

Compliance plan for Invercargill City Council – 2019

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 16A.26 From: 01-Apr-19 To: 09-May-19	Audit not completed by the due date. 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, as Trustpower have good controls in place to ensure DUML audits are completed within the required timeframe but are reliant on the council to provide information which despite multiple requests was not received in sufficient time causing the audit to be deferred. 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
Have spoken to ICC about the timely supplying of the DB for the Audit purpose. They were under the understanding that the Auditors would get that from Trustpower	22 May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We are happy that this wouldn't happen again as per above comments		

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 23-Mar-18</p> <p>To: 05-Oct-18</p>	<p>The database accuracy is assessed to be 77.4% indicating a potential over submission of approximately 699,900 kWh per annum.</p> <p>16 items of load with either an incorrect lamp description or wattage or ballast applied.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice</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 level of error found in the field indicates that quality controls in place do not ensure an acceptable level of accuracy.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>This audit has identified a failure in the data updating process which should have been identified by Council.</p> <p>The flow of information from the field, being the actual pole number, date and fitting name etc is correct. The bulk load process into RAMM appears to have some process error in a particular month.</p>		30 Jun 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Review the data provided from the field and validate the pole numbers are in database so when the import occurs there is a 1 to 1 relationship.</p> <p>Have additional QA process to reconcile the field payment with the actual number of fittings updated into RAMM. (ie balance the contractor payment with the changes into the database</p> <p>Recheck the final output (which is sent to Trust Power) to ensure those updates are in the billing data</p> <p>Reconcile as a total the number of installs with the number in database and maintain ongoing, checking inventory.</p> <p>Produce visual map of upgrades vs existing fittings so see any issues.</p> <p>Undertake field checks of all non LED lights</p> <p>Undertake ICC random audits to verify accuracy.</p>		30 Jun 2019	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 08-Oct-18 To: 31-Mar-19	Three additional lights were found in the field. Potential impact: Medium 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 level of error found in the field indicates that quality control in relation to what is entered into the database and what is in the field is not identifying discrepancies. The impact is assessed to be low based on small number of additional lights found in the field compared to the overall sample checked.		
Actions taken to resolve the issue		Completion date	Remedial action status
This result is over emphasised as the same input error is repeated 25 and 16 times. This makes the overall result look much worse than the actual update error which has been identified earlier		22 nd May 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Following this audit ICC has instigated their own audit process because they have all the checks in place but had not had any one person check that they all application were carried out		30 th June 2019	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 08-Oct-18 To: 31-Mar-19	The database accuracy is assessed to be 77.4% indicating a potential over submission of approximately 699,900 kWh per annum. 16 items of load with either an incorrect lamp description or wattage or ballast applied. Potential impact: High Actual impact: High Audit history: Twice Controls: Weak Breach risk rating:9	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak as the level of error found in the field indicates that quality controls in place do not ensure an acceptable level of accuracy. The impact is assessed to be high, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Have discussed with ICC and they will check and correct the DB	22 nd May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
ICC will check complete DB for such issues	30 th June 2019	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: entire audit period</p>	<p>The database accuracy is assessed to be 77.4% indicating a potential over submission of approximately 699,900 kWh per annum.</p> <p>16 items of load with either an incorrect lamp description or wattage or ballast applied.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice</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 level of error found in the field indicates that quality controls in place do not ensure an acceptable level of accuracy.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Have discussed with ICC	22 nd May 2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As ICC is nearing the completion of the complete up-grade of the entire lighting system to LED. There was always going to be some errors from getting field information to the DB. They have checks all along the path but had no one person checking these against each other to see if they all agreed, which they don't. The individual checks such as the contractor have to book each fitting out of a store and then account for the installation of the fitting before getting paid is now being checked as well as the entering such information into their DB in a timely manner to meet with the monthly reporting to TP. They are expecting to have the LED roll out completed by 30 th June. They are then setting up a process to check the field changes against the DB so both will align.	30 June 2019	