

## Compliance plan for Kawerau DC DUML – 2018

DUML Audit		
Non-compliance	Description	
Audit Ref: 3.2 Clause 17.295F of part 17  From: 01-Jun-18 To: 01-Jul-18	Audit not completed within 12 months of Part 16A coming into effect.  Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong, as Genesis are reliant on the database provider to supply the data and in this case the delay caused this report to be late.  The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has been working with Kawerau DC to revise their information within their asset database to be able to utilize for DUML requirements. Albeit there is still some work to be done, Genesis will continue working with Kawerau DC to improve the database accuracy.	01/12/2018	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will continue working with Kawerau DC to improve the database accuracy.	01/12/2018	

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3  From: 01-Jun-17 To: 30-Jun-18	Historic registry figure used for submission. RAMM database is not accurate. Potential impact: Unknown Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
<b>High</b>	The controls are rated as weak as the RAMM database is not used for reconciliation.  The impact is assessed to be unknown due to the registry figure being used, and the RAMM database accuracy being poor therefore I have rated the impact as high.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has initiated the use of the information provided by KDC, seems Genesis will not meet compliance regardless which avenue it takes. The information provided by KDC albeit having inaccuracies relating to missing lamp wattages, Genesis has been able to determine, off notes what the most likely is and where there was no information defaulted. This has led to Genesis halving the daily kW's which is the best representation as to what's in the field.		01/12/2018	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has been in contact with Kawerau DC, unfortunately we have not made too much ground in making the corrections required to meet compliance		01/12/2018	

ICP Identifier		
Non-compliance	Description	
Audit Ref: 2.2 Clause 11(2)(a) & (aa) of Schedule 15.3  From: 01-Jun-17 To: 30-Jun-18	ICP is not recorded in the database.  Potential impact: None Actual impact: None 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 the RAMM database does not hold the ICP. The impact is assessed to be low as there is only one ICP associated with this database.	
Actions taken to resolve the issue		Completion date
Genesis is aware of the issues with the data being supplied and is working with the council to have this rectified. To date this has not been done. Genesis are taking steps to make sure this happens and Ideally have a goal of March -19 to have the council meet.		01/03/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis has been requesting the monthly extraction, to date this highlights no changes have been initiated. Genesis review this report and request changes, Genesis will continue with this process.		01/03/2018
		Identified

Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3 Clause 11(2)(b) of Schedule 15.3  From: 01-Jun-17 To: 30-Jun-18	17 items of load with insufficient location details.  Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate as the location is recorded for all but 17 items of load.  The impact is assessed to be low as there are only 17 items of load with insufficient location details.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis is aware of the issues with the data being supplied and is working with the council to have this rectified. To date this has not been done. Genesis are taking steps to make sure this happens and Ideally have a goal of March -19 to have the council meet.		01/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has been requesting the monthly extraction, to date this highlights no changes have been initiated. Genesis review this report and request changes, Genesis will continue with this process.		01/03/2018	

Description and capacity of each item of load			
Non-compliance	Description		
Audit Ref: 2.4 Clause 11(2)(c)&(d) of Schedule 15.3  From: 01-Jun-17 To: 30-Jun-18	71 items of load with no lamp description, wattage and ballast recorded. 146 items of load with no lamp and ballast wattage recorded. 30 items of load with no ballast recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as weak the data quality indicates a lack of quality control to check the data being inputted.  The impact is assessed to be low as overall volume of load is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis is aware of the issues with the data being supplied and is working with the council to have this rectified. To date this has not been done. Genesis are taking steps to make sure this happens and Ideally have a goal of March -19 to have the council meet.		01/03/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has been requesting the monthly extraction, to date this highlights no changes have been initiated. Genesis review this report and request changes, Genesis will continue with this process.		01/03/2018	

<b>All load recorded in database</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 02-Jul-18	79 lights not included in the database extract. Potential impact: Medium Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 6	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>High</b>	The controls are rated as weak the data quality indicates a lack of quality control to check the data being inputted. The impact is rated as high as the actual impact is unknown as the registry figure is being used for reconciliation.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Genesis are unaware of any missing information as Genesis relies on the extraction of the asset database. Genesis will raise this with the council to have rectified.		01/03/2019
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
Genesis can't realistically control this as Genesis relies on the customer to ensure that this information is provided. Genesis can however maintain and drive the changes that the audit identifies.		01/03/2019
		Investigating

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 31-Jul-18</p>	<p>The database accuracy is assessed to be 113.5% indicating potential under submission of 23,500 kWh per annum if the database were used for submission.</p> <p>Lamp wattage recorded as ballast wattage indicating an estimated over submission of 79,048 kWh of over submission if the database were used for submission.</p> <p>218 items of load with missing wattage values indicating an estimated under submission of 26,758 kWh if the database were used for submission.</p> <p>Festive lighting is connected but the volume is not recorded.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls are rated as weak the data quality indicates a lack of quality control to check the data being inputted.</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
Genesis is engaging with the council to have this information accurately depicted in the RAMM database. Genesis has initiated the correction of the information and have started the rebilled and revision of the information billed and settled.		01/03/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis will continue to review the KDC information provided monthly.		01/03/2019
<b>Remedial action status</b>		
Identified		

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: 01-Jun-17 To: 30-Jun-18	Historic registry figure used for submission Potential impact: Unknown Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	The controls are rated as weak as the RAMM database is not used for reconciliation. The impact is assessed to be unknown due to the registry figure being used and the RAMM database accuracy being poor therefore I have rated the impact as high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has initiated the use of the information provided by KDC, seems Genesis will not meet compliance regardless which avenue it takes. The information provided by KDC albeit having inaccuracies relating to missing lamp wattages, Genesis has been able to determine, off notes what the most likely is and where there was no information defaulted. This has led to Genesis halving the daily kW's which is the best representation as to what's in the field.	01/12/2018	Identified
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Genesis has been in contact with Kawerau DC, unfortunately we have not made too much ground in making the corrections required to meet compliance	01/12/2018	