

Compliance plan for Whakatane DC DUML – 2019

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Oct-18 To: 31-Mar-19</p>	<p>Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual under submission 14,136 kWh.</p> <p>Telensa system used to control lighting without an approved profile.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the submission is not calculated for an up to date data source and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the number of factors identified above resulting in the true impact on submission being unknown.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>the result of the under submitted volumes does not stem from the streetlighting separation from the network relays.</p> <p>WDC agreed to remedy these issues outstanding from the LED upgrade that is taking place in which has led to lamp attribute exceptions.</p> <p>Genesis will be requesting information from the Telensa system to determine on/off times and wattage reporting in the future.</p>	01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis rely on the contracted customer and their 3rd party contractor(s) to ensure that the asset information is updated accurately and in a timely manner. Genesis will advise of any exceptions when identified to WDC for correction.</p>	01/06/2019	

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) & (aa) of Schedule 15.3 From: 01-Oct-18 To: 31-Mar-19	Items of load associated with ICP 1000023061BPCA7 (Murupara amenity lights) are not recorded in a database. 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 as the street lights have robust controls in place but there are no controls in place for the amenity lights. The impact is assessed to be low as the volume of lights associated with the ICP are small (nine lights indicated on the registry). The volume is being reconciled based on the registry kWh figure which is based on historical information.	
Actions taken to resolve the issue	Completion date	Remedial action status
Requested the amenity lighting processes to be outlined and which ICP the information is being reconciled under and the system information source.	01/07/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
All exception reporting to include any amenity lighting issue identified. Liaise with the council division to have these rectified.	01/07/2019	

Location of each item of load		
Non-compliance	Description	
<p>Audit Ref: 2.3</p> <p>With: Clause 11(2)(b) of Schedule 15.3</p> <p>From: 01-Oct-18</p> <p>To: 31-Mar-19</p>	<p>Items of load associated with ICP 1000023061BPCA7 (Murupara amenity lights) are not recorded in a database and therefore the location is not recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: none</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate as the street lights have robust controls in place but there are no controls in place for the amenity lights.</p> <p>The impact is assessed to be low as the volume of lights associated with the ICP are small (nine lights indicated on the registry). The volume is being reconciled based on the registry kWh figure which is based on historical information.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Requested the amenity lighting processes to be outlined and which ICP the information is being reconciled under and the system information source.	01/07/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
All exception reporting to include any amenity lighting issue identified. Liaise with the council division to have these rectified.	01/07/2019	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 01-Oct-18</p> <p>To: 31-Mar-19</p>	<p>74 items of load with an invalid or incomplete lamp description.</p> <p>Items of load associated with ICP 1000023061BPCA7 (Murupara amenity lights) are not recorded in a database and therefore the lamp type and capacity are not recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate as the lamp ballast is now recorded in the database. Some errors were found indicating that the controls have not identified all discrepancies.</p> <p>The impact is assessed to be low as the volume of lights with ballasts associated continues to diminish with the LED roll out and the volume of lights associated with ICP 1000023061BPCA7 is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
WDC agreed to remedy these issues outstanding from the LED upgrade that is taking place in which has led to lamp attribute exceptions. Genesis will monitor WDC progress on these issues.		01/07/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will provide WDC with exception reporting when dataset discrepancies are identified.		01/07/2019	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) and (d) of Schedule 15.3 From: 01-Oct-18 To: 31-Mar-19	13 additional items of load found in the field sample. Potential impact: High Actual impact: High Audit history: Twice Controls: Moderate Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as moderate as the process to update the database is robust and the majority of additional lights found were due to timing differences. The impact is assessed to be high as reconciliation is not being derived from up to date data.	
Actions taken to resolve the issue		Completion date
WDC agreed to remedy these issues outstanding from the LED upgrade that is taking place in which has led to lamp attribute exceptions. Genesis will be deriving energy volumes based off Telensa provided information moving forward. Genesis does plan to investigate revision accuracy.		01/09/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis will provide WDC with exception reporting when dataset discrepancies are identified.		01/07/2019
Remedial action status		
Investigating		

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Oct-18 To: 01-Mar-19	205 items of load with incorrect ballast applied. Potential impact: Low Actual impact: None Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as ballasts are now recorded in the database but were found to have some errors indicating controls in place did not identify these. The audit risk rating is assessed to be low as the errors found in relation to incorrect ballasts will have no impact on reconciliation as submission is calculated from a database extract provided in July 2018.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has previously utilised the registry data as monthly reporting was not being supplied albeit requested. The WDC has now agreed to supply Genesis with a monthly report which Genesis will be using for monthly calculation of energy volumes.	01/07/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis have requested monthly data from the Telensa system to utilise for monthly billing and settlements.	01/07/2019	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-May-18 To: 30-Sep-18	Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual under submission 14,136 kWh. Telensa system used to control lighting without an approved profile. Potential impact: High Actual impact: Unknown Audit history: Twice previously 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 for an up to date data source and the burn hours used to calculate submission are fixed but are variable in the field. The impact is assessed to be high due to number of factors identified above resulting in the true impact on submission to unknown.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis were only made aware of the burn hours source change when Genesis attended the Whakatane DC review of findings late April. Genesis will be utilising the Telensa, RAMM sync data and operational hours derived from the system for future energy calculations.		01/09/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis discussed the auditor's findings in detail and have iterated the importance of notifications of changes and how these will have an effect on both billing and purchases of energy volumes. Genesis also has an opportunity to gain access for reporting purposes of the Telensa system maintained by WDC.		01/05/2019	