

Compliance plan for Dunedin CC – 2019

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3 From: unknown To: 01-Feb-19	298 items of load have incorrect gear wattages recorded. Seven disconnected lights were included in the submission data. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate, because they are sufficient to ensure that the database is accurate most of the time. The impact is assessed to be medium, based on potential over submission of 1621W or 6923 kWh per annum (based on 4271 hours per annum) for incorrect database wattages, and over submission of 751W or 3,208 kWh per annum (based on 4271 hours per annum) for disconnected lights.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will work with DCC to ensure that private lights are not associated with an ICP Contact will also work with DCC to ensure their gear wattages are accurate	22/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy will complete quarterly reviews of the DCC database to ensure all information is accurate	22/05/2019	

All load recorded in database			
Non-compliance		Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 03-May-19		One light not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating		Rationale for audit risk rating	
Low		The controls are rated as strong, because one missing lamp was identified for the sample of 350 lamps checked. The impact is assessed to be low, based on 83W missing from the database.	
Actions taken to resolve the issue		Completion date	Remedial action status
Contact will work with DCC to ensure they maintain this excellent degree of accuracy in their database		22/05/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact believes that this customer has made an excellent effort in compliance and they understand their responsibilities. With that in mind, we don't believe that any preventative actions are required for 1 light. Furthermore, whilst we accept that this is a technical non compliance we dispute the validity of it and would like the authority to remove this, negligible, non compliance from their final decision		22/05/2019	

Audit trail	
Non-compliance	Description
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: unknown To: 01-Feb-19	Festive lights are recorded in an Excel spreadsheet, which does not have an audit trail. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak, because a compliant audit trail does not exist for festive lights.</p> <p>The impact is assessed to be low, because changes typically occur only once each year and can be identified by comparing the database versions.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact Energy will work with DCC to ensure there is an audit trail on this spreadsheet		22/05/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
N/A			

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 01-Feb-19	<p>298 items of load have incorrect gear wattages recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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, because they are sufficient to ensure that the database is accurate most of the time.</p> <p>The impact is assessed to be medium, based on potential over submission of 1621W or 6923 kWh per annum (based on 4271 hours per annum).</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact will work with DCC to ensure this is accurate		22/05/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact will complete quarterly database checks to ensure DCC is maintaining database accuracy		22/05/2019	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 09-May-19</p>	<p>298 items of load have incorrect gear wattages recorded.</p> <p>Seven disconnected lights were included in the submission data.</p> <p>ICPs 0000201300DE692 and 0000203111DE93D had RPS HHR profile assigned on the registry instead of HHR.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because they are sufficient to ensure that the database is accurate most of the time.</p> <p>The impact is assessed to be medium, based on potential over submission of 1621W or 6923 kWh per annum (based on 4271 hours per annum) for incorrect database wattages, and over submission of 751W or 3,208 kWh per annum (based on 4271 hours per annum) for disconnected lights.</p> <p>The impact of the inaccurate profiles is low. Volumes are submitted as HHR with the correct profiles applied.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact will work with DCC to ensure that private lights are not associated with an ICP</p> <p>Contact will also work with DCC to ensure their gear wattages are accurate</p> <p>Contact are waiting on Internal approval to apply changes to their system to ensure that the correct profile is on the Registry</p>	22/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy will complete quarterly reviews of the DCC database to ensure all information is accurate	22/05/2019	