

## Compliance plan for WBOP DC Genesis DUML – 2019

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3  From: unknown To: 28-Feb-19	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	
<b>Low</b>	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 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	

All load recorded in database		
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	
<b>Low</b>	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	

<b>Database accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 28-Feb-19</p>	<p>New lights are not added to the database for reconciliation in the month they are electrically connected.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are rated as weak as new lights are not added to RAMM within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
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
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
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	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 28-Feb-19</p>	<p>Incorrect daily kWh figure recorded in the registry from 1/10/18-28/2/19 resulting in 4,250.65 kWh of under submission.</p> <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		
<b>Low</b>	<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 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	