## Compliance plan for Upper Hutt City Council Distributed Unmetered Load for Contact Energy Limited

Title: Deriving Submiss	ion Information
Non-compliance	Description
Audit Ref: 2.1	The database used to prepare submissions contains some inaccurate information.
With: Clause 11(1) of Schedule 15.3	<ul> <li>The database accuracy is assessed to be 96.6% indicating an estimated over submission of 1,405 kWh per annum.</li> <li>109 lamps have incorrect ballast wattage recorded, and the errors will result in estimated under submission of 598 watts or 2,554 kWh per annum.</li> <li>One lamp has missing wattage information. The expected wattage is 103 and expected under reporting is 439 kWh per annum.</li> </ul>
	Incorrect profiles are recorded on the registry.
	Potential impact: Low
From: unknown	Actual impact: Low
To: 06-Apr-18	Audit history: Twice previously
	Controls: Moderate
	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 assessed to be low, based on the kWh differences described above. Profiles were recorded correctly on the registry for most of the audit period.

Actions taken to resolve the issue	Completion date	Remedial action status
Database accuracy impacting derivation of submission information Contact acknowledges that the database has some inaccurate records impacting the derivation of submission information and is working with UHCC to address these individual records issues caused in part by the mass deployment of LED streetlights replacing the legacy equipment. UHCC will undertake a clean-up of database anomalies as their LED mass deployment winds down	July 2018	Identified
Incorrect profiles on Registry Contact will reinstate the manual correction of profile code on business day 4 of each month so that our Submissions are correct There is a Change Request raised to have this issue fixed but this has not been approved yet		
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

Title: All load recorded	Fitle: All load recorded in database		
Non-compliance	Description		
Audit Ref: 2.4 With: Clauses 11(2)(c) and (d) of Schedule 15.3 From: unknown To: 03-Apr-18	One lamp has some missing make and model information and no lamp wattage recorded.  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 because only one of the 4092 lamps in the database had missing make, model and wattage information.  The impact is low, the expected wattage for the lamp type is 103W.		
Actions ta	ken to resolve the issue	Completion Remedial action status	
inaccurate records imp	that the database has some acting the derivation of submission king with UHCC to address this	he derivation of submission	

Preventative actions taken to ensure no further issues will occur	Completion date
As above	As above

Title: Database accurac	су		
Non-compliance	Desc	cription	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	estimated over submission o  109 lamps have incorrect bal will result in estimated unde per annum.  One lamp has missing wattag is 103 and expected under repotential impact: Low  Actual impact: Low	nissions contains some inaccurate sessed to be 96.6% indicating an	
_	Audit history: None		
From: unknown	Controls: Moderate		
To: 03-Apr-18  Audit risk rating	Breach risk rating: 2	audit risk rating	_
Low	The controls are rated as moderate, that lamp information is correctly re-	because they are sufficient to ensure	
Actions ta	ken to resolve the issue	Completion date	Remedial action status
inaccurate records implinformation and is world individual records issue deployment of LED streequipment. UHCC will to	that the database has some acting the derivation of submission king with UHCC to address these as caused in part by the mass etlights replacing the legacy undertake a clean-up of database mass deployment winds down	July 2018	Identified
Preventative actions to	aken to ensure no further issues will occur	Completion date	
As above		As above	

Title: Volume informat	le: Volume information accuracy			
Non-compliance	Description			
Audit Ref: 3.2	The database used to prepare submi information.	to prepare submissions contains some inaccurate		
With: Clause 15.2 and 15.37B(c)	<ul> <li>estimated over submission o</li> <li>109 lamps have incorrect bawill result in estimated unde per annum.</li> <li>One lamp has missing wattag</li> </ul>	assessed to be 96.6% indicating an on of 1,405 kWh per annum. ballast wattage recorded, and the errors of submission of 598 watts or 2,554 kWh tage information. The expected wattage of reporting is 439 kWh per annum.		
	Incorrect profiles are recorded on th	e registry.		
	Potential impact: Low			
	Actual impact: Low			
	Audit history: None			
From: unknown	Controls: Moderate			
To: 06-Apr-18	Breach risk rating: 2			
Audit risk rating	Rationale for	audit risk rating		
Low	that lamp information is correctly re- The impact is assessed to be low, bas	because they are sufficient to ensure corded most of the time. sed on the kWh differences described ctly on the registry for most of the audit		
Actions ta	ken to resolve the issue	Completion date	Remedial action status	
information Contact acknowledges inaccurate records imp information and is work individual records issue deployment of LED stre equipment. UHCC will u anomalies as their LED  Incorrect profiles on Re Contact will reinstate the	that the database has some acting the derivation of submission king with UHCC to address these as caused in part by the mass eetlights replacing the legacy undertake a clean-up of database mass deployment winds down egistry the manual correction of profile code ach month so that our Submissions	July 2018	Identified	
are correct There is a Change Requ but this has not been a	est raised to have this issue fixed pproved yet			

Preventative actions taken to ensure no further issues will occur	Completion date
As above	As above