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: 02-May-18	The database used to prepare submissions contains some inaccurate information. • The database accuracy is assessed to be 99.9% indicating an estimated over submission of 115 kWh per annum. • Ballast wattages are not recorded in the database, resulting in under recorded wattage of approximately 60,165 watts. Ballast wattages are correctly included in Trustpower's submissions. • Nine unmetered items of load have an unknown or blank lamp model, and zero wattage. Potential impact: High 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, because they are not sufficient to ensure that database wattage is accurate. The impact is assessed to be low, because Trustpower adds on the missing ballast wattages prior to submission. If Trustpower did not correct these wattages, the impact could be high.

Actions taken to resolve the issue	Completion date	Remedial action status
TRUS adds ballast to lamp wattages as standard procedure when calculating submission data. NCC are changing the majority of their lamps to LED. They will look at adding ballast into their database for non LED lamps when they have completed this project.	Project end date is expected to be 31/12/18	Identified
Powertech will investigate and update the historic database anomalies	30/06/18	

Preventative actions taken to ensure no further issues will occur	Completion date	
The LED conversion project is causing an overhaul of the database as lamps are replaced. New Connections and maintenance are all handled by Powertech who have procedures in place to update and validate site changes to the database for new occurrences.	Project end date is expected to be 31/12/18	

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: 02-May-18	Three items of load do not have an ICP number recorded. 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 three items of load are affected and the wattage is low.

Actions taken to resolve the issue	Completion date	Remedial action status
Powertech will investigate and update the historic database anomalies	30/06/18	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
New Connections and maintenance are all handled by Powertech who have procedures in place to update and validate site changes to the database for new occurrences.	30/06/18	

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: 02-May-18	Nine items of load have unknown or blank lamp model, and zero wattage. No items of load have gear wattages recorded. Potential impact: High Actual impact: Low Audit history: Once previously 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 gear wattage recorded. The impact is low, because Trustpower adjusts the wattages to include the gear wattage prior to calculating their submissions. The impact of the nine items of load with unknown or blank lamp models is expected to be low.

Actions taken to resolve the issue	Completion date	Remedial action status
TRUS adds ballast to lamp wattages as standard procedure when calculating submission data. NCC are changing the majority of their lamps to LED. They will look at adding ballast into their database for non LED lamps when they have completed this project.	Project end date is expected to be 31/12/18	Identified
Powertech will investigate and update the historic database anomalies	30/06/18	
Preventative actions taken to ensure no further issues will occur	**Completion date**	
The LED conversion project is causing an overhaul of the database as lamps are replaced. New Connections and maintenance are all handled by Powertech who have procedures in place to update and validate site changes to the database for new occurrences.	Project end date is expected to be 31/12/18	

Title: Database accuracy	
Non-compliance	**Description**
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 02-May-18	The database used to prepare submissions contains some inaccurate information. • The database accuracy is assessed to be 99.9% indicating an estimated over submission of 115 kWh per annum. • Ballast wattages are not recorded in the database, resulting in under recorded wattage of approximately 60,165 watts. • Nine unmetered items of load have an unknown or blank lamp model, and zero wattage. Potential impact: High 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, because they are not sufficient to ensure that database wattage is accurate. The impact is assessed to be low, because Trustpower adds on the missing ballast wattages prior to submission. If Trustpower did not correct these wattages, the impact could be high.

Actions taken to resolve the issue	Completion date	Remedial action status
TRUS adds ballast to lamp wattages as standard procedure when calculating submission data. NCC are changing the majority of their lamps to LED. They will look at adding ballast into their database for non LED lamps when they have completed this project. Powertech will investigate and update the historic database anomalies	Project end date is expected to be 31/12/18 30/06/18	Identified

Title: Volume information accuracy	
Non-compliance	**Description**
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: unknown To: 02-May-18	The database used to prepare submissions contains some inaccurate information. • The database accuracy is assessed to be 99.9% indicating an estimated over submission of 115 kWh per annum. • Ballast wattages are not recorded in the database, resulting in under recorded wattage of approximately 60,165 watts. Ballast wattages are correctly included in Trustpower's submissions. • Nine unmetered items of load have an unknown or blank lamp model, and zero wattage. Potential impact: High 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, because they are not sufficient to ensure that database wattage is accurate. The impact is assessed to be low, because Trustpower adds on the missing ballast wattages prior to submission. If Trustpower did not correct these wattages, the impact could be high.

Actions taken to resolve the issue	Completion date	Remedial action status
TRUS adds ballast to lamp wattages as standard procedure when calculating submission data. NCC are changing the majority of their lamps to LED. They will look at adding ballast into their database for non LED lamps when they have completed this project. Powertech will investigate and update the historic database anomalies	Project end date is expected to be 31/12/18 30/06/18	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	
The LED conversion project is causing an overhaul of the database as lamps are replaced. New Connections and maintenance are all handled by Powertech who have procedures in place to update and validate site changes to the database for new occurrences	Project end date is expected to be 31/12/18	

Preventative actions taken to ensure no further issues will occur	Completion date	
NCC are changing the majority of their lamps to LED. They will look at adding ballast into their database for non LED lamps when they have completed this project.	Project end date is expected to be 31/12/18	