

Compliance plan for Porirua 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-Jan-18</p> <p>To: 05-Nov-18</p>	<p>Potential over submission of 62,220 kWh p.a. due to incorrect on/off times.</p> <p>Potential under submission of 18,977 kWh p.a. due to incorrect wattages.</p> <p>Incorrect use of CST profile.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates not recorded for new connections.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in Section 3.1.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances detailed above.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis has a recommendation that the EA publishes New Zealand regional burn hours to gain consistency for all traders to utilise when determining submission volumes for DUML asset load calculation processes.</p> <p>For Genesis to use another source of <u>accepted</u> night hours (assumed on times) for July 2019, 31 days @ 11.7 daily average burn hours equates to 362.7, the data logger only associated with ICP 0001255308UN5C4 equates to 447.37 and the Astronomical Society night hours profile to 465 burn hours respectively, which as stated Astronomical Society night hours is 4% higher than the data logger, however the EA acceptable daily average equates to 23.33% less than the data logger for that period.</p> <p>Genesis has been proactive and used the a more accurate depiction of night hours for the submission period in that region and being that burn hours change seasonally and an assumed annual "ON TIME" of 4271 hours is an <u>average</u> of</p>		01/03/2020
		Investigating

<p>11.7 which is not an accurate measure of any one season or period, albeit it seems to meet compliance.</p> <p>Genesis will be working with PCC and the distributor around livening dates and light/lamp install dates to align with the recent memo on the DUML Guidelines.</p> <p>Genesis will be reviewing the RAMM dataset to help them identify and correct errors within their dataset.</p>		
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis will discuss the use the 11.7 burn to align Genesis's calculation processes to the EA audit guidelines. Albeit feel these are inaccurate and will drive inaccuracies in submission volumes over seasonality's, although accuracy is met annually.</p> <p>Genesis will need to advise PCC and their third-party contractors of their responsibilities when replacing and livening new assets.</p>	01/03/2020	

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-Jan-18</p> <p>To: 02-Sep-19</p>	<p>48 items of load do not have an ICP number recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 because almost all items of load have an ICP number recorded.</p> <p>The impact is rated as low, as a very small number of items of load are affected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the missing information and will request the council to accurately populate the correct ICP in the dataset.	31/12/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis reviews the information provided by PCC. Genesis has been working with PCC to realign their data set with the council requirements and will advise of any potential updates/corrections.	31/12/2019	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Jan-18 To: 02-Sep-19	One item of load does not have sufficient location information to enable it to be readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong and the impact as low, because only one exception was identified.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the missing information and will request the council to accurately populate the correct locational details (northing/Easting) in the dataset.	31/12/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis reviews the information provided by PCC. Genesis has been working with PCC to realign their data set with the council requirements and will advise of any potential updates/corrections.	31/12/2019	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Jan-18 To: 02-Sep-19	26 lights have blanks in all fields containing lamp descriptions. 69 lights have zero lamp wattages recorded. 4 lights have zero gear wattages recorded Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because most lamps have description and wattage information recorded but there is room for improvement. PCC has been working to populate the missing information. The audit risk rating is low based on the small volume of lights affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will advise PCC of the necessary corrections and the requirements for all new connections, lamp replacements.		31/12/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis reviews the information provided by PCC. Genesis has been working with PCC to realign their data set with the council requirements and will advise of any potential updates/corrections.		31/12/2019	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 02-Sep-19	Eight additional lamps in the field but were not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to ensure most lights are recorded in the database. The impact is rated as low, as only 8 lights were missing from the database.	
Actions taken to resolve the issue	Completion date	Remedial action status
The work PCC has managed to do to update their dataset has meant that there are minimal missing lamp discrepancies. Genesis will advise PCC of these and have them updated in the database. Additional Asset on Seascapes View is deemed to be private and is not the council responsibility. The 1 x PCC asset on Seascapes View is recorded accurately in the database with Porirua City Council as the owner. Genesis believes the missing asset on Resolution is counted as part of Optimist Way (5 lamps including the corner lamp on Resolution Dr) Genesis note that the differences in the wattage (35.5w) that the manufacturers descriptions have been entered by the contractor. Genesis will request these to be rounded up to 36w and updated into the database.	31/12/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will advise PCC of the necessary corrections and requirements for new connections.	31/12/2019	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jan-18</p> <p>To: 02-Sep-19</p>	<p>1,261 examples of incorrect or incomplete description or capacity information.</p> <p>Database is not confirmed as accurate with a 95% level of confidence.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates not recorded for new connections</p> <p>Some light owner discrepancies</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Inform the distributor of best practice to avoid further non-compliance on behalf of Genesis customer regarding the livening of assets unknown to the trader.</p> <p>Work with the council and influence process change, review current dataset to assist in asset ownership realignment, request field visits on assets identified as missing and have included if deemed valid.</p>	01/02/2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis needs to educate the council and third-party contractors on the asset change management process.</p> <p>Genesis will need to enquire with the distributor as to how their new connection process is managed, as the developer should be responsible for the lighting until the council take ownership. Notification to the trader for acceptance of new load is required to complete the process.</p> <p>Genesis would expect the light install date in RAMM be the correct field for the livening date, as the lamp install date will cater for any change in asset.</p>	01/02/2020	

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-Jan-18</p> <p>To: 02-Sep-19</p>	<p>Potential over submission of 62,220 kWh p.a. due to incorrect on/off times.</p> <p>Potential under submission of 18,977 kWh p.a. due to incorrect wattages.</p> <p>Incorrect use of CST profile.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates not recorded for new connections.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in Section 3.1.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
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