

Compliance plan for Napier CC DUML – October 2018

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-May-18 To: 30-Sep-18</p>	<p>Under submission of approximately 102.48kWh annually due to incorrect submission calculation.</p> <p>Under submission of approximately 116,751kWh for ICP 0000939906HBEFE due to missing items of load in monthly report.</p> <p>17 items of load with no ICP resulting in an estimated under submission of 803 kWh per annum.</p> <p>40 items of load recorded with a blank-wattage, estimate of 16,571 kWh per annum.</p> <p>Potential impact: High Actual impact: High Audit history: None Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have relied on the summary of information provided on behalf of Napier CC, PSL. The summary does not identify individual lamp detail in which Genesis have requested.	01/02/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis want to analyse detailed lamp data to verify information being provided. The analysis will also provide the opportunities for feedback regarding any potential dataset errors.	01/02/2019	

ICP identifier and items of load		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 01-May-18</p> <p>To: 30-Sep-18</p>	<p>17 items of load do not have an ICP recorded resulting in an estimated 803kWh of under submission per annum.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak, as items of load are being added with no ICP recorded by the field contractor during the audit period.</p> <p>The audit risk rating is low, due to the estimated under submission of approximately 803 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are in communication with (PSL) Power solutions ltd who maintain the RAMM database. Jon Steven has just reported that he has established the Private lights are not part of the council's responsibilities and are removing them from the database. Jon has also stated that he is working through the issues identified and will keep Genesis informed of changes that are happening. The completion date is an indicative date.	01/06/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are reviewing the monthly summaries provided by PSL and have requested the RAMM data extraction to verify the information provided by PSL and the values entered by the auditor. This will provide Genesis with an overview of all information assisting in database accuracy improvements	01/02/2019	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) & (d) of Schedule 15.3</p> <p>From: 01-May-18</p> <p>To: 30-Sep-18</p>	<p>40 items of load recorded with a blank wattage, estimate of 16,571 kWh per annum.</p> <p>66 items of load with no gear wattage recorded in the database.</p> <p>Potential impact: Low</p> <p>Actual impact: None</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<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, as the correct ballasts and wattages are added to the monthly report.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Summaries provided by the third-party contractor PSL do not include null values. Therefore, Genesis was unaware of any missing information. Genesis has requested a RAMM database extraction of the detailed information assisting in identifying any potential data discrepancies.		01/06/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are reviewing the monthly summaries provided by PSL and have requested the RAMM data extraction to verify the information provided by PSL and the values entered by the auditor. This will provide Genesis with an overview of all information assisting in database accuracy improvements		01/02/2019	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-May-18</p> <p>To: 30-Sep-18</p>	<p>The ballasts in RAMM are not used for reconciliation and they are not recorded correctly in RAMM.</p> <p>17 items of load with no ICP resulting in an estimated under submission of 803 kWh per annum.</p> <p>40 items of load recorded with a blank wattage, estimate of 16,571 kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating:4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time.</p> <p>The impact is assessed to be Medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Summaries provided by the third-party contractor PSL do not include null values. Therefore, Genesis was unaware of any missing information. Genesis has requested a RAMM database extraction of the detailed information assisting in identifying any potential data discrepancies. Although the Auditor has outlined that the correct wattages with ballast included are provided in the summary report to the trader which is used for settlement. Genesis will be working with PSL to have the correct information populated in RAMM.	01/06/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are reviewing the monthly summaries provided by PSL and have requested the RAMM data extraction to verify the information provided by PSL and the values entered by the auditor. This will provide Genesis with an overview of all information assisting in database accuracy improvements.	01/02/2019	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-May-18</p> <p>To: 30-Sep-18</p>	<p>Under submission of approximately 102.48kWh annually due to incorrect submission calculation.</p> <p>Under submission of approximately 116,751kWh for ICP 0000939906HBEFE due to missing items of load in monthly report.</p> <p>17 items of load with no ICP resulting in an estimated Under submission of 803 kWh per annum.</p> <p>40 items of load recorded with blank wattage, estimate of 16,571 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis have relied on the summary of information provided on behalf of Napier CC, PSL. The summary does not identify individual lamp detail in which Genesis have requested.</p> <p>Genesis will review their process to verify the auditor's findings of the minor variances found in the submission for Sept-18</p>		01/02/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis want to analyse detailed lamp data to verify information being provided. The analysis will also provide the opportunities for feedback regarding any potential dataset errors.</p> <p>Genesis will make any relevant changes to the calculation process if found to be in error.</p>		01/02/2019	