

Compliance plan for Porirua City Council Distributed Unmetered Load for Genesis Energy Limited

Title: 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-Jan-18</p> <p>To: 05-Nov-18</p>	<p>Lamps with zero wattage resulting in an estimated 297,744 kWh annual under submission.</p> <p>Lamps with zero gear wattage resulting in an estimated 5,381 kWh annual under submission.</p> <p>1,695 with incorrect gear wattage recorded resulting in an estimated 13,686 kWh annual over submission.</p> <p>The database accuracy is assessed to be 91.9% of the database for the sample checked indicating a potential over submission of approximately 135,900 kWh per annum.</p> <p>NZTA ICP RAMM database estimated under submission of 253,287 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances detailed above.</p> <p>Genesis' pre submission adjustments help to reduce the potential net under submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis Energy has been proactive and have visited PCC 17/10/2018 to work through the issues that Genesis were seeing with their database (RAMM). PCC were very aware the information wasn't accurate, Genesis has suggested potential solutions for PCC to meet the requirements of database accuracy. PCC have rejected those pathways. Genesis are aware that they are potentially over billing/Settling however without the required information Genesis can only bill on what is provided. Monthly, Genesis has had to adjust the information provided to ensure lamp and gear wattages are included in the billing/settlement processes. Genesis are aware that there is LED lighting in the field that is not recorded in the RAMM database due to pocket Ramm failure.</p>	01/03/2019	Investigating

ICP 1001101874UN586 (Traffic Lights - Transit Mana Esplanade, State Highway 1, Plimmerton) are traffic lights and PCC have confirmed they do not on charge NZTA for those. They only manage "Streetlighting" Genesis will need to contact NZTA and work with that entity to confirm/validate traffic lighting for ICP 1001101874UN586.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has visited with PCC to ensure they know their obligations regarding Streetlighting. It seems resourcing is the main reason for data incompleteness. Genesis have been very proactive in working with PCC and will continue. PCC have stated they will attend to the database updates where the pocket Ramm failed. This is a manual data input which will require PCC to complete.	01/03/2019	

Title: ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 01-Jan-18 To: 05-Nov-18	19 items of load do not have an ICP number recorded. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate because almost all items of load have an ICP number recorded. The impact is rated as low, as a very small number of items of load are affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Private light (14) items are private lighting where the council has relinquished the responsibility for the load. Changes to the reporting will begin. The 5 Items with no ICP will be investigated. Genesis are in communication with PCC regarding their compliance requirements.	01/03/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are taking a proactive approach working alongside the council to find solutions for the non-compliances.	01/03/2019	

Title: Location of each item of load			
Non-compliance		Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Jan-18 To: 05-Nov-18		One item of load does not have sufficient location information to enable it to be readily locatable. Potential impact: Low Actual impact: Low Audit history: Three times Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		Controls are rated as strong and the impact as low, because only one exception was identified.	
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will proactively approach PCC to find the missing information pertaining to these assets.		01/03/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis are taking a proactive approach working alongside the council to find solutions for the non-compliances.		01/03/2019	

Title: Description and capacity of load			
Non-compliance		Description	
Audit Ref: 2.4 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Jan-18 To: 05-Nov-18		28 lights have blanks in all fields containing lamp descriptions. 437 lights have zero lamp wattages recorded. 88 lights have zero gear wattages recorded invalidly. Resulting in an estimated under submission of 297,744 kWh Potential impact: High Actual impact: High Audit history: Three times Controls: Moderate Breach risk rating: 6	
Audit risk rating		Rationale for audit risk rating	
High		The controls are rated as moderate because most lamps have description and wattage information recorded but there is room for improvement. PCC has been working to populate the missing information. The audit risk rating is high based on kWh impact on kWh.	

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has visited with PCC to ensure they know their obligations regarding Streetlighting. It seems resourcing is the main reason for data incompleteness. Genesis have been very proactive in working with PCC and will continue. PCC have stated they will attend to the database updates to information populated in RAMM.	01/03/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will endeavour to work with PCC to have their currently populated data brought up to date, correcting any null required values	01/03/2019	

Title: All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 05-Nov-18	Five additional lamps in the field but were not recorded in the database. Potential impact: Low Actual impact: Unknown Audit history: Three times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to ensure most lights are recorded in the database. The impact is unknown but is rated as low, as less than 22 lights were missing from the database.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis Energy has been proactive and have visited PCC 17/10/2018 to work through the issues that Genesis were seeing with their database (RAMM). PCC were very aware the information wasn't accurate, Genesis has suggested potential solutions for PCC to meet the requirements of database accuracy. PCC have rejected those pathways. Genesis are aware that they are potentially over billing/Settling however without the required information Genesis can only bill on what is provided. Genesis are aware that there is LED lighting in the field that is not recorded in the RAMM database due to pocket Ramm failure.	01/03/2019	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has visited with PCC to ensure they know their obligations regarding Streetlighting. It seems resourcing is the main reason for data incompleteness. Genesis have been very proactive in working with PCC and will continue. PCC have stated they will attend to the database updates where the pocket Ramm failed. This is a manual data input which will require PCC to complete.	01/03/2019	

Title: Database accuracy	
Non-compliance	Description
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jan-18</p> <p>To: 05-Nov-18</p>	<p>391 lights have incomplete or unknown description information.</p> <p>1,695 lights had incorrect gear wattages recorded in the database, resulting in estimated under submission of 3,247 W (or 13,868 kWh of over submission based on 4,271 annual burn hours).</p> <p>The database accuracy (excluding the NZTA stratum) is assessed to be 91.1% indicating potential over submission of 135,900 kWh per annum kWh per annum.</p> <p>The database accuracy for the NZTA stratum could not be accurately calculated because the database wattage is recorded as zero for the sample checked. Assuming a 150W wattage for the 353 items with zero wattage this will be resulting in a potential annual under submission of 253,287 kWh.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Three times Controls: Weak Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
<p>High</p>	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances detailed above. Genesis' pre-submission adjustments help to reduce the potential net under submission.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are aware that they have potential billing/Settling inaccuracies, however Genesis can only bill on what is provided. Monthly, Genesis has had to adjust the information provided to ensure lamp and gear wattages are included/excluded and make assumptions in the billing/settlement processes. Genesis visited PCC 17/10/2018 to discuss these issues which were relatively unresolved upon conclusion.	01/03/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has visited with PCC to ensure they now their obligations regarding Streetlighting. It seems resourcing is the main reason for data incompleteness. Genesis have been proactive in working with PCC and this will continue. PCC have stated they will attend to the database updates where the pocket Ramm failed. This is a manual data input which will require PCC to complete. Genesis will provide this audit to PCC to make comments on how PCC could improve database accuracy.	01/03/2019	

Title: Volume information accuracy	
Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Jan-18 To: 05-Nov-18	Lamps with zero wattage resulting in an estimated 297,744 kWh annual under submission. Lamps with zero gear wattage resulting in an estimated 5,381 kWh annual under submission. 1,695 with incorrect gear wattage recorded resulting in an estimated 13,686 kWh annual over submission. The database accuracy is assessed to be 91.9% of the database for the sample checked indicating a potential over submission of approximately 135,900 kWh per annum. NZTA ICP RAMM database estimated under submission of 253,287 kWh per annum. Potential impact: High Actual impact: Unknown Audit history: Three times Controls: Weak Breach risk rating: 9

Audit risk rating	Rationale for audit risk rating		
High	<p>The controls over the database are rated as weak, due to the large proportion of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances detailed above. Genesis' pre submission adjustments help to reduce the potential net under submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has visited with PCC to ensure they now their obligations regarding Streetlighting. It seems resourcing is the main reason for data incompleteness. Genesis have been very proactive in working with PCC and will continue. PCC have stated they will attend to the database updates to information populated in RAMM.</p>		01/03/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis will endeavour to work with PCC to have their currently populated data brought up to date, correcting any null required values</p>		01/03/2019	