Compliance plan for Nelson City Council Distributed Unmetered Load for Trustpower Limited

Title: Deriving Submission Information	
Non-compliance	**Description**
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: unknown To: 31-Dec-18	The database used to prepare submissions contains some inaccurate information. • Missing lamp models and wattages for 16 lamps in the RAMM database resulting in 6,560 kWh per annum of under submission if it were used directly for reconciliation. • Incorrect ballast wattages in Trustpower's file used for submission resulting in 68 kWh per annum of over submission. • Missing ballast wattages in the RAMM database resulting in a potential 94,945 kWh per annum if used for submission. • The database accuracy is assessed to be 108.3% indicating potential under submission of 113,800 kWh per annum if it were used for submission. The majority of the database inaccuracies identified in the field audit (67/72) related to missing ballast wattages which are populated in Trustpower's file and do not impact on submission, therefore the actual impact to the market is far less volume indicated above. • Differences between Trustpower's database used for submission and the RAMM database based on the difference in nominal lamp wattage are 24,887 kWh per annum of under submission, and based on the estimated ballast wattages are 107,890 kWh per annum. Potential impact: High Actual impact: Unknown Audit history: Once Controls: Weak Breach risk rating: 9
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak, due to the differences in lamp wattages and counts between the Trustpower file used to calculate submissions and the Powertech data. The impact is assessed to be high based on the kWh above, but the impact of the missing ballast wattages in the database is greatly reduced, because Trustpower adds on the missing ballast wattages prior to submission.

Actions taken to resolve the issue	Completion date	Remedial action status
Ballast information sourced from DUML tables to be populated in next 20 working day	30/03/19	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Ensure any new ballasts added have correct wattage recorded	30/03/19	

Title: ICP identifier and items of load	
Non-compliance	**Description**
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: unknown To: 31-Dec-18	20 items of load do not have an ICP number recorded in RAMM. 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 they are sufficient to ensure that most items of load have an ICP number recorded. The impact is low because only 20 items of load are affected and the wattage is low.

Actions taken to resolve the issue	Completion date	Remedial action status
All ICPs now added	22/03/19	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Ensure accuracy of data entry	30/03/19	

Title: Location of each item of load	
Non-compliance	**Description**
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: unknown To: 31-Dec-18	Three of the items of load do not have sufficient address information recorded in RAMM to allow them to be readily located. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1

Audit risk rating	Rationale for audit risk rating
Low	The controls are rated as strong they are not sufficient to ensure that most almost all items of load have full address information recorded. The impact is low, because three of the 5,387 items of load are affected.

Actions taken to resolve the issue	Completion date	Remedial action status
Site checks prove these records have no actual asset. Records have been deleted from RAMM	22/03/19	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Ensure accuracy of data entry	30/03/19	

Title: Description and capacity of load	
Non-compliance	**Description**
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: unknown To: 31-Dec-18	16 items of load have unknown or blank lamp model, and zero wattage in RAMM. No items of load have ballast wattages recorded in RAMM. Potential impact: High Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as weak as they are not sufficient to ensure that most items of load have make, model, lamp and wattage recorded. The impact is low, because: • Trustpower adjusts the wattages to include the ballast wattage prior to calculating their submissions. • The impact of the 16 items of load with unknown or blank lamp models is estimated to be 1536W.

Actions taken to resolve the issue	Completion date	Remedial action status
System wattages updated for above except two items which are private lights not maintained by Powertech	23/03/19	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Ensure all information is recorded at time of entry	30/03/19	

Title: Database accuracy	
Non-compliance	**Description**
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 31-Dec-18	The database contains some inaccurate data. The field data is 108.3% of the database data for the sample checked. This will result in potential under submission of 113,800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool) resulting in a potential 94,945 kWh per annum if used for submission. 16 items of load have unknown or blank lamp model, and zero wattage. The total wattage for the affected lights is unknown, but is estimated to be 1,536W or approximately 6,560 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). No items of load have ballast wattages recorded in RAMM. The missing ballast wattage is estimated to be 21,996W or approximately 94,945 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool) if used for submission. 20 items of load do not have an ICP number recorded. Three of the items of load do not have sufficient address information to allow them to be readily located. Potential impact: High 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, because they are not sufficient to ensure that database wattage is accurate. The impact is assessed to be low: • the majority of the database inaccuracies identified in the field audit (67/72) and database review related to missing ballast wattages which are populated in Trustpower's file and therefore do not impact on submission. • A small number of lamps have missing make, model and wattage information or ICP information.

Actions taken to resolve the issue	Completion date	Remedial action status
Ballast information to be added to RAMM. ICPs missing now added.	22/03/19	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Ensure all information is recorded at time of entry	Ongoing	

Title: Volume information accuracy	
Non-compliance	**Description**
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: unknown To: 31-Dec-18	The database used to prepare submissions contains some inaccurate information. • Missing lamp models and wattages for 16 lamps in the RAMM database resulting in 6,560 kWh per annum of under submission if it were used directly for reconciliation. • Incorrect ballast wattages in Trustpower's file used for submission resulting in 68 kWh per annum of over submission. • Missing ballast wattages in the RAMM database resulting in a potential 94,945 kWh per annum if used for submission. • The database accuracy is assessed to be 108.3% indicating potential under submission of 113,800 kWh per annum if it were used for submission. The majority of the database inaccuracies identified in the field audit (67/72) related to missing ballast wattages which are populated in Trustpower's file and do not impact on submission, therefore the actual impact to the market is far less volume indicated above. • Differences between Trustpower's database used for submission and the RAMM database based on the difference in nominal lamp wattage are 24,887 kWh per annum of under submission, and based on the estimated ballast wattages are 107,890 kWh per annum. Potential impact: High Actual impact: Unknown Audit history: Once Controls: Weak Breach risk rating: 9
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as weak, due to the differences in lamp wattages and counts between the Trustpower file used to calculate submissions and the Powertech data. The impact is assessed to be high based on the kWh above, but the impact of the missing ballast wattages in the database is greatly reduced, because Trustpower adds on the missing ballast wattages prior to submission.

Actions taken to resolve the issue	Completion date	Remedial action status
Ramm to be updated as per above my added comments.	22/03/19	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Ensure all information is recorded at time of entry.	Ongoing	