

## Compliance plan for Waikato DC DUML –November 2018

| Deriving submission information  |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| Audit Ref: 2.1<br>With: Clause 11(1) of Schedule 15.3<br><br>From: 01-May-18<br>To: 31-Oct-18  | Analysis of the database found 13 lamps with the incorrect LED wattage recorded indicating an estimated minor under submission of 713 kWh per annum.<br><br>Potential impact: Medium<br><br>Actual impact: Low<br><br>Audit history: None<br><br>Controls: Moderate<br><br>Breach risk rating: 2 |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| <b>Low</b>   | The controls are rated as moderate as the processes in place to manage change are sufficient to mitigate risk most of the time.<br><br>The impact is assessed to be medium, based on the kWh differences.  |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| Genesis will work with Odyssey Energy Ltd to ascertain the correct lamp wattages for the 13 assets.  |  | 01/03/2019      | Identified             |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
| Genesis will be recommending a review of the tracking of load changes to ensure the correct information is being provided and updated in a timely manner |  | 01/03/2019      |                        |

| All load recorded in database  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| Audit Ref: 2.5<br>With: Clause 11(2A) of Schedule 15.3<br>From: 01-May-18<br>To: 31-Oct-18   | Two items of load are missing from the database.<br>Potential impact: Medium<br>Actual impact: Low<br>Audit history: Once previously<br>Controls: Moderate<br>Breach risk rating: 2   |                        |
| Audit risk rating  | Rationale for audit risk rating   |                        |
| <b>Low</b>   | The controls are rated as moderate as the processes in place to manage change are sufficient to mitigate risk most of the time.<br>The impact is assessed to be low, based on the database accuracy as detailed in <b>section 3.1</b> . |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| Genesis will work with Odyssey Energy Ltd to ascertain the correct lamp wattages for the 13 assets.  | 01/03/2019  | Identified             |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| Genesis will be recommending a review of the tracking of load changes to ensure the correct information is being provided and updated in a timely manner | 01/03/2019  |                        |

| <b>Database accuracy</b>   |   |                               |
|--|---|-------------------------------|
| <b>Non-compliance</b>  | <b>Description</b>  |                               |
| Audit Ref: 3.1<br>With: Clause 15.2 and 15.37B(b)<br><br>From: 01-May-18<br>To: 31-Oct-18  | Analysis of the database found 13 lamps with the incorrect LED wattage recorded indicating an estimated minor under submission of 713 kWh per annum.<br><br>Potential impact: Medium<br>Actual impact: Low<br><br>Audit history: Once previously<br>Controls: Moderate<br>Breach risk rating: 2 |                               |
| <b>Audit risk rating</b>   | <b>Rationale for audit risk rating</b>  |                               |
| <b>Low</b>   | The controls are rated as moderate as the processes in place to manage change are sufficient to mitigate risk most of the time.<br><br>The impact is assessed to be low, based on the kWh value above.  |                               |
| <b>Actions taken to resolve the issue</b>  | <b>Completion date</b>  | <b>Remedial action status</b> |
| Genesis will work with Odyssey Energy Ltd to ascertain the correct lamp wattages for the 13 assets.  | 01/03/2019  | Identified                    |
| <b>Preventative actions taken to ensure no further issues will occur</b>   | <b>Completion date</b>  |                               |
| Genesis will be recommending a review of the tracking of load changes to ensure the correct information is being provided and updated in a timely manner | 01/03/2019  |                               |

| <b>Volume information accuracy</b>   |   |                               |
|--|---|-------------------------------|
| <b>Non-compliance</b>  | <b>Description</b>  |                               |
| Audit Ref: 3.2<br>With: Clause 15.2 and 15.37B(c)<br><br>From: 01-May-18<br>To: 31-Oct-18  | Analysis of the database found 13 lamps with the incorrect LED wattage recorded indicating an estimated minor under submission of 713 kWh per annum.<br><br>Potential impact: Medium<br><br>Actual impact: Low<br><br>Audit history: Once previously<br><br>Controls: Moderate<br><br>Breach risk rating: 2 |                               |
| <b>Audit risk rating</b>   | <b>Rationale for audit risk rating</b>  |                               |
| <b>Low</b>   | The controls are rated as moderate as the processes in place to manage change are sufficient to mitigate risk most of the time.<br><br>The impact is assessed to be low, based on the kWh value above.  |                               |
| <b>Actions taken to resolve the issue</b>  | <b>Completion date</b>  | <b>Remedial action status</b> |
| Genesis will work with Odyssey Energy Ltd to ascertain the correct lamp wattages for the 13 assets.  | 01/03/2019  | Identified                    |
| <b>Preventative actions taken to ensure no further issues will occur</b>   | <b>Completion date</b>  |                               |
| Genesis will be recommending a review of the tracking of load changes to ensure the correct information is being provided and updated in a timely manner | 01/03/2019  |                               |