

Compliance plan for Napier CC DUML – 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: 01-Oct-18</p> <p>To: 15-May-19</p>	<p>NSP profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>Ballast information in RAMM not used for submission.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</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 settlement is correct most of the time.</p> <p>The impact is assessed to medium because approx. 70,000 kWh per annum is submitted in the incorrect time period due to use of the incorrect profile.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will investigate whether the potential for a "Profile" to be developed is possible. Due to the non-standard nature, Genesis believes if a UML profile is applied, it too will allocate the volume across incorrect time periods making it non-compliant and disadvantaging the energy supplier. Genesis will be requesting the additional ballast information to be added into the RAMM database.	01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will be reviewing this unusual scenario of half night lighting on carriage ways, for this region. Genesis will need to understand clearly how these lights are managed and whether there is sufficient evidence to substantiate a submission for a new profile.	01/09/2019	

ICP identifier and items of load			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 01-Oct-18</p> <p>To: 13-May-19</p>	<p>ICP identifiers in the database not correct.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak because the design of the database does not ensure ICP identifiers are correct.</p> <p>The audit risk rating is low because the total kWh is correct and there is only one relevant GXP.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The private lighting has been investigated and where the council has deemed the private light to be a council asset they have correct the information. Where the lighting has been deemed private. This is a distributor issue and will need to be addressed by the distributor.</p> <p>Incorrect ICP will need to be analysed to support the request to the council to make the change to attach the ICP to the lamp rather than the pole.</p>		01/09/2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis requested the private lighting be investigated, in which it has been done. The assets have been identified and the council's contractor is in the process of change. Future private lighting will be the responsibility of the distributor to maintain.</p>		01/09/2019	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Oct-18 To: 13-May-19	One item of load not recorded in the database. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor because only one light was identified; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
The audit process has identified the missing asset. Genesis have requested this to be added.		01/07/2019	
Preventative actions taken to ensure no further issues will occur		Completion date	
The council's contractor has been made aware of the missing item and will be correcting the dataset.		01/07/2019	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Oct-18</p> <p>To: 15-May-19</p>	<p>NSP profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>Potential impact: High</p> <p>Actual impact: High</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 settlement is accurate most of the time.</p> <p>The impact is assessed to medium because approx. 70,000 kWh per annum is submitted in the incorrect time period due to use of the incorrect profile.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will investigate whether the potential for a "Profile" to be developed is possible. Due to the non-standard nature, Genesis believes if a UML profile is applied, it too will allocate the volume across incorrect time periods making it non-compliant and disadvantaging the energy supplier.</p> <p>Genesis will be requesting the additional ballast information to be added into the RAMM database.</p>	01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis will be reviewing this unusual scenario of half night lighting on carriage ways, for this region. Genesis will need to understand clearly how these lights are managed and whether there is sufficient evidence to substantiate a submission for a new profile.</p>	01/09/2019	