traffic lights | 0007102603RN437   | UNM     | ISL0331   | 2,982.76  | 2,370.39                            | -612.37                  |
| Christchurch CC traffic        |                   |         |           |   |                                     |                          |
| lights                         | 0007102604RN9FD   | UNM     | ISL0661   | 65,971.82   | 65,509.64                           | -462.18                  |
| Christchurch CC traffic lights | 0000298513MPF38   | UNM     | KAI0111   | 183.58  | 183.58                              | _                        |
| 1181113                        | 00002303131411130 | 014141  | 10 110111 | 103.50  | 103.30                              | -1,268.42                |

#### **Audit outcome**

#### Non-compliant

| Non-compliance                                      |  | Description  |                        |  |  |  |  |  |
|---|--|--|------------------------|--|--|--|--|--|
| Audit Ref: 2.1 With: Clause 11(1) of                | Over submission occurring due to disconnected lights being included in the monthly report. |  |                        |  |  |  |  |  |
| Schedule 15.3                                       | Potential impact: Low  |  |                        |  |  |  |  |  |
|   | Actual impact: Low   |  |                        |  |  |  |  |  |
| From: 01-May-17                                     | Audit history: Once  |  |                        |  |  |  |  |  |
| To: 30-Apr-18                                       | Controls: Moderate   |  |                        |  |  |  |  |  |
|   | Breach risk rating: 2  |  |                        |  |  |  |  |  |
| Audit risk rating                                   | Rationale for audit risk rating  |  |                        |  |  |  |  |  |
| Low   | information is correctly recorded  | 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 not able to be determined but rated as low due to the relatively small number of traffic lights affected. |                        |  |  |  |  |  |
| Actions taker                                       | n to resolve the issue   | Completion date  | Remedial action status |  |  |  |  |  |
|   | and discuss the content of this mproving both database and .                               | 12/2018  | Unknown                |  |  |  |  |  |
|   | ken to ensure no further issues<br>vill occur  | Completion date  |                        |  |  |  |  |  |
| Genesis will make recomme improve CCT's current pro | mendations with the intent to ocesses  | 12/2018  |                        |  |  |  |  |  |

# 2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

#### **Code reference**

Clause 11(2)(a) and (aa) of Schedule 15.3

# **Code related audit information**

The DUML database must contain:

- each ICP identifier for which the retailer is responsible for the DUML
- the items of load associated with the ICP identifier.

#### **Audit observation**

The database was checked to confirm the correct ICP was recorded against each item of load.

#### **Audit commentary**

All bar 5 CTOC items of load have GXP recorded against them, but no ICP number.

There are 5 items that do not have a GXP recorded against them. Their usage is included in the submission for ISL0661.

| SiteID | SiteName   | Status | RCA  | Region | IntCommd   | GXPCode | Num<br>Pwr<br>Cons | Site<br>Units<br>Per<br>Day |
|--------|--|--------|------|--------|------------|---------|--------------------|-----------------------------|
| 513    | Halswell Junction/Springs<br>(Roundabout Metering) | С      | NZTA | CHC    | 14/09/2017 |         | 1                  | 0.93                        |
| 802    | CCTV Northern<br>Motorway/Western Bypass           | С      | NZTA | TNC    | 20/11/2015 |         |                    |                             |
| 807    | CCTV Johns/Clearwater                              | С      | NZTA | TNC    | 30/10/2017 |         | 1                  | 0.096                       |
| 808    | CCTV Johns/Gardiners                               | С      | NZTA | TNC    | 30/10/2017 |         | 0                  |                             |
| 809    | CCTV Johns/Wilkinsons                              | С      | NZTA | TNC    | 30/10/2017 |         | 1                  | 0.096                       |

# **Audit outcome**

| Non-compliance  | Description   |                 |                        |  |
|---|---|-----------------|------------------------|--|
| Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3  | No ICP identifier recorded against each item of load in the traffic light access database.     Five items of load with no GXP recorded  Potential impact: None  Actual impact: None  Audit history: Twice   |                 |                        |  |
| From/to: entire audit period  | Controls: Moderate  |                 |                        |  |
|   | Breach risk rating: 2   |                 |                        |  |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |  |
| Low   | The controls are rated as moderate, because there is sufficient information to correctly link each item of load to an ICP.  The impact is rated as none as there is no affect on the submission GENE makes. |                 |                        |  |
| Actions taker   | n to resolve the issue  | Completion date | Remedial action status |  |
| Genesis will contact CCT and discuss the content of this audit, with the intent of improving both database and data reporting to Genesis. |   | 12/2018         | Unknown                |  |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date |                        |  |
| Genesis will make recommendations with the intent to improve CCT's current processes  |   | 12/2018         |                        |  |

# 2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

#### **Code reference**

Clause 11(2)(b) of Schedule 15.3

#### Code related audit information

The DUML database must contain the location of each DUML item.

#### **Audit observation**

The database was checked to confirm the location is recorded for all items of load.

#### **Audit commentary**

The CTOC database contains fields for the street intersections and also GPS coordinates. There are 79 records that do not have GPS information which makes them more difficult to confirm locations, but they do have adequate street address information.

#### **Audit outcome**

Compliant

#### 2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

#### **Code reference**

Clause 11(2)(c) and (d) of Schedule 15.3

#### **Code related audit information**

The DUML database must contain:

- a description of load type for each item of load and any assumptions regarding the capacity
- the capacity of each item in watts.

#### **Audit observation**

The database was checked to confirm that they contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

#### **Audit commentary**

The traffic light access database calculates the load based on the wattage of each item of load and the burn time of each light. The burn time has been calculated based on the various light types and sequencing patterns over a 24 hour time span. The access database contains a description, behind which sits an algorithm for each traffic light type and this is used to calculate the daily kWh figure.

The algorithm for LED lanterns was calculated and added in January 2016. The council now have additional fixtures installed at traffic lights, specifically communication units. The associated load for these is currently being calculated and once confirmed will be added to the relevant traffic lights.

# **Audit outcome**

#### Compliant

# 2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

# **Code reference**

Clause 11(2A) of Schedule 15.3

# **Code related audit information**

The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.

# **Audit observation**

The field audit was undertaken of a statistical sample of 100 items of load on 25<sup>th</sup> April 2018

# **Audit commentary**

The field audit findings are detailed in the table below:

| Street                            | Database<br>count | Field<br>count | Light count differences | Wattage recorded incorrectly | Comments |
|-----------------------------------|-------------------|----------------|-------------------------|------------------------------|----------|
| CBD                               |                   |                |                         |                              |          |
| Barrington/Jerrold                | 1                 | 1              |                         |                              |          |
| Brougham/Collins/Jerrold/Simeon   | 1                 | 1              |                         |                              |          |
| Barrington/Xing (Moana)           | 1                 | 1              |                         |                              |          |
| Barrington/Frankleigh/Milton      | 1                 | 1              |                         |                              |          |
| Athelstan/Barrington              | 1                 | 1              |                         |                              |          |
| Barrington/Lincoln/Whiteleigh     | 1                 | 1              |                         |                              |          |
| Barbadoes/Tuam                    | 1                 | 1              |                         |                              |          |
| Barbadoes/Moorhouse/Waltham       | 1                 | 1              |                         |                              |          |
| Barbadoes/Ferry                   | 1                 | 1              |                         |                              |          |
| Barbadoes/St Asaph                | 1                 | 1              |                         |                              |          |
| Barbadoes/Lichfield               | 1                 | 1              |                         |                              |          |
| Barbadoes/Cashel                  | 1                 | 1              |                         |                              |          |
| Barbadoes/Hereford                | 1                 | 1              |                         |                              |          |
| Barbadoes/Worcester               | 1                 | 1              |                         |                              |          |
| Barbadoes/Gloucester              | 1                 | 1              |                         |                              |          |
| Armagh/Barbadoes                  | 1                 | 1              |                         |                              |          |
| Barbadoes/Kilmore                 | 1                 | 1              |                         |                              |          |
| Barbadoes/Bealey                  | 1                 | 1              |                         |                              |          |
| Barbadoes/Edgeware                | 1                 | 1              |                         |                              |          |
| Fitzgerald/Gloucester             | 1                 | 1              |                         |                              |          |
| Falsgrave/Fitzgerald/Moorhouse    | 1                 | 1              |                         |                              |          |
| Fitzgerald/St Asaph               | 1                 | 1              |                         |                              |          |
| Fitzgerald/Tuam                   | 1                 | 1              |                         |                              |          |
| Fitzgerald/Lichfield              | 1                 | 1              |                         |                              |          |
| Cashel/Fitzgerald                 | 1                 | 1              |                         |                              |          |
| Fitzgerald/Hereford               | 1                 | 1              |                         | _                            |          |
| Fitzgerald/Worcester              | 1                 | 1              |                         |                              |          |
| Armagh/Fitzgerald                 | 1                 | 1              |                         |                              |          |
| Avonside/Fitzgerald/Kilmore       | 1                 | 1              |                         |                              |          |
| Bealey/Fitzgerald/London/Whitmore | 1                 | 1              |                         |                              |          |

| Gloucester/Montreal             | 1 | 1          |  |  |
|---------------------------------|---|------------|--|--|
| Gloucester/Rolleston            | 1 | 1          |  |  |
| Gloucester/Manchester           | 1 | 1          |  |  |
| Cambridge/Durham/Gloucester     | 1 | 1          |  |  |
| Gloucester/Linwood              | 1 | 1          |  |  |
| Gloucester/Latimer/Madras       | 1 | 1          |  |  |
| Gloucester/Stanmore             | 1 | 1          |  |  |
| Gloucester/Woodham              | 1 | 1          |  |  |
| Colombo/Salisbury               | 1 | 1          |  |  |
| Colombo/Xing (Wherstead)        | 1 | 1          |  |  |
| Colombo/Xing (Fisher)           | 1 | 1          |  |  |
| Colombo/Tennyson                | 1 | 1          |  |  |
| Colombo/Strickland              | 1 | 1          |  |  |
| Beaumont/Colombo                | 1 | 1          |  |  |
| Colombo/Huxley/Milton           | 1 | 1          |  |  |
| Colombo/Xing (Hastings)         | 1 | 1          |  |  |
| Brougham/Colombo                | 1 | 1          |  |  |
| Colombo/Wordsworth              | 1 | 1          |  |  |
| Battersea/Colombo               | 1 | 1          |  |  |
| Byron/Colombo/Sandyford         | 1 | 1          |  |  |
| Colombo/Moorhouse               | 1 | 1          |  |  |
| Colombo/St Asaph                | 1 | 1          |  |  |
| Colombo/Tuam                    | 1 | 1          |  |  |
| Colombo/Lichfield               | 1 | 1          |  |  |
| Cashel/Colombo                  | 1 | 1          |  |  |
| Colombo/Hereford                | 1 | 1          |  |  |
| Colombo/Gloucester              | 1 | 1          |  |  |
| Armagh/Colombo                  | 1 | 1          |  |  |
| Colombo/Kilmore                 | 1 | 1          |  |  |
| Bealey/Colombo                  | 1 | 1          |  |  |
| Colombo/Edgeware                | 1 | 1          |  |  |
| Colombo/Xing (Cycleway S Canon) | 1 | 1          |  |  |
| Outer Streets                   | 1 | _ <u>+</u> |  |  |
| Ferry/Hargood/Radley            | 1 | 1          |  |  |
| Bridal Path/Ferry/Main Road     | 1 | 1          |  |  |
|                                 | 1 | 1          |  |  |
| Ferry/Humphreys                 | 1 | 1          |  |  |
| Ferry/Palinurus/Rutherford      | 1 | 1          |  |  |
| Ferry/Xing                      | 1 | 1          |  |  |
| Aldwins/Ensors/Ferry            | 1 | 1          |  |  |
| Ferry/Moorhouse/Wilsons         | 1 | 1          |  |  |
| Ferry/Fitzgerald                | 1 | 1          |  |  |
| Montreal/Salisbury/Victoria     | 1 | 1          |  |  |
| Madras/Salisbury                | 1 | 1          |  |  |
| Durham/Salisbury                | 1 | 1          |  |  |
| Manchester/Salisbury            | 1 | 1          |  |  |
| Barbadoes/Salisbury             | 1 | 1          |  |  |

| Masham/Russley/Yaldhurst                           | 1 | 1 |  |                               |
|--|---|---|--|-------------------------------|
| Curletts/Peer/Yaldhurst                            | 1 | 1 |  |                               |
| Avonhead/Middlepark/Yaldhurst                      | 1 | 1 |  |                               |
| CCTV Pound/West Coast/Yaldhurst                    | 1 | 1 |  |                               |
| SZ Yaldhurst Model School (School)                 | 2 | 2 |  |                               |
| CCTV Harewood/Johns/Russley                        | 1 | 1 |  |                               |
| Memorial/Russley                                   | 1 | 1 |  |                               |
| SZ Russley School (Cutts)                          | 1 | 1 |  |                               |
| Marshland/New Brighton/North Parade/Shirley        | 1 | 1 |  |                               |
| Shirley/Xing                                       | 1 | 1 |  |                               |
| North Avon/North Parade                            | 1 | 1 |  | Lights not in service         |
| Averill/North Parade                               | 1 | 1 |  |                               |
| North Parade/Xing (Shirley Boys HS/Marian College) | 1 | 1 |  |                               |
| CCTV Johns/Clearwater                              | 1 | 1 |  |                               |
| Johns/Main North                                   | 1 | 1 |  |                               |
| CCTV Johns/Gardiners                               | 0 | 0 |  | To be confirmed not connected |
| CCTV Johns/Sawyers Arms                            | 1 | 1 |  |                               |
| CCTV Johns/Wilkinsons                              | 1 | 1 |  |                               |
| Hargood/Keighleys/Linwood                          | 1 | 1 |  |                               |
| Marshland/Palms                                    | 1 | 1 |  |                               |
| Briggs/Lake Terrace/Marshland                      | 1 | 1 |  |                               |
| Homebase/Marshland                                 | 1 | 1 |  |                               |
| Marshland/QEII                                     | 1 | 1 |  |                               |
| Mairehau/Marshland                                 | 1 | 1 |  |                               |
| Marshland/Prestons                                 | 1 | 1 |  |                               |

I did not identify any load missing from the database.

#### **Audit outcome**

Compliant

# 2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

#### **Code reference**

Clause 11(3) of Schedule 15.3

#### **Code related audit information**

The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

## **Audit observation**

The process for tracking of changes in the database was examined.

# **Audit commentary**

Any changes that are made during any given month take effect from the beginning of that month.

On September 20<sup>th</sup> 2012, the Authority sent a memo to Retailers and auditors advising that tracking of load changes at a daily level was not required as long as the database contained an audit trail. I have interpreted this to mean that the production of a monthly "snapshot" report is sufficient to achieve compliance.

For new traffic light connections, the process is well defined and requires paperwork to be completed before each job can progress to next stage. Once accepted an "as built" is provided. This includes a check for the correct NSP to allocate it to. The access database is updated only once all paperwork is returned and completion is confirmed. New traffic lights are commissioned by CTOC, the traffic lights must be programmed before they will start working. Therefore, all new lights will be captured in the month of connection.

The city rebuild continues and as part of that existing traffic lights are turned off as roading repairs continue, but these are not made inactive in the database therefore in these instances over submission will be occurring. The over submission is recorded as a non-compliance in 2.1 above, and the lack of accurate load tracking is recorded as non-compliance below.

#### **Audit outcome**

| Non-compliance  | Description   |                 |                        |  |
|---|---|-----------------|------------------------|--|
| Audit Ref: 2.6  | Disconnected traffic lights not tracked in the database   |                 |                        |  |
| With: Clause 11(3) of   | Potential impact: Low   |                 |                        |  |
| Schedule 15.3   | Actual impact: Low  |                 |                        |  |
|   | Audit history: Twice  |                 |                        |  |
|   | Controls: Moderate  |                 |                        |  |
| From/to: entire audit period  | 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 rated as low as there is a nominal effect on the submission GENE |                 |                        |  |
|   | makes.  |                 |                        |  |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |  |
| Genesis will contact CCT and discuss the content of this audit, with the intent of improving both database and data reporting to Genesis. |   | 12/2018         | Unknown                |  |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date |                        |  |
| Genesis will make recommendations with the intent to improve CCT's current processes  |   | 12/2018         |                        |  |

# 2.7. Audit trail (Clause 11(4) of Schedule 15.3)

#### **Code reference**

Clause 11(4) of Schedule 15.3

#### **Code related audit information**

The DUML database must incorporate an audit trail of all additions and changes that identify:

- the before and after values for changes
- the date and time of the change or addition
- the person who made the addition or change to the database

#### **Audit observation**

The database was checked for audit trails.

#### **Audit commentary**

CTOC maintain an Access database, there is no audit trail of additions and changes to the database information. However historic reports are able to be compared for a clear picture of any changes made from one month to the next.

#### **Audit outcome**

| Non-compliance   | Description   |                                 |                        |  |
|--|---|---------------------------------|------------------------|--|
| Audit Ref: 2.7   | No audit trail of changes made in the access database.  |                                 |                        |  |
| With: Clause 11(4) of  | Potential impact: Low   |                                 |                        |  |
| Schedule 15.3  | Actual impact: Low  |                                 |                        |  |
|  | Audit history: Twice  |                                 |                        |  |
| From/to: entire audit period   | Controls: Moderate  |                                 |                        |  |
| periou   | Breach risk rating: 2   |                                 |                        |  |
| Audit risk rating  | Ratio   | 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 rated as none as there is no effect on the submission GENE makes.   |                                 |                        |  |
| Actions taken to resolve the issue Completion date Remedial action sta                 |   |                                 | Remedial action status |  |
| Genesis will contact CCT a<br>audit, with the intent of in<br>processes and data repor |   | 12/2018                         | Unknown                |  |
| Preventative actions taken to ensure no further issues will occur                      |   | Completion date                 |                        |  |
| Genesis will make recommendations with the intent to improve CCT's current processes   |   | 12/2018                         |                        |  |

#### 3. ACCURACY OF DUML DATABASE

#### 3.1. Database accuracy (Clause 15.2 and 15.37B(b))

#### **Code reference**

Clause 15.2 and 15.37B(b)

#### **Code related audit information**

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

#### **Audit observation**

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

| Plan Item           | Comments   |  |
|---------------------|--|--|
| Area of interest    | Christchurch City Council Unmetered Traffic Lights   |  |
| Strata              | The database contains 368 items of load in the CCC area.   |  |
|                     | The processes for the management of 368 items of load are the same, but I decided to place the items of load into two strata, as follows:  |  |
|                     | 1. CBD   |  |
|                     | 2. Outer Streets   |  |
| Area units          | I created a pivot table of the traffic light database and I used a random number generator. In order of the random number assigned, I then searched for and selected any traffic lights in associated streets with each of the top random numbers until I had a total of 100 subunits. |  |
| Total items of load | 100 items of load were checked.  |  |

I checked 100 traffic light locations and all were confirmed correct.

# **Audit commentary**

The database was found to contain zero inaccuracies.

The field data was 100% of the database data for the sample checked. The total wattage recorded in the database for the sample was 819 watts. The total wattage found in the field for the sample checked was 819 watts, no difference of watts. This will result in no submission of difference.

#### **Audit outcome**

Compliant

#### 3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

#### **Code reference**

Clause 15.2 and 15.37B(c)

#### **Code related audit information**

The audit must verify that:

- volume information for the DUML is being calculated accurately
- profiles for DUML have been correctly applied.

#### **Audit observation**

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that the ICP has the correct profile and submission flag
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

#### **Audit commentary**

Submission for March 2018 was not based on the database information, as explained in section 2.1.

I recalculated the submission for March 2018 using CTOC's Power Invoice Listing for the March period and believe there was an under submission of 1,268.42 kWh for the period.

#### **Audit outcome**

| Non-compliance  | Description  |                 |                        |
|---|--|-----------------|------------------------|
| Audit Ref: 3.2<br>With: Clause 15.2 and<br>15.37B(c)  | Under submission for the March 2018 period due to the incorrect monthly report being used to calculate the submission.  Potential impact: Low  Actual impact: Low  Audit history: Once |                 |                        |
| From: 01 March 18   | Controls: Moderate   |                 |                        |
| To: 31 March 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 submission information is correct most of the time.   |                 |                        |
|   | The impact is rated as low due to the kWh.   |                 |                        |
| Actions take  | n to resolve the issue   | Completion date | Remedial action status |
| Genesis will contact CCT and discuss the content of this audit, with the intent of improving both database and data reporting to Genesis. |  | 12/2018         | Unknown                |
| Preventative actions tak  | en to ensure no further issues will occur  | Completion date |                        |

| Genesis will make recommendations with the intent to improve CCT's current processes | 12/2018 |  |
|--|---------|--|
|--|---------|--|

# CONCLUSION

The Christchurch City Council's – Christchurch Transport Operation Centre (**CTOC**) manage an access database for Unmetered Traffic Lights. An audit of the DUML database and processes was conducted at the request of Genesis Energy Limited.

The audit found five non-compliances and makes no recommendations.

The field audit found no discrepancies.

The database accuracy is assessed to be 100% indicating no over or under submission but there was a discrepancy found with the March 2018 submission.

The future risk rating of ten indicates that the next audit be completed in 12 months.

# PARTICIPANT RESPONSE

Genesis endeavour working with CCT to improve upon the database and processes currently in place. Timing of the report and June  $\mathbf{1}^{\text{st}}$  deadline has meant Genesis is yet to discuss the audit findings. Genesis will over the coming months be working with contracted parties to improve on database content.