## Compliance plan for Auckland Transport DUML October– 2018

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	Incorrect profile of RPS HHR applied to 44 ICPs.		
With:	Over submission because of dimming being used. The impact on submission is unknown.		
	Potential under submission of 847,622.56kWh due to the LED wattages being adjusted outside of RAMM and metered load recorded incorrectly against unmetered load ICPs in the RAMM database.		
	526 items of load with no wattage recorded and 27 items of load with zero wattage recorded indicating potential under submission of 66,132 kWh of under submission.		
	Incorrect ballasts recorded in RAMM indicate over submission of an estimated 8,073 kWh over submission per annum.		
	187 items of load with an invalid light	description.	
	Potential impact: High		
From: 01-May-18	Actual impact: Unknown		
To: 01-Oct-18	Audit history: Twice		
	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, as processes to improve the database accuracy have been implemented during the audit period.		
	The audit risk rating is high due to the indicative kWh variances found for those that can be quantified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact Energy have requested a fix to their systems for the incorrect profile on the registry, this is unlikely to be addressed prior to June 2019. We are manually updating the registry to ensure that settlement is correct. There can be		ETA June 2019 March 2019	Investigating
timing issues with this.			
Contact Energy have been working with AT to report accurate submission data and all submissions back to when they began with Contact Energy 1 January 2018			
Preventative actions to	aken to ensure no further issues will occur	Completion date	

Contact Energy and Veritek have explained the importance of a customer reporting accurate data and not adjusting the	ТВА	
data. Contact will work with AT to ensure their data continues		
to improve. Contact are also working with AT to use Static		
Dimming		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	526 items of load with no wattage recorded.		
With: 11(2)(c) and (d)	27 items of load with zero wattage recorded.		
of Schedule 15.3	187 items of load with an invalid light description.		
	Potential impact: High		
	Actual impact: High		
From: 30-Apr-18	Audit history: Three times		
To: 01-Oct-18	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale fo	r audit risk rating	
High	The controls are rated as moderate as the majority of the load is recorded in the RAMM database.  The audit risk rating is high if the wattage is assumed to be 28W for the lights with no wattage which results in an estimated annualised under submission of 66,132 kWh.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact Energy have requested a fix to their systems for the incorrect profile on the registry, this is unlikely to be addressed prior to June 2019. We are manually updating the registry to ensure that settlement is correct. There can be timing issues with this.		March 2019	Identified
Contact Energy have been working with AT to report accurate submission data and all submissions back to when they began with Contact Energy 1 January 2018			
There has been a large improvement in this space, from almost 8000 issues down to about 1000			
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact Energy and Veritek have explained the importance of a customer reporting accurate data and not adjusting the data. Contact will work with AT to ensure their data continues to improve. Contact are also working with AT to use Static Dimming		ТВА	

All load recorded in database			
Non-compliance	Des	cription	
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3	Not all load recorded in the database (16 additional lights found or 1.5% of the load sampled).  Potential impact: High  Actual impact: High		
From: 01-May-18	Audit history: Three times previously		
To: 01-Oct-18	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, as processes to improve the database accuracy have been implemented during the audit period.		
	The audit risk rating is high due to the impact of 1.5% variance for this large database potentially has on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact Energy will work with AT to report correct submission data and all submissions back to when they began with Contact Energy 1 January 2018		March 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact Energy and Veritek have explained the importance of a customer reporting accurate data and not adjusting the data.  Contact will work with AT to ensure their data continues to improve		ТВА	
With the review to the New Connection process these issues should be cleared			

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	187 items of load with an invalid light description.		
With: Clause 15.2 and 15.37B(b)	526 items of load with no wattage recorded and 27 items of load with zero wattage recorded indicating potential under submission of 66,132 kWh of under submission.		
	Incorrect ballasts recorded in RAMM indicate over submission of an estimated 8,073 kWh over submission per annum.		
	Potential impact: High		
	Actual impact: High		
From: 01-May-18	Audit history: Three times previously		
To: 01-Oct-18	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, as a large proportion of the incorrect ballasts have been corrected and processes being put in place will assist with recording the correct wattage is recorded.  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
Contact Energy will work with AT to report correct submission data and all submissions back to when they began with Contact Energy 1 January 2018		March 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact Energy and Veritek have explained the importance of a customer reporting accurate data and not adjusting the data. Contact will work with AT to ensure their data continues to improve		ТВА	

Volume information accuracy			
Non-compliance	Des	scription	
Audit Ref: 3.2	Incorrect profile of RPS HHR applied to 44 ICPs.		
With: 15.37B(c)	Over submission because of dimming being used. The impact on submission is unknown.		
From: 01-Apr-18 To: 31-May-18	Potential under submission of 847,622.56kWh due to the LED wattages being adjusted outside of RAMM and metered load recorded incorrectly against unmetered load ICPs in the RAMM database.		
	526 items of load with no wattage recorded and 27 items of load with zero wattage recorded indicating potential under submission of 66,132 kWh of under submission.		
	Incorrect ballasts recorded in RAMM indicate over submission of an estimated 8,073 kWh over submission per annum.		
	Unmetered ICPs incorrectly assigned to 1,022 metered items of load in the database		
	187 items of load with an invalid light	description.	
	Potential impact: High		
	Actual impact: Unknown		
	Audit history: None		
	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, as processes to improve the database accuracy have been implemented during the audit period.		
	The audit risk rating is high due to the indicative kWh variances found for those that can be quantified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact Energy have requested a fix to their systems for the incorrect profile on the registry, this is unlikely to be addressed prior to June 2019		ETA June 2019	Investigating
Contact Energy will work with AT to report correct submission data and all submissions back to when they began with Contact Energy 1 January 2018		March 2019	
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact Energy and Veritek have explained the importance of a customer reporting accurate data and not adjusting the data. Contact will work with AT to ensure their data continues to improve		ТВА	