## Compliance plan for Whakatane DC DUML – November 2018

Deriving submission information				
Non-compliance	Des	scription		
Audit Ref: 2.1 With: Clause 11(1) of	Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual over submission 243,781.			
Schedule 15.3	Ballast not recorded in the RAMM database resulting in an estimated annual under submission if 27,599 kWh.			
	The database accuracy is assessed to be 110.8% indicating potential under submission of 72,300 kWh per annum.			
	Potential impact: High			
	Actual impact: High			
	Audit history: Once previously			
From: 01-May-18	Controls: Weak			
To: 30-Sep-18	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as weak as the submission is not calculated from an up to date monthly wattage report, and ballast is not recorded in the database.  The impact is assessed to be high due to the kWh volumes.			
	The impact is assessed to be fight due to the kwill volumes.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis have been working with Whakatane DC to get accuracy in their Ramm. The last Ramm reporting received from Whakatane DC is actually very good. Genesis will be changing its current process of using the registry and switching to data supplied which almost matches the auditors Ramm findings. The variances are the constant changes being completed in the field.		01/03/2019	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis have been working with Whakatane DC to get accuracy in their Ramm. The last Ramm reporting received from Whakatane DC is actually very good, bar some minor ballast discrepancies. Genesis have been in communication with Aiden Glynn from WDC who has ensured me the system currently being implanted along with the LED roll out will mean a very high level of data. Genesis has every confidence in this and will be visiting Whakatane DC to get a roadshow of their new system.		01/03/2019		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3  From: 01-May-18 To: 30-Sep-18	Ballast is not recorded as a separate value therefore it is not being reconciled resulting in an estimated 27,599 of under submission per annum.  37 items of load with an invalid or incomplete lamp description.  Potential impact: Medium  Actual impact: Medium  Audit history: Once  Controls: None  Breach risk rating: 8		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak as the lamp ballast are not recorded as a separate field in the database.  The impact is assessed to be medium based on the kWh impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have discussed this issue with Whakatane DC, they have iterated that these most likely will not be corrected due to resource issues and that the completion of the LED roll out by 01/03/2019 as quoted by WDC be "irrelevant". Genesis has informed that the ballast is relevant as this effects the settlements and billing volumes historically.		01/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will be making changes to how the council is billed and how the volumes are settled. Genesis will be conducting its own review of the information provided historically to see if historical revisions can be corrected.		01/03/2019	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	33 additional items of load found in the field sample.		
With: Clause 11(2A)	Potential impact: High		
and (d) of Schedule 15.3	Actual impact: High		
20.0	Audit history: Once		
From: 01-May-18	Controls: Weak		
To: 30-Sep-18	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak due to the volume of additional lights found in the field.		
	The impact is assessed to be high due to the total estimated kWh difference detailed in <b>section 3.1</b> .		
Actions taken to resolve the issue		Completion date	Remedial action status
LED roll out and the current slight delays in having these communicated seems to be the driver behind these variances. Whakatane has advised that the implementation of their new system will give them real time visibility and reporting.		01/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will work with Whakatane DC to build reporting from their new system once its implemented.		01/03/2019	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and	The database accuracy is assessed to be 110.8% indicating potential under submission of 72,300 kWh per annum.  Ballast is not recorded as a separate value therefore it is not being reconciled resulting in an estimated 27,599 of under submission per annum.		
15.37B(b)			
	Potential impact: High		
	Actual impact: High		
From: 01-May-18	Audit history: Once		
To: 30-Sep-18	Controls: Weak		
·	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak as the submission is not calculated from an up to date monthly wattage report, and ballast is not recorded in the database.		
	The impact is assessed to be high due to the kWh volumes.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have discussed this issue with Whakatane DC, they have iterated that these most likely will not be corrected due to resource issues and that the completion of the LED roll out by 01/03/2019 as quoted by WDC be "irrelevant". Genesis has informed that the ballast are relevant as this effects the settlements and billing volumes historically.		01/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will be making changes to how the council is billed and how the volumes are settled. Genesis will be conducting its own review of the information provided historically to see if historical revisions can be corrected.		01/03/2019	

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2 With: Clause 15.2 and	Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual over submission 243,781.			
15.37B(c)	Ballast not recorded in the RAMM database resulting in an estimated annual under submission if 27,599 kWh.			
	The database accuracy is assessed to be 110.8% indicating potential under submission of 72,300 kWh per annum.			
	Potential impact: High			
	Actual impact: High			
	Audit history: Once previously			
From: 01-May-18	Controls: Weak			
To: 30-Sep-18	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as weak as the submission is not calculated from an up to date monthly wattage report, and ballast is not recorded in the database.			
	The impact is assessed to be high due to the kWh volumes.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis have discussed this issue with Whakatane DC, they have iterated that these most likely will not be corrected due to resource issues and that the completion of the LED roll out by 01/03/2019 as quoted by WDC be "irrelevant". Genesis has informed that the ballast are relevant as this effects the settlements and billing volumes historically.		01/03/2019	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will be making changes to how the council is billed and how the volumes are settled. Genesis will be conducting its own review of the information provided historically to see if historical revisions can be corrected.		01/03/2019		