

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

The logo for Veritek, featuring the word "VERITEK" in a blue serif font. A vertical blue line is positioned to the left of the text, and a horizontal blue line is positioned below the text, intersecting at the letter 'V'.

For

WESTERN BAY OF PLENTY DISTRICT
COUNCIL
AND GENESIS ENERGY LIMITED

Prepared by: Rebecca Elliot

Date audit commenced: 14 February 2019

Date audit report completed: 25 March 2019

Audit report due date: 26-Mar-19

TABLE OF CONTENTS

Executive summary	3
Audit summary	4
Non-compliances	4
Recommendations	5
Issues 5	
1. Administrative	6
1.1. Exemptions from Obligations to Comply with Code	6
1.2. Structure of Organisation	6
1.3. Persons involved in this audit.....	6
1.4. Hardware and Software	7
1.5. Breaches or Breach Allegations.....	7
1.6. ICP Data	7
1.7. Authorisation Received	7
1.8. Scope of Audit	7
1.9. Summary of previous audit	8
1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F).....	9
2. DUML database requirements.....	10
2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)	10
2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)	11
2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)	12
2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)	12
2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)	13
2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)	14
2.7. Audit trail (Clause 11(4) of Schedule 15.3).....	16
3. Accuracy of DUML database	17
3.1. Database accuracy (Clause 15.2 and 15.37B(b))	17
3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))	19
Conclusion	21
Participant response	22

EXECUTIVE SUMMARY

This audit of the Western Bay of Plenty District Council (**WBOP DC**) DUMML database and processes was conducted at the request of Genesis Energy Limited (**Genesis**), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUMML audits version 1.1.

A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The asset data capture and database population is also conducted by Westlink. The field work is carried out by Horizon.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was updated in October 2018 based on the details from the September report provided by Westlink. The monthly wattage report now includes the ballast information and should be being used for reconciliation purposes.

The audit found four non-compliances and makes one recommendation. The future risk rating of 12 indicates that the next audit be completed in 12 months. I have considered this in conjunction with Genesis' responses and agree with this recommendation. The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	Monthly database reporting not used for submission resulting in a potential under submission of an estimated 1,695.32 kWh per annum. New lights not added to the RAMM database within the month of electrical connection.	Weak	Low	3	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	Three new lights not recorded in the database.	Weak	Low	3	Investigating
Database accuracy	3.1	15.2 and 15.37B(b)	New lights are not added to the database for reconciliation in the month they are electrically connected.	Weak	Low	3	Investigating
Volume information accuracy	3.2	15.2 and 15.37B(c)	Incorrect daily kWh figure recorded in the registry from 1/10/18-28/2/19 resulting in 4,250.65 kWh of under submission. Monthly database reporting not used for submission resulting in a potential under submission of an estimated 1,695.32 kWh per annum. New lights not added to the RAMM database within the month of electrical connection.	Weak	Low	3	Identified
Future Risk Rating						12	

Future risk rating	0	1-4	5-8	9-15	16-18	19+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Recommendation
Tracking of load change	2.6	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	Investigating

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

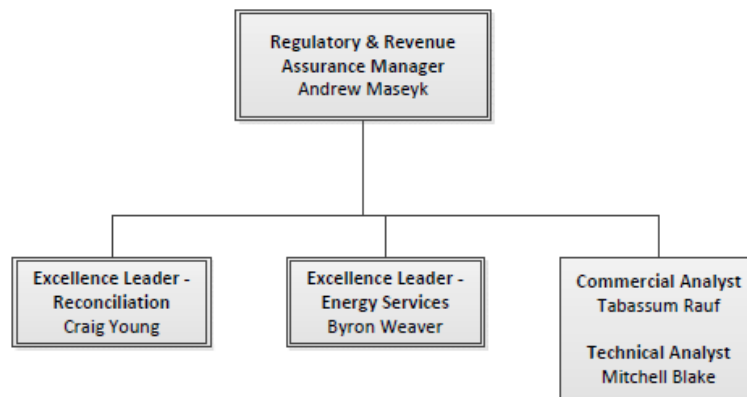
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Genesis provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditor:

Rebecca Elliot

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Craig Young	Excellence Leader - Reconciliation	Genesis Energy
Grace Hawken	Technical Specialist - Reconciliation Team	Genesis Energy
Phillip Barnes	Maintenance Manager	Westlink BOP

1.4. Hardware and Software

The SQL database used for the management of DUML is remotely hosted by RAMM Software Ltd. The database is commonly known as “RAMM” which stands for “Roading Asset and Maintenance Management”.

Westlink confirmed that the database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

1.6. ICP Data

ICP Number	Description	Profile	Number of items of load	Database wattage (watts)
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	UNM	531	46,870

1.7. Authorisation Received

All information was provided directly by Genesis or Westlink.

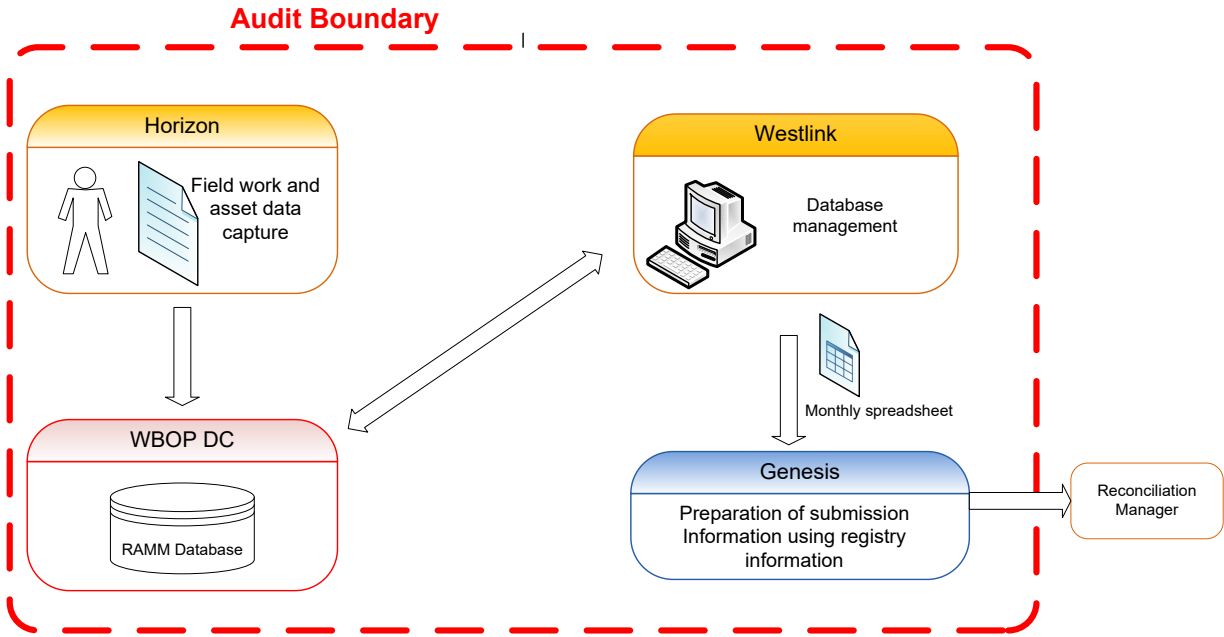
1.8. Scope of Audit

This audit of the Western Bay of Plenty District Council (**WBOP DC**) DUML database and processes was conducted at the request of Genesis Limited (**Genesis**), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The trader details were updated in October 2018 using the details from the September wattage report provided by Westlink. A monthly report detailing the number of lights and lamp wattage is provided each month by Westlink, but this is not used for reconciliation.

The database is remotely hosted by RAMM Software Ltd. The field work is carried out by Horizon. The asset data capture and database population are conducted by Westlink. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information. The diagram below shows the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 115 items of load on 5th March 2019.

1.9. Summary of previous audit

The previous audit was completed in July 2018 by Rebecca Elliot of Veritek Limited. Five non-compliances were identified, and one recommendation was made. The statuses of the non-compliances and recommendation are described below.

Table of Non-Compliance

Subject	Section	Clause	Non-Compliance	Status
DUML Audit	1.10	17.295F of part 17	Audit not completed within 12 month of Part 16A coming into effect.	Cleared
Deriving submission information	2.1	11(1) of Schedule 15.3	Net under submission of an estimated 11,247 kWh per annum.	Still existing
All load recorded in database	2.5	11(2A) of Schedule 15.3	Four lights not included in the database extract used for submission. New lights are not added to the database for reconciliation in the month they are vested to council.	Still existing

Subject	Section	Clause	Non-Compliance	Status
Database accuracy	3.1	15.2 and 15.37B(b)	The database accuracy is assessed to be 100.6% indicating an estimated under submission of 1,100 kWh per annum.	Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	Net under submission of an estimated 11,247 kWh per annum.	Still existing

Recommendations

Subject	Section	Description	Recommendation
Tracking of load change	2.6	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	Still existing

1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)
2. within three months of submission to the reconciliation manager (for new DUML)
3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.

Audit observation

Genesis have requested Veritek to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database within the required timeframe.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- *DUML database is up to date*
- *methodology for deriving submission information complies with Schedule 15.5.*

Audit observation

The process for calculation of consumption was examined and the application of profiles was checked. The database was checked for accuracy.

Audit commentary

Genesis reconciles this DUML load using the UML profile.

Genesis receive a monthly wattage report but uses the trader unmetered load fields on the registry. The trader details were updated in October 2018 using the details from the September report provided by Westlink. The daily kWh value was found to be incorrect and was corrected during the course of this audit. Submissions between October 2018 to February 2019 will be corrected through the wash up process. This is recorded as non-compliance in **section 3.2**.

The previous issue of the monthly report not including ballast was resolved in September 2018 and a monthly report is sent each month but is not being used for reconciliation. This is recorded as non-compliance.

I compared the submission volumes between the load recorded in the database extract and the registry figure for the month of February 2019. There is a minor difference from the wattage recorded in the database, and the registry figure.

ICP Number	Description	February 2019 kWh submission	RAMM estimated February 2019 kWh submission	Estimated kWh February 2019 difference
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	15,475.81	15,617.08	- 141.27

This equates to a potential annual under submission of 1,695.32 kWh. This will be due to the monthly wattage report not being used for reconciliation. This is an improvement from the last audit which recorded a potential under submission of 10,147 kWh per annum.

New lights are not added to the database in the month of these being electrically connected. Three new lights identified in the previous audit have not yet been added to the database. This is discussed further in **sections 2.5** and **2.6**. This is recorded as non-compliance below.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3 From: unknown To: 28-Feb-19	<p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 1,695.32 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as the RAMM database is not used for reconciliation and new lights are not added within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has corrected the current billing process or to allow the implementation of manual registry/fixture updates in Gentrack. Without customer impact.		01/04/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has made changes to how the customer was billed which has enabled the information to be corrected on the registry. Genesis is further investigating one billing process to simplify this process. Genesis will be reviewing the monthly data to ensure the registry daily kW number is as supplied by the audit dataset.		01/04/2019	

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUMML database must contain:

- *each ICP identifier for which the retailer is responsible for the DUMML*
- *the items of load associated with the ICP identifier.*

Audit observation

The database was checked to confirm the correct ICP was recorded against each item of load.

Audit commentary

All items of load have an ICP recorded against them.

Audit outcome

Compliant

2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

The DUMML database must contain the location of each DUMML item.

Audit observation

The databases were checked to confirm the location is recorded for all items of load.

Audit commentary

The database contains fields for the street address and also GPS coordinates.

Audit outcome

Compliant

2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

Code reference

Clause 11(2)(c) and (d) of Schedule 15.3

Code related audit information

The DUMML database must contain:

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

Audit observation

The database was checked to confirm it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

Audit commentary

The database contains the manufacturers rated wattage and the ballast wattage. The extract provided has fields for lamp and gear make and model, and all were populated. The accuracy of the lamp description, capacity and ballasts recorded is discussed in **section 3.1**.

Audit outcome

Compliant

2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.

Audit observation

The field audit was undertaken of a statistical sample of 115 items of load on 5th March 2019.

Audit commentary

The field audit findings for the sample of lamps was accurate with the exception of one lamp that was not present in the field. This is detailed in the table below: are detailed in the table below:

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
SAVAGE AVENUE	5	4	1		1x 70W HPS not found in the field
GRAND TOTAL	115	114	1		

This clause relates to lights found in the field that are not recorded in the database. No additional lights were identified in the field audit. The accuracy of the database is discussed in **section 3.1**.

I rechecked the three new lights identified in the last audit that had not been added to the database and found they were all still to be added to the database:

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
New					
REEL ROAD EXTENTION	0	3	3		Lights not recorded in RAMM

These lights are likely to have been vested to Council by now but Westlink have yet to receive any information from the council to get these lights added to the database nine months after they were identified in the last audit. This is recorded as non-compliance

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 28-Feb-19	Three new lights not recorded in the database. Potential impact: Medium Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as new lights are not added to the database as required by the code. The impact is low as the volume of lights identified is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has made an enquiry with the distributor as to what their process is. This is to ascertain whether notification from the distributor allowing additional load/new connections are being provided to the trader.		01/03/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The current council process with the council's "As BUILTs" and their current contract with WestLink provides challenges as to how Genesis can influence change. Genesis will work with both Council and Westlink, but a change in council process may be required to enable the database to meet compliance.		01/03/2020	

2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

Audit observation

The process for tracking of changes in the database was examined.

Audit commentary

On 20th September 2012 the Authority sent a memo to Retailers and auditors advising that tracking of load changes at a daily level was not required as long as the database contained an audit trail. I have interpreted this to mean that the production of a monthly “snapshot” report is sufficient to achieve compliance. The database tracks additions and removals as required by this clause.

The process to add new streetlights was examined and it remains unchanged from the last audit. WBOP DC approves all new developments and the consent is provided once they are satisfied that the development will meet the required standards. Detailed “as built” are required to be provided by the developer and a walk over by council staff of the development is undertaken before the 224 certificate is issued. Once this is issued the “as built” should be sent to Westlink to upload to RAMM. This process is slow, and it can take some months before this information reaches Westlink. This was evident in this audit as I rechecked the new lights identified in the last audit and these have not yet been added to RAMM nine months later. It is likely that these roads have been vested to council but Westlink have not received any information to progress this. When new lights are added to the database Westlink’s contract does not require them to be added until the 20th of the month following them being advised. This will result in no submission in a further month from the new lights being added if the RAMM database extract was used for submission.

This is recorded as non-compliance in **sections 2.1, 2.5, 3.1 and 3.2.**

The issue identified in the last audit of streetlight circuits being electrically connected before they are vested to council still exists. I repeat the last audit’s recommendation that Genesis and WBOP DC work with the Distributor to determine the most effective process to ensure the volumes associated with these lights are reconciled.

Description	Recommendation	Audited party comment	Remedial action
Tracking of load change	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	<p>The current council process with the council’s “As Built” and their current contract with WestLink provides challenges as to how Genesis can influence change. Genesis will work with both Council and Westlink, but a change in council process may be required to enable the database to meet compliance.</p> <p>Genesis has made an enquiry to PowerCo requesting their current process and whether it incorporates notification to the trader of new load connected.</p>	Investigating

Horizon carries out the field maintenance for Westlink on behalf of WBOP DC and they update RAMM directly. Westlink have robust controls in their contract with Horizon and this ensures that field maintenance is captured in a timely and accurate manner. Outage patrols are in place with the whole network being checked each month. Additional to this Westlink undertake a 20% validation of all assets they are responsible for on an annual basis.

WBOP DC will be undertaking an LED light update, this is still in the planning phase and not expected to be started until the next financial year at the earliest. There are no plans to use a dimming or central management system.

There are no festive lights are connected to the unmetered streetlight circuits and there are no private lights known of or identified as part of the field audit undertaken.

Audit outcome

Compliant

2.7. Audit trail (Clause 11(4) of Schedule 15.3)

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

The DUML database must incorporate an audit trail of all additions and changes that identify:

- *the before and after values for changes*
- *the date and time of the change or addition*
- *the person who made the addition or change to the database.*

Audit observation

The database was checked for audit trails.

Audit commentary

The database has a complete audit trail.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

3.1. Database accuracy (Clause 15.2 and 15.37B(b))

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

Audit observation

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

Plan Item	Comments
Area of interest	Western BOP DC Street Lights in the Waihi area
Strata	The databases contain 527 items of load in the Western BOP DC area. The processes for the management of all WBOPDC items of load is the same and therefore I split the data into two relatively even sized data sets using street name to allocate lights between the strata: <ul style="list-style-type: none">• A-M• N-Z
Area units	I created a pivot table of the roads in each database and used a random number generator in each spreadsheet to select a total of 24 sub-units.
Total items of load	115 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority.

Audit commentary

A statistical sample of 115 items of load found that the field data was 99.1% of the database data for the sample checked. This is within the required database accuracy of 5%+/- . The statistical sampling tool reported with 95% confidence the precision of the sample was 4.4% and the true load in the field will be between 95.6% to 100.0% of the load recorded in the database.

The tool indicated that there is potentially 1,700 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool) of over submission. The statistical sampling tool reported with 95% confidence that there is a potential estimated submission variance range of between zero and 8,800 kWh of over submission but as the accuracy is within the 5% threshold compliance is recorded.

The database was checked against the published standardised wattage table and confirmed that ballasts applied, and lamp descriptions were correct.

As discussed in **section 2.6**, new lights are not being added to the RAMM database within the month of electrical connection as they are not being provided to Westlink until some months after they have been electrically connected. When new lights are added to the database Westlink’s contract does not require them to be added until the 20th of the month following them being advised. This will result in no submission in a further month from the new lights being added if the RAMM database extract was used for submission. This delay in the tracking of load change process is recorded as non-compliance below.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 28-Feb-19	New lights are not added to the database for reconciliation in the month they are electrically connected. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as new lights are not added to RAMM within the month of being electrically connected. The impact is assessed to be low, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has made an enquiry with the distributor as to what their process is. This is to ascertain whether notification from the distributor allowing additional load/new connections are being provided to the trader.		01/03/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
The current council process with the council’s “As Builts” and their current contract with WestLink provides challenges as to how Genesis can influence change. Genesis will work with both Council and Westlink, but a change in council process may be required to enable the database to meet compliance.		01/03/2020	

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- volume information for the DUML is being calculated accurately
- profiles for DUML have been correctly applied.

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that the ICP has the correct profile and submission flag; and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Genesis receive a monthly wattage report but use the trader unmetered load fields on the registry. The trader details were updated in October 2018 using the details from the September report provided by Westlink. This was updated incorrectly to 529.55 kWh per day and was corrected during the course of this audit and backdated to October 2018 to 557.7 kWh per day. This is a daily difference of 28.15 kWh resulting in under submission of 4,250.65 kWh for the period from 1/10/18-28/2/19. The submissions made since October 2018 will be corrected through the wash up process.

The previous issue of the monthly report not including ballast was resolved in September 2018 and a monthly report is sent each month but is not being used for reconciliation. This is recorded as non-compliance.

I compared the submission volumes between the load recorded in the database extract and the registry figure for the month of February 2019. There is a minor difference from the wattage recorded in the database, and the registry figure.

ICP Number	Description	February 2019 kWh submission	RAMM estimated February 2019 kWh submission	Estimated kWh February 2019 difference
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	15,475.81	15,617.08	- 141.27

This equates to a potential annual under submission of 1,695.32 kWh. This will be due to the monthly wattage report not being used for reconciliation. This is an improvement from the last audit which recorded a potential under submission of 10,147 kWh per annum.

New lights are not added to the database in the month of these being electrically connected. Three lights identified in the previous audit have not yet been added to the database. This is discussed further in sections 2.5 and 2.6. This is recorded as non-compliance below.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: unknown To: 28-Feb-19	Incorrect daily kWh figure recorded in the registry from 1/10/18-28/2/19 resulting in 4,250.65 kWh of under submission. Monthly database reporting not used for submission resulting in a potential under submission of an estimated 1,695.32 kWh per annum. New lights not added to the RAMM database within the month of electrical connection. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as the RAMM database is not used for reconciliation and new lights are not added within the month of being electrically connected. The impact is assessed to be low, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has now corrected the registry. The changes were restricted by the billing set of the customer. This has been corrected now and future updates should not be obstructed.		01/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Each DUML customer has its requirements which Genesis maintains with best endeavors. Genesis will where possible make the necessary updates to uphold accuracy of data.		01/03/2019	

CONCLUSION

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information. A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The asset data capture and database population is also conducted by Westlink. The field work is carried out by Horizon.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was updated in October 2018 based on the details from the September report provided by Westlink. The monthly wattage report now includes the ballast information and should be being used for reconciliation purposes.

The audit found four non-compliances and makes one recommendation. The future risk rating of 12 indicates that the next audit be completed in 12 month.

PARTICIPANT RESPONSE

Genesis Energy acknowledges the minor discrepancies with the WBOPDC dataset and will be enquiring into any missing assets with Westlink in due course.

Genesis Energy agrees that the current vesting of council assets process needs to be reviewed, however Genesis also acknowledges that the review process is for council processes/contracts and is not something that can be easily influenced.

Genesis Energy has also requested the distributors process for connecting UML/new load and whether that process includes notification to the trader.

Genesis Energy has corrected the registry information pertaining to the daily kW, enabling the revision process to cater for the monthly under submission of 141.27 kWh.