Compliance plan for NZTA Waipukurau – 2019

Distributed unmetered load audits	
Non-compliance	**Description**
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 01-Mar-19 To: 15-Mar-19	The DUML audit was not submitted to the EA by its due date, 01/03/2019. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as strong, audits are started early to ensure that they are completed on time, but there was a delay in obtaining database information. The impact is assessed to be low, because the audit was completed soon after it was due.

Actions taken to resolve the issue	Completion date	Remedial action status
We acknowledge this non-compliance. The audit was undertaken as soon as possible once database information was made available.	19 March 2019	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

Deriving submission information	
Non-compliance	**Description**
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: unknown To: 25-Feb-19	Four items of load have missing lamp or ballast wattages, and 84 items of load have incorrect lamp or ballast wattages. This will result in potential under recording of 381W or 1,627 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). Differences between the wattage used for submission, wattage recorded in the database could result in 4,189 kWh per annum of over submission. Potential impact: Low Actual impact: Unknown Audit history: Twice Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak, because the database contains some inaccurate information and is not used for submission. The impact is assessed to be low based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
NZTA are undertaking an LED upgrade program in the Hawkes Bay area. As part of the upgrade they will be ensuring that all lights in the database have the correct ICP, owner and wattage assigned. We have been advised that this program is likely to take at least a year to complete. This program will resolve all inaccuracy identified with current database information. The wattage we are currently using for submission is based on an estimate of the correct database wattage that was included in the last audit report for this database. We consider that this is likely more accurate than using the current database information that is also not accurate due to the missing and incorrect wattage information noted in this report.	01 June 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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: 08-Mar-19	The ICP is not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
Low	Controls are rated as weak, as the ICP number is not recorded for any item of load. The impact is low, because all items of load relate to the same ICP.

Actions taken to resolve the issue	Completion date	Remedial action status
NZTA are undertaking an LED upgrade program in the Hawkes Bay area. As part of the upgrade they will be ensuring that all lights in the database have the correct ICP, owner and wattage assigned. We have been advised that this program is likely to take at least a year to complete. This program will resolve all inaccuracy identified with current database information.	01 June 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

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: 25-Feb-19	Three items of load have missing lamp wattages, and one item of load has a missing gear wattage. Potential impact: High Actual impact: Low Audit history: Twice 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 make, model, lamp and wattage recorded. The impact is low, because the database is not currently used for submission, and 268W are missing from the database.

Actions taken to resolve the issue	Completion date	Remedial action status
NZTA are undertaking an LED upgrade program in the Hawkes Bay area. As part of the upgrade they will be ensuring that all lights in the database have the correct ICP, owner and wattage assigned. We have been advised that this program is likely to take at least a year to complete. This program will resolve all inaccuracy identified with current database information.	01 June 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

Database accuracy	
Non-compliance	**Description**
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 25-Feb-19	Four items of load have missing lamp or ballast wattages, and 84 items of load have incorrect lamp or ballast wattages. This will result in potential under recording of 381W or 1,627 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). None of the items of load have an ICP number recorded. Potential impact: High Actual impact: Low Audit history: Twice 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 based on the wattage differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
NZTA are undertaking an LED upgrade program in the Hawkes Bay area. As part of the upgrade they will be ensuring that all lights in the database have the correct ICP, owner and wattage assigned. We have been advised that this program is likely to take at least a year to complete. This program will resolve all inaccuracy identified with current database information. The wattage we are currently using for submission is based on an estimate of the correct database wattage that was included in the last audit report for this database. We consider that this is likely more accurate than using the current database information that is also not accurate due to the missing and incorrect wattage information noted in this report.	01 June 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	

Volume information accuracy	
Non-compliance	**Description**
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: unknown To: 25-Feb-19	Four items of load have missing lamp or ballast wattages, and 84 items of load have incorrect lamp or ballast wattages. This will result in potential under recording of 381W or 1,627 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). Differences between the wattage used for submission, wattage recorded in the database could result in 4,189 kWh per annum of over submission. Potential impact: Low Actual impact: Unknown Audit history: Twice Controls: Weak Breach risk rating: 3
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak, because the database contains some inaccurate information and is not used for submission. The impact is assessed to be low based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
NZTA are undertaking an LED upgrade program in the Hawkes Bay area. As part of the upgrade they will be ensuring that all lights in the database have the correct ICP, owner and wattage assigned. We have been advised that this program is likely to take at least a year to complete. This program will resolve all inaccuracy identified with current database information. The wattage we are currently using for submission is based on an estimate of the correct database wattage that was included in the last audit report for this database. We consider that this is likely more accurate than using the current database information that is also not accurate due to the missing and incorrect wattage information noted in this report.	01 June 2020	Identified
Preventative actions taken to ensure no further issues will occur	**Completion date**	