

# Compliance plan for Selwyn DC – 2019

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 12-Apr-19</p>	<p>The database contains some inaccurate data.</p> <p>The database accuracy is assessed to be 84.2% indicating an estimated over submission of 385,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUMML database auditing tool).</p> <p>95 lights had a recorded wattage which differed from the expected wattage, resulting in estimated over submission of 272.5W or 1164 kWh per annum (based on annual burn hours of 4,271). Orion corrected the values to match the expected wattages during the audit.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p><b>Response:</b> Non compliance accepted and remedial action on-going</p> <p><b>Action:</b> SDC has confirmed with Connetics that some of the sites identified as inaccurate have already been resolved and are awaiting paperwork before the database can be updated. There are a number of zones/groups that were identified that have been actioned, and are in the process of being completed.</p> <p>SDC is aware of the inaccuracies, and are working to get these resolved.</p> <p>Mercury will correct the volume in the subsequent washup files.</p>	On going	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>SDC have contracted Connetics to conduct a bulk LED upgrade and head replacement which has been approved by Orion. This will be completed over the next few years.</p> <p>Over time this will improve the accuracy of the database as a whole, however the biggest restriction is the reliance on the return of paperwork before the database can be corrected.</p> <p>Once the paperwork for each job is received, the database will be updated with the corrected information.</p>	On going	

All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 10-Apr-19</p>	<p>14 items of load were missing from the database.</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	
<p><b>Low</b></p>	<p>Controls are rated as moderate. Almost all the differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database.</p> <p>The impact is assessed to be low. The combined missing load is 935W, or 3,993 kWh per annum based on 4271 annual burn hours.</p>	
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<p><b>Response:</b> Non compliance accepted and remedial action on-going</p> <p><b>Action:</b></p> <p>SDC has confirmed with Connetics that some of the sites identified as inaccurate have already been resolved and are awaiting paperwork before the database can be updated. There are a number of zones/groups that were identified that have been actioned, and are in the process of being completed.</p> <p>SDC is aware of the inaccuracies, and are working to get these resolved.</p> <p>Mercury will correct the volume in the subsequent washup files.</p>	On going	Identified

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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: 12-Apr-19</p>	<p>The database contains some inaccurate data.</p> <p>The database accuracy is assessed to be 84.2% indicating an estimated over submission of 385,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>95 lights had a recorded wattage which differed from the expected wattage, resulting in estimated over submission of 272.5W or 1164 kWh per annum (based on annual burn hours of 4,271). Orion corrected the values to match the expected wattages during the audit.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
High	<p>Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.</p>

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Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 12-Apr-19</p>	<p>The database contains some inaccurate data.</p> <p>The database accuracy is assessed to be 84.2% indicating an estimated over submission of 385,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>95 lights had a recorded wattage which differed from the expected wattage, resulting in estimated over submission of 272.5W or 1164 kWh per annum (based on annual burn hours of 4,271). Orion corrected the values to match the expected wattages during the audit.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>

Audit risk rating	Rationale for audit risk rating		
<p><b>High</b></p>	<p>Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.</p>		
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