

Compliance plan for Hamilton City Council DUML – 2019

| Deriving submission information | | | |
|--|---|-----------------|------------------------|
| Non-compliance | Description | | |
| <p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Apr-18</p> <p>To: 30-Nov-18</p> | <p>1,021 items of load with the incorrect ICP or light owner allocated.</p> <p>323 items of load excluded from the monthly wattage report due to being incorrectly recorded as metered lights resulting in an estimated annual under submission of 115,372 kWh.</p> <p>Analysis of the ballasts applied indicate an under submission of 28,825 kWh.</p> <p>Ballast is being averaged in the monthly wattage report to Genesis.</p> <p>Christmas light volumes included for the whole year and not the electrically connected period.</p> <p>Potential impact: Low</p> <p>Actual impact: High</p> <p>Audit history: Twice</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 lamp information is 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 brought this to the HC attention, it was agreed that the HCC will investigate as it could be a RAMM reporting error. | | 01/03/2019 | Investigating |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| Genesis will feed back any ballast averaging issues to HCC in order to ensure accuracy is upheld. | | 01/03/2019 | |

| ICP Identifier | | |
|---|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 2.2 With: Clause 11(2) (a) & (aa) of Schedule 15.3 From: 01-Apr-18 To: 30-Nov-18 | Five items of load with no ICP recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as moderate there are regular checks undertaken of the database accuracy. The impact is assessed to be low due to the small number of items without an ICP allocated. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| HCC and Genesis believe this to be a timing issue, with the project ending, Genesis will work with HCC to validate and correct any outstanding data issues. | 01/03/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Genesis will be requesting a RAMM extraction quarterly to ascertain any potential database inaccuracies. | 01/03/2019 | |

| Tracking of load change | | |
|---|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Apr-18 To: 30-Nov-18 | Items of load are missing from the database. Potential impact: Low Actual impact: Low Audit history: Once 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 rated as low as overall the database accuracy fell within the required +/- 2.5 % variance. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| HCC and Genesis believe this to be a timing issue, with the project ending, Genesis will work with HCC to validate and correct any outstanding data issues. | 01/03/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Genesis will be requesting a RAMM extraction quarterly to ascertain any potential database inaccuracies. | 01/03/2019 | |

| Database accuracy | | |
|--|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Apr-18</p> <p>To: 30-Nov-18</p> | <p>1,021 items of load with the incorrect ICP or light owner allocated.</p> <p>323 items of load incorrectly recorded as a metered light but are unmetered.</p> <p>Analysis of the database identified 930 items of load with an invalid light description.</p> <p>Analysis of the ballasts applied indicate an under submission of 28,825 kWh per annum.</p> <p>Ballast is being averaged in the monthly wattage report to Genesis.</p> <p>Christmas light volumes included for the whole year and not the electrically connected period.</p> <p>Potential impact: Low</p> <p>Actual impact: High</p> <p>Audit history: Once</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 the inaccuracies are being addressed through the LED roll out and accuracy will continue to improve.</p> <p>The impact is assessed to be medium, based on the kWh differences described above and in sections 2.1 & 3.2.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>Met with HCC and have established that there are lamps within the database only for enquiry based reasons, however they have an incorrect ICP applied to them. HCC are correcting this to ensure that reporting is accurate. The description of lamps/ballasts should be amended and was most likely a timing issue as the audit was conducted during the active LED replacement project.</p> <p>HCC had present a proposed fix for the Christmas lighting which Genesis and the auditor both declined as this does not meet compliance. HCC will be revisiting this and will advise.</p> | 01/03/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| HCC & Genesis will continue working together to maintain a high level of accuracy. Genesis has requested RAMM extractions quarterly to assist in the database analysis by Genesis. | 01/03/2019 | |

| 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-Apr-18</p> <p>To: 30-Nov-18</p> | <p>1,021 items of load with the incorrect ICP or light owner allocated.</p> <p>323 items of load excluded from the monthly wattage report due to being incorrectly recorded as metered lights resulting in an estimated annual under submission of 115,372 kWh.</p> <p>Analysis of the ballasts applied indicate an under submission of 28,825 kWh.</p> <p>Christmas light volumes included for the whole year and not the electrically connected period.</p> <p>Ballast is being averaged in the monthly wattage report to Genesis.</p> <p>Potential impact: Low</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 lamp information is 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>Met with HCC and have established that there are lamps within the database only for enquiry based reasons, however they have an incorrect ICP applied to them. HCC are correcting this to ensure that reporting is accurate. The description of lamps/ballasts should be amended and was most likely a timing issue as the audit was conducted during the active LED replacement project.</p> <p>HCC had present a proposed fix for the Christmas lighting which Genesis and the auditor both declined as this does not meet compliance. HCC will be revisiting this and will advise.</p> | | 01/03/2019 | Identified |
| Preventative actions taken to ensure no further issues will occur | | Completion date | |
| <p>HCC & Genesis will continue working together to maintain a high level of accuracy. Genesis has requested RAMM extractions quarterly to assist in the database analysis by Genesis.</p> | | 01/03/2019 | |