

Compliance plan for Opotiki District Council DUML – 2019

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 17.295F of part 17 From: 01-Jun-18 To: 01-Jun-19	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	
Low	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 the volume of lights associated with this database are small.	
Actions taken to resolve the issue		Completion date
It has taken some time and considerable effort to engage the Council in providing the required data and being open to scrutiny.		10/06/2019
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis has engaged with the Council and will be providing data base information monthly		10/06/2019
		Cleared

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Jun-18</p> <p>To: 31-May-19</p>	<p>Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual over submission 149,160 kWh.</p> <p>Telensa system used to control lighting without an approved profile.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>76 items of load with no wattage recorded resulting in a small amount of under submission.</p> <p>Light changes being recorded without the actual date of installation being known.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</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 but is likely to be high due to the volume of over submission indicated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has previously not been provided with any data pertaining to the ODC assets. The registry information was used to bill/settle the customers load. The dataset that has been received has been analysed and returned to the council; to review. Genesis has found the same issues in the data set as outlined by the auditor and will work with the Council to correct the information as required. Genesis will make the necessary correction to the data as they wish to use this moving forward with the intent the data source will be corrected for future reporting.</p>		01/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis along with its auditor made efforts to contact the council in order to get access to their data and the system for auditing purposes.</p>		01/06/2019	

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-Jun-18</p> <p>To: 31-May-19</p>	<p>65 items of load with no lamp description, wattage and ballast recorded.</p> <p>11 items of load with no lamp wattage or ballast 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 this information is expected to be captured as part of Opus' management of the RAMM database.</p> <p>The impact is assessed to be low as the volume of lights with no wattage is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has previously not been provided with any data pertaining to the ODC assets. The registry information was used to bill/settle the customers load. The dataset that has been received has been analysed and returned to the council; to review. Genesis has found the same issues in the data set as outlined by the auditor and will work with the Council to correct the information as required. Genesis will make the necessary correction to the data as they wish to use this moving forward with the intent the data source will be corrected for future reporting.</p>		01/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Monthly reporting will enable Genesis to exception report back to the Council/Opus, enabling the correction of any exceptions. This is a work in progress, the future date is a date that Genesis believe is achievable to have the dataset compliant.</p>		01/12/2019	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Jun-18 To: 31-May-19	One additional light found in the field. 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 Opus manage the database changes on ODC's behalf and their controls mitigate risk most of the time. The impact is rated as high as the actual impact is unknown as the registry figure is being used for reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis plans to utilise the information provided by the council for future settlements/billing and analyze the data to rectify historical revisions.		01/07/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will be using the RAMM data for future reporting enabling the controls to be accurately measured.		01/07/2019	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Jun-18 To: 31-May-19	65 items of load with no lamp description, wattage and ballast recorded. 11 items of load with no lamp wattage or ballast recorded. Date of install is not recorded for all changes made in the field. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the information returned from the field is not always complete and is being entered into RAMM without the correct date of install being known. The impact is assessed to be low as the volume of lights with no wattage is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will need to discuss this process with the council as the data set itself will not identify this as a discrepancy to the trader as it will be relying on field work completeness to populate correct dates.	01/12/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Request the correct dates to be entered in the field paper work enabling data base information accuracy.	01/12/2019	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Jun-18</p> <p>To: 31-May-19</p>	<p>Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual over submission 149,160 kWh.</p> <p>Telensa system used to control lighting without an approved profile.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>76 items of load with no wattage recorded resulting in a small amount of under submission.</p> <p>Light changes being recorded without the actual date of installation being known.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</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 but is likely to be high due to the volume of over submission indicated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has previously not been provided with any data pertaining to the ODC assets. The registry information was used to bill/settle the customers load. The dataset that has been received has been analysed and returned to the council; to review. Genesis will make the necessary correction to the data as they wish to use this moving forward with the intent the data source will be corrected for future reporting.</p>		01/12/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis along with its auditor made efforts to contact the council to get access to their data and the system for auditing purposes. Genesis has contacted the EA in regard to the use of Telensa system burn times.</p>		01/06/2019	