

Compliance plan for Manawatu District Council Distributed Unmetered Load for Contact Energy Limited

Title: 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: 16-Apr-19</p>	<p>The database contains some inaccurate data.</p> <p>The field data was 94.5% of the database data for the sample checked. This will result in potential over submission of 36,600 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 14 lamps had incorrect lamp wattages recorded, and were corrected during the audit. The error resulted in under submission of 38W or 162 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Three private lights had missing model, lamp wattage and gear wattage. There was no impact on submission.</p> <p>30 festive lights had missing gear wattages. The gear wattages for these lights was expected to be zero, and there is no impact on submission.</p> <p>Seven disconnected lights were included in the submission data.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</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 lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will continue to work with the customer to ensure that their database is accurate	23/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact will ensure that quarterly checks are completed on the database to find any possible issues. Contact will also discuss regular outage patrols to ensure that all lights are being checked and any missing lights can be added to the database	23/05/2019	

Title: 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: 11-Mar-19</p> <p>To: 11-Mar-19</p>	<p>Three lamps have missing model, wattage and gear information. These are private lights which MDC is not responsible for, and are correctly excluded from submissions.</p> <p>30 festive LED lights have missing gear information. The gear is expected to be zero, and there is no impact.</p> <p>Potential impact: Low</p> <p>Actual impact: None</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>Controls are rated as moderate, as they are sufficient to ensure that most information is complete.</p> <p>There is no impact, because the total wattage was correct for the lamps with missing wattages.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>If the 3 lamps that have missing model, wattage and gear information are correctly excluded from submission – Contact disagrees that this should be included in this non compliance</p> <p>Contact will ensure that '0' gear wattage is added to the customers database for the festive lighting</p>	23/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The customer has taken all actions required of them	23/05/2019	

Title: 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: 16-Apr-19</p>	<p>The database contains some inaccurate data.</p> <p>The field data was 94.5% of the database data for the sample checked. This will result in potential over submission of 36,600 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 14 lamps had incorrect lamp wattages recorded, and were corrected during the audit. The error resulted in under submission of 38W or 162 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Three private lights had missing model, lamp wattage and gear wattage. There was no impact on submission.</p> <p>30 festive lights had missing gear wattages. The gear wattages for these lights was expected to be zero, and there is no impact on submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</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 lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will continue to work with MDC to ensure that their database is accurate	23/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact will complete quarterly checks on this database to ensure that the data is accurate	23/05/2019	

Title: 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: 16-Apr-19</p>	<p>The database contains some inaccurate data.</p> <p>The field data was 94.5% of the database data for the sample checked. This will result in potential over submission of 36,600 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 14 lamps had incorrect lamp wattages recorded, and were corrected during the audit. The error resulted in under submission of 38W or 162 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Three private lights had missing model, lamp wattage and gear wattage. There was no impact on submission.</p> <p>30 festive lights had missing gear wattages. The gear wattages for these lights was expected to be zero, and there is no impact on submission.</p> <p>Seven disconnected lights were included in the submission data. ICPs 0900087357PCBB6 and 1000560474PC712 had RPS HHR profile assigned on the registry instead of HHR.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</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 lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above. 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
Contact will continue to work with the customer to ensure the database is accurate. We don't believe that the 3 private lights should be included in this non compliance	23/05/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact will complete quarterly checks on this database to ensure that the data is accurate	23/05/2019	