

Compliance plan for Palmerston North CC DUML – Nov 2018

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: 31-Aug-18</p>	<p>PNCC applies unapproved profiles to adjust specified lamp wattages to account for different drive rates and dimming. 3,564 recorded lamp wattages differ from expected values resulting in a potential under submission of 81,000 kWh per annum.</p> <p>The database wattage and ballast inaccuracies are estimated to be in excess of the 623 kWh per annum.</p> <p>Potential impact: High</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>Controls are rated as moderate as the LED light values are being managed well but are recorded at the lower dimmed value.</p> <p>The impact is assessed to be high, based on the kWh differences described in section 3.1.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will manually adjust wattages for the incorrectly recorded LED lights so these reflect the manufacturers maximum wattage.	31 Dec 2018	Identified
We will recalculate and revise historic submission information using the adjusted wattages as far back as the wash up cycle allows.	Ongoing	
We will ask PNCC to correct the other minor inaccuracies identified during this audit	31 Jan 2019	
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue working with PNCC to develop a Code compliant solution for their dimmable LED lighting.	Ongoing	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Apr-18 To: 31-Aug-18	One 20W LED in Monowai Place is not included in the database extract used for submission. 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 because they ensure most information is accurate. The impact is assessed to be low, based on the kWh differences described above.	
Actions taken to resolve the issue		Completion date
We will liaise with PNCC to have this missing light added to the database.		31 Jan 2019
Preventative actions taken to ensure no further issues will occur		Completion date
Remedial action status		
Identified		

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: 31-Aug-18</p>	<p>One item recorded as RGB Sign with a 100W wattage, does not provide sufficient information to be able to confirm the values are correct.</p> <p>PNCC applies unapproved profiles to adjust specified lamp wattages to account for different drive rates and dimming. 3,564 recorded lamp wattages differ from expected values resulting in a potential under submission of 81,000 kWh per annum.</p> <p>The database wattage and ballast inaccuracies are estimated to be in excess of the 623 kWh per annum.</p> <p>Potential impact: High</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 they are sufficient to ensure that the database is accurate 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>We will manually adjust wattages for the incorrectly recorded LED lights so these reflect the manufacturers maximum wattage.</p> <p>We will recalculate and revise historic submission information using the adjusted wattages as far back as the wash up cycle allows.</p> <p>We will ask PNCC to correct the other minor inaccuracies identified during this audit</p>	<p>31 Dec 2018</p> <p>Ongoing</p> <p>31 Jan 2019</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue working with PNCC to develop a Code compliant solution for their dimmable LED lighting.	Ongoing	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>Clause 15.2 and 15.37B(c)</p> <p>From: 01-Apr-18</p> <p>To: 31-Aug-18</p>	<p>PNCC applies unapproved profiles to adjust specified lamp wattages to account for different drive rates and dimming. 3,564 recorded lamp wattages differ from expected values resulting in a potential under submission of 81,000 kWh per annum.</p> <p>The database wattage and ballast inaccuracies are estimated to be in excess of the 623 kWh per annum.</p> <p>Potential impact: High</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 they are sufficient to ensure that the database is accurate 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>We will manually adjust wattages for the incorrectly recorded LED lights so these reflect the manufacturers maximum wattage.</p> <p>We will recalculate and revise historic submission information using the adjusted wattages as far back as the wash up cycle allows.</p> <p>We will ask PNCC to correct the other minor inaccuracies identified during this audit</p>	<p>31 Dec 2018</p> <p>Ongoing</p> <p>31 Jan 2019</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue working with PNCC to develop a Code compliant solution for their dimmable LED lighting.	Ongoing	