

ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



VERITEK

For

WESTERN BAY OF PLENTY DISTRICT  
COUNCIL  
AND GENESIS ENERGY LIMITED

Prepared by: Rebecca Elliot

Date audit commenced: 18 June 2018

Date audit report completed: 17 July 2018

Audit report due date: 01-Jun-18

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## EXECUTIVE SUMMARY

This audit of the Western Bay of Plenty District Council (**WBOP DC**) DUMML 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 DUMML 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. A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The field work is carried out by Horizon. The asset data capture and database population is conducted by Westlink.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was last changed in June 2014. A monthly report detailing the number of lights and lamp wattage is provided each month by Westlink, but this does not include any ballast information and is therefore not used.

This audit has been undertaken after the June 1<sup>st</sup>, 2018 deadline as WBOP DC were undertaking a 100% field audit which was completed at the end of May 2018.

The field audit was undertaken of a statistical sample of 197 items of load on 2<sup>nd</sup> July 2018.

The audit found five non-compliances and makes one recommendation.

Under submission is occurring by approximately 11,247 kWh per annum.

The future risk rating of 19 indicates that the next audit be completed in three months. The matters raised are detailed below:

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
DUML Audit	1.10	17.295F of part 17	Audit not completed within 12 month of Part 16A coming into effect.	Moderate	Low	2	Cleared
Deriving submission information	2.1	11(1) of Schedule 15.3	Net under submission of an estimated 11,247 kWh per annum.	Weak	Medium	6	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	Four lights not included in the database extract used for submission.  New lights are not added to the database for reconciliation in the month they are vested to council.	Moderate	Low	2	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	The database accuracy is assessed to be 100.6% indicating an estimated under submission of 1,100 kWh per annum.	Weak	Low	3	Identified
Volume information accuracy	3.2	15.2 and 15.37B(c)	Net under submission of an estimated 11,247 kWh per annum.	Weak	Medium	6	Identified
<b>Future Risk Rating</b>						<b>19</b>	

<b>Future risk rating</b>	0	1-4	5-8	9-15	16-18	19+
<b>Indicative audit frequency</b>	36 months	24 months	18 months	12 months	6 months	3 months

### RECOMMENDATIONS

Subject	Section	Description	Recommendation
Tracking of load change	2.6	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	Identified

## ISSUES

Subject	Section	Description	Issue
		Nil	

## 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

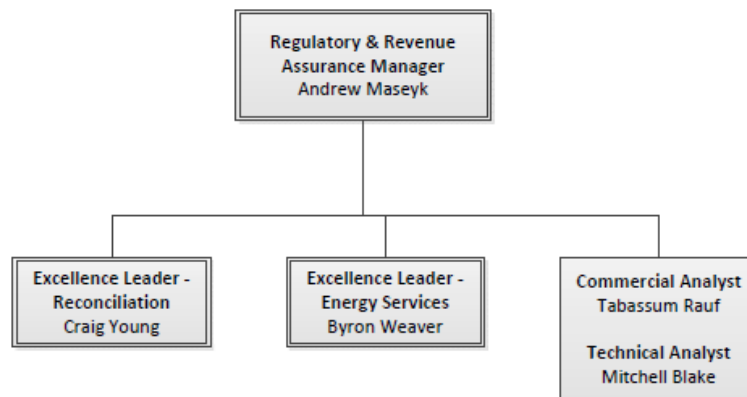
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

#### Audit commentary

There are no exemptions in place relevant to the scope of this audit.

### 1.2. Structure of Organisation

Genesis provided a copy of their organisational structure.



### 1.3. Persons involved in this audit

Auditor:

**Rebecca Elliot**

**Veritek Limited**

**Electricity Authority Approved Auditor**

Other personnel assisting in this audit were:

Name	Title	Company
Craig Young	Excellence Leader - Reconciliation	Genesis Energy
Grace Hawken	Technical Specialist - Reconciliation Team	Genesis Energy
Paul Anderson	Asset Management Leader	Westlink BOP
Phillip Barnes	Maintenance Manager	Westlink BOP

#### 1.4. Hardware and Software

The SQL database used for the management of DUMML is remotely hosted by RAMM Software Ltd. The database is commonly known as “RAMM” which stands for “Roading Asset and Maintenance Management”.

Westlink confirmed that the database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

#### 1.5. Breaches or Breach Allegations

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

#### 1.6. ICP Data

ICP Number	Description	Profile	Number of items of load	Database wattage (watts)
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	UNM	531	46,870

#### 1.7. Authorisation Received

All information was provided directly by Genesis or Westlink.

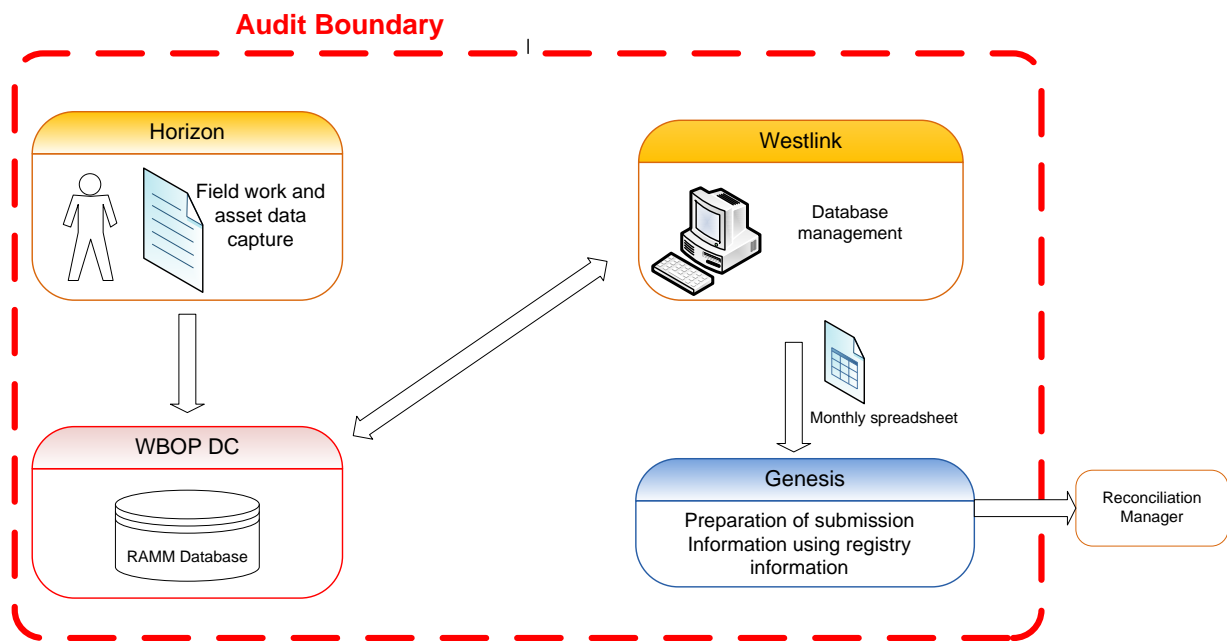
#### 1.8. Scope of Audit

This audit of the Western Bay of Plenty District Council (**WBOP DC**) DUMML database and processes was conducted at the request of Genesis 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 DUMML audits version 1.1, which became effective on 1 June 2017.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was last changed in June 2014. A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. A monthly report detailing the number of lights and lamp wattage is provided each month by Westlink, but this does not include any ballast information and is therefore not used.

The database is remotely hosted by RAMM Software Ltd. The field work is carried out by Horizon. The asset data capture and database population are conducted by Westlink. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information. The diagram below shows the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 197 items of load on 2<sup>nd</sup> July 2018.

### 1.9. Summary of previous audit

This is the first audit of this database undertaken by Genesis.

### 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 three 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. Genesis were unable to complete this audit by the required timeframe as Westlink were undertaking a 100% field audit and therefore the database extract was not able to be provided before this audit's due date.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 Clause 17.295F of part 17  From: 01-Jun-18 To: 02-Jul-18	Audit not completed within 12 month of Part 16A coming into effect.  Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate, as Genesis are reliant on the database provider to supply the data and in this case the delay caused this report to be late.  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
Genesis has obtained contact information and developed communication channels, for the contracted party to deliver the monthly database information.		01/07/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue supporting the contracted party, reviewing the information provided and reporting back any anomalies for correction at the source. in		01/07/2018	

## 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 DUML load using the UML profile. Genesis receive a monthly wattage report, but this does not include the lamp ballast but as noted in **section 2.4** it is present in the database, therefore it is the registry daily kWh figure that is used to derive submission. I compared the submission volumes with the load recorded in the database extract against the volumes submitted by Genesis for the month of June 2018 and found that the registry figure is lower than the database wattage figure:

ICP Number	Description	June kWh submission	RAMM estimated June kWh submission	Estimated kWh June difference
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	15,887	16,372.59	- 845.59

Volume inaccuracy is present as follows:

Issue	Estimated volume information impact (annual kWh)
The registry kWh figure vs database extract figure was compared and found a variance (see table above). I have annualised this to indicate the estimated impact on reconciliation.	10,147 under submission
The field data was 100.6% of the database data for the sample checked. This will result in estimated under submission of 1,100 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).	1,100 under submission
<b>Net impact</b>	<b>11,247 under submission</b>

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3  From: 01-Jun-17 To: 30-Jun-18	Net under submission of an estimated 11,247 kWh per annum.  Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	The controls are rated as weak as the RAMM database is not used for reconciliation.  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
Genesis has reviewed the information being supplied and have found that the information does not contain the ballast/gear wattage within the summary reporting.		01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to review the parties reporting and request detailed level reporting for transparency. Genesis will take steps to correct volumes settled with the 14 months revisions and for future settlement/billing periods.		01/10/2018	

## 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 DUMML database must contain:*

- *each ICP identifier for which the retailer is responsible for the DUMML*
- *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 items of load have an ICP recorded against them.

### Audit outcome

Compliant

### 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 databases were checked to confirm the location is recorded for all items of load.

#### **Audit commentary**

The database contains fields for the street address and also GPS coordinates.

#### **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 it 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 database contains the manufacturers rated wattage and the ballast wattage. The extract provided has fields for lamp and gear make and model, and all were populated. The accuracy of the lamp description, capacity and ballasts recorded is discussed in **section 3.1**.

#### **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 197 items of load on 2<sup>nd</sup> July 2018.

### Audit commentary

The field audit findings for the sample of lamps are detailed in the table below:

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
<b>New</b>					
REEL ROAD EXTENTION	0	3	3		All lights are electrically connected but not yet vested to council.
<b>Existing</b>					
ADELA STEWART DRIVE	1	1			
ANGUS LANE	1	1			
ANZAC BAY RESERVE ROAD	4	3	-1		1x 150W HPS not found in the field.
ATHENREE HEIGHTS	9	9			
BOWENTOWN BOULEVARD	18	18			
BREAKERS CRESCENT	2	2			
BROWNS DRIVE	10	10			
DIDSBURY DRIVE	3	3			
DILLON STREET	18	18			
DOLPHIN AVENUE	1	1			
EDINBURGH STREET	5	5			
ELIZABETH STREET	1	1			
FARM ROAD	1	1			
FYFE ROAD	7	7			
GLEN ISLA PLACE	2	2			
HEREFORD PLACE	3	3			
HILLARY STREET	1	1			
HINEMOA ROAD	3	3			
JENKINSON STREET	3	3			
MAKO AVENUE	1	1			
MERMAID PLACE	1	1			
POHUTUKAWA DRIVE	8	8			

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
QUEEN STREET (WAIHI BEACH)	2	2			
RALPH LANE	5	5			
REEL ROAD EXTENSION	3	3			
RORETANA DRIVE	7	7			
SANDLEIGH DRIVE	6	6			
SAVAGE AVENUE	5	5			
SCOTT STREET	1	1			
SEA CREST PLACE	2	2			
SEA VISTA	3	3			
SEAVIEW ROAD	4	4			
SNELL CRESCENT	7	7			
TATAI ROAD	4	4			
TE KANAWA PLACE	2	2			
THE TERRACE	3	3			
TOHORA VIEW	6	6			
TUHUA PLACE	3	3			
WALLNUTT AVENUE	4	4			
WILSON ROAD (WAIHI BEACH)	27	28	1		1x additional 70W HPS found in the field.
<b>GRAND TOTAL</b>	<b>197</b>	<b>200</b>	<b>5</b>		

This clause relates to lights in the field that are not recorded in the database. The field audit found four additional lights. Three of the light count discrepancies relate to new lights that are yet to be vested to the council. These were checked in the field at night and were found to be electrically connected. This is recorded as non-compliance.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: unknown To: 02-Jul-18	Four lights not included in the database extract used for submission.  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		
<b>Low</b>	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
Genesis are working with the contracted party to gain accuracy within the database.		01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has advised the party of the missing records and have requested the database to be updated.		01/10/2018	

## 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

On 20<sup>th</sup> September 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. The database tracks additions and removals as required by this clause.

The process to add new streetlights was examined. WBOP DC approves all new developments and the consent is provided once they are satisfied that the development will meet the required standards. Detailed “as built” are required to be provided by the developer and a walk over of the development is undertaken before the 224 certificate is issued. This is needed before the titles can be issued to the developer. It appears that streetlights are getting electrically connected prior to the issuing of the 224 certificate and therefore before the street lights are vested to council and included in the database extract for submission. This is recorded as non-compliance in **sections 2.1, 2.5, 3.1 and 3.2**. I recommend that Genesis and WBOP DC work with the Distributor to determine the most effective process to ensure the volumes associated with these lights are reconciled.

Description	Recommendation	Audited party comment	Remedial action
Tracking of load change	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	Genesis will have the discussion as to how all parties can gain efficiencies within the “As built” process	Identified

New lights are required to be added to the database by the 20<sup>th</sup> of the month following them being vested. This will result in no submission for the first month of new lights being added if the RAMM database extract was used for submission. This delay in the tracking of load change process is recorded as non-compliance in **sections 2.5 and 3.1**.

Horizon carries out the field maintenance for Westlink on behalf of WBOP DC and they update RAMM directly. Westlink have robust controls in their contract with Horizon and this ensures that field maintenance is captured in a timely and accurate manner. Outage patrols are in place with the whole network being checked each month. Additional to this Westlink undertake a 20% validation of all assets they are responsible for on an annual basis.

WBOP DC are planning to roll out LED lights, but this is some time away from being deployed.

There are no festive lights are connected to the unmetered streetlight circuits and there are no private lights known of.

**Audit outcome**

Compliant

**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 DUMML 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**

The database has a complete audit trail.



**Audit outcome**

Compliant

### 3. ACCURACY OF DUMML 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 DUMML database is complete and accurate.

##### Audit observation

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

Plan Item	Comments
Area of interest	Western BOP DC Street Lights in the Waihi area
Strata	The databases contain 531 items of load in the Western BOP DC area.  The processes for the management of all WBOPDC items of load is the same. I selected the following strata: <ul style="list-style-type: none"><li>• New</li><li>• Existing</li></ul>
Area units	I created a pivot table of the roads in each database and used a random number generator in each spreadsheet to select a total of 41 sub-units.
Total items of load	197 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority.

##### Audit commentary

The database was checked against the published standardised wattage table and confirmed that ballasts applied and lamp descriptions were correct.

As discussed in **section 2.6**, new lights are required to be added to the database by the 20<sup>th</sup> of the month following them being vested. This will result in no submission for the first month of new lights being added if the RAMM database extract was used for submission. This delay in the tracking of load change process is recorded as non-compliance below.

The field data was 100.6% of the database data for the sample checked. The statistical sampling tool reported with 95% confidence the precision of the sample was 5.2% and the true load in the field will be between 96.8% to 102% of the load recorded in the database.

There will be approximately 1,100 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUMML database auditing tool) of under submission. The statistical sampling tool reported with 95% confidence the estimated impact will be between 6,400 kWh per annum over submission and 39,000 kWh per annum under submission. As detailed in **sections 2.5** and **2.6**, this variance is largely due to new lights being electrically connected but not included in the database for reconciliation.

##### Audit outcome

## Non-compliant

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 100.6% indicating an estimated under submission of 1,100 kWh per annum. 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: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	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 low, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to work with WBoP to gain accuracies within the database, ensuring completeness.		01/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will support WBoP with any process improvements required.		01/12/2018	

### 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

Genesis reconciles this DUML load using the UML profile. Genesis receive a monthly wattage report, but this does not include the lamp ballast but as noted in **section 2.4** it is present in the database, therefore it is the registry daily kWh figure that is used to derive submission. I compared the submission volumes with the load recorded in the database extract against the volumes submitted by Genesis for the month of June 2018 and found:

ICP Number	Description	June submission	RAMM estimated June submission	Estimated June difference
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	15,887	16,372.59	- 845.59

Volume inaccuracy is present as follows:

Issue	Estimated volume information impact (annual kWh)
The registry kWh figure vs database extract figure was compared and found a variance (see table above). I have annualised this to indicate the estimated impact on reconciliation	10,147 under submission
The field data was 100.6% of the database data for the sample checked. This will result in estimated under submission of 1,100 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).	1,100 under submission
<b>Net impact</b>	<b>11,247 under submission</b>

### Audit outcome

Non-compliant

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 11,247 kWh per annum.  Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	The controls are rated as weak as the RAMM database is not used for reconciliation.  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
Genesis has reviewed the information being supplied and have found that the information does not contain the ballast/gear wattage within the summary reporting.		01/10/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to review the parties reporting and request detailed level reporting for transparency. Genesis will take steps to correct volumes settled with the 14 months revisions and for future settlement/billing periods.		01/10/2018	

## CONCLUSION

A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The field work is carried out by Horizon. The asset data capture and database population is conducted by Westlink.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was last changed in June 2014. A monthly reporting detailing the number of lights and lamp wattage is provided each month by Westlink, but this does not include any ballast information and is therefore not used.

This audit has been undertaken after the June 1<sup>st</sup>, 2018 deadline as WBOP DC were undertaking a 100% field audit which was completed at the end of May 2018.

The field audit was undertaken of a statistical sample of 197 items of load on 2<sup>nd</sup> July 2018.

The audit found five non-compliances and makes one recommendation.

Under submission is occurring by approximately 11,247 kWh per annum.

The future risk rating of 19 indicates that the next audit be completed in three months.

## PARTICIPANT RESPONSE

Genesis will continue to develop relationships with the contracted parties to ensure all information is being supplied. Genesis are reliant on 3<sup>rd</sup> parties of the contracted party to deliver and maintain the field information pertaining to the WBoP streetlighting.