

# Compliance plan for Upper Hutt City Council Distributed Unmetered Load for Contact 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: unknown To: 06-Apr-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> <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> <p>Incorrect profiles are recorded on the registry.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</p> <p>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.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>Database accuracy impacting derivation of submission information</b>  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</p> <p><b>Incorrect profiles on Registry</b>  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</p>	July 2018	Identified
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
As above	As above	

Title: All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.4  With: Clauses 11(2)(c) and (d) of Schedule 15.3  From: unknown  To: 03-Apr-18</p>	<p>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</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>Low</b></p>	<p>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.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact acknowledges that the database has some inaccurate records impacting the derivation of submission information and is working with UHCC to address this individual record issue	July 2018	Identified

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

Title: Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 03-Apr-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> <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> <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	
<b>Low</b>	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
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
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	

<b>Title: Volume information accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 06-Apr-18</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> <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> <p>Incorrect profiles are recorded on the registry.</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>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</p> <p>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.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
<p><b>Database accuracy impacting derivation of submission information</b></p> <p>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</p> <p><b>Incorrect profiles on Registry</b></p> <p>Contact will reinstate the manual correction of profile code on business day 4 of each month so that our Submissions are correct</p> <p>There is a Change Request raised to have this issue fixed but this has not been approved yet</p>	July 2018	Identified

<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
As above	As above	