

Actions taken to resolve the issue	Completion date	Remedial action status
The over submission is due to the database not being updated as LED lights are replacing legacy lights in the field – Contact is working with Orion, see the participant comments at the end of this report – to ensure compliance.	27/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Resubmission will be completed in an appropriate manner when each group is made compliant, ensuring that this is within a 14 month period. We will continue to work with Orion and CCC to ensure compliance	27/05/2019	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clauses 11(2)(c) and (d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 12-Apr-19</p>	<p>Mainpower</p> <p>One lamp in the Mainpower database does not have a lamp model, lamp wattage or ballast wattage recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong, because only one item of load with missing details was identified.</p> <p>The impact is unknown, but assessed to be low because only one light was affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Mainpower will investigate this light	27/05/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
CTCT don't believe it necessary to change any processes for 1 light	27/05/2019	

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: 12-Apr-19</p>	<p>Orion</p> <p>13 items of load missing from the database.</p> <p>Mainpower</p> <p>Five items of load missing from the database.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as weak overall, as they are not sufficient to ensure that all load is consistently recorded in the database, particularly for Orion customer owned lights.</p> <p>The impact is assessed to be low based on the number of items missing, and that many of the discrepancies are timing differences. For LED upgrades, there is sometimes a delay between the light being installed and paperwork being received to update the database.</p> <p>For Orion, the estimated under submission is 582W or 2,486 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>For Mainpower the estimated under submission is 446W or 1,905 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>CTCT will continue to work with CCC and Orion to ensure that the data in the Orion database is accurate. Please see the participant comments in the last section of this report for reasoning on the current state. CTCT believes that aside from the current LED project the controls for DUML are normally accurate to within the +/- 5% requirement</p>		27/05/20-19	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>CTCT will continue to work with all parties concerned and will perform resubmission when possible within the 14 month washup period</p>		27/05/2019	

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>Orion</p> <p>The database contains some inaccurate data:</p> <p>The database accuracy is assessed to be 88.1% indicating potential over submission of 2,617,500 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>463 lights had a recorded wattage which differed from the expected wattage, resulting in estimated over submission of 984.5W or 4,204 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>Some addresses and GPS coordinates do not reflect the physical location of the item of load.</p> <p>Mainpower</p> <p>The database contains some inaccurate data:</p> <p>The database accuracy is assessed to be 94.8% indicating potential over submission of 3,200 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>One lamp in the Mainpower database does not have a lamp model, lamp wattage or ballast wattage recorded.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</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>Controls are rated as weak overall, as they are not sufficient to ensure that all load is consistently recorded in the database, particularly for Orion customer owned lights and upgraded lights.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Many of the discrepancies are timing differences, and some have already been resolved. For LED upgrades, there is sometimes a delay between the light being installed and paperwork being received to update the database.</p> <p>A list of discrepancies has been provided to Orion and Mainpower who are working to investigate and resolve them.</p>	
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Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2 Clause 15.2 and 15.37B(c)</p> <p>From: unknown To: 14-May-19</p>	<p>Orion</p> <p>The February 2019 kW applied for submission are higher than the database extract values for February 2019 by 40.593 kW or 11,599.57 kWh based on the on hours for the month due to the inclusion of smart lights.</p> <p>ICPs 0007102594RN519 and 0007102595RN95C had RPS HHR profile recorded instead of HHR.</p> <p>The database contains some inaccurate data:</p> <p>The database accuracy is assessed to be 88.1% indicating potential over submission of 2,617,500 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>463 lights had a recorded wattage which differed from the expected wattage, resulting in estimated over submission of 984.5W or 4,204 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>Some addresses and GPS coordinates do not reflect the physical location of the item of load.</p> <p>Mainpower</p> <p>ICP 0000366751MPE2F had RPS HHR profile recorded instead of HHR.</p> <p>The database contains some inaccurate data:</p> <p>The database accuracy is assessed to be 94.8% indicating potential over submission of 3,200 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>One lamp in the Mainpower database does not have a lamp model, lamp wattage or ballast wattage recorded.</p> <p>Potential impact: High Actual impact: Medium Audit history: Twice Controls: Weak Breach risk rating: 9</p>

Audit risk rating	Rationale for audit risk rating		
<p>High</p>	<p>Controls are rated as weak overall, as they are not sufficient to ensure that all load is consistently recorded in the database, particularly for Orion customer owned lights and upgraded lights.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Many of the discrepancies are timing differences, and some have already been resolved. For LED upgrades, there is sometimes a delay between the light being installed and paperwork being received to update the database.</p> <p>A list of discrepancies has been provided to Orion and Mainpower who are working to investigate and resolve them.</p>		
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