Compliance plan for Taupo DC DUML Audit – 2019

Deriving submission information	
Non-compliance	**Description**
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Nov-18 To: 30-Apr-19	Incorrect figures used in the Trustpower internal database for reconciliation is potentially resulting in an estimated over submission of 262,000 kWh per annum. Unknown impact on reconciliation for 351 items of load where a TDC DUML ICP is recorded against them but are excluded from reconciliation. Three items with no ICP recorded resulting in an estimated under submission of 2,153 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 29 items of load with the incorrect ballast recorded resulting in an estimated over submission of 3,724kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 33 items of load with zero ballast applied where a ballast should be recorded resulting in an estimated minor annual under submission of 884 kWh. Potential impact: High Actual impact: High Audit history: Twice previously Controls: Weak Breach risk rating: 9
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak as the number of discrepancies found indicate that whilst controls are in place, they are not identifying errors as expected The impact is assessed to be high due to the potential kWh variances found.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**
Have asked TDC to arrange program to validate database.	By 31st August	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Have asked TDC to arrange program to validate database.	By 31st August	

ICP Identifier	
Non-compliance	**Description**
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 01-May-18 To: 31-Oct-18	Three items with no ICP recorded resulting in an estimated under submission of 2,153 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). Potential impact: Low 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 the issues identified are historic and once resolved I expect the controls to move to strong. The impact is assessed to low based on the estimated volume of under submission.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**
Have asked TDC to arrange program to validate database.	By 31st August	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Have asked TDC to arrange program to validate database.	By 31st August	

Location of each item of load	
Non-compliance	**Description**
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Nov-18 To: 30-Apr-19	Three items of load with insufficient details recorded to locate them. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as moderate as all but three items of load have locatable details. The impact is assessed to low as these items of load are being reconciled.

Actions taken to resolve the issue	Completion date	Remedial action status
Have requested TDC to update database with details	By 31st August	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Have requested TDC to update database with details	By 31st August	

Description and capacity of each item of load	
Non-compliance	**Description**
Audit Ref: 2.4 With: Clause 11(2) (d) of Schedule 15.3 From: 01-Nov-18 To: 30-Apr-19	33 items of load with zero ballast applied where a ballast should be recorded resulting in an estimated minor annual under submission of 884 kWh. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as moderate as the issues identified are historic and once resolved I expect the controls to move to strong. The impact is assessed to be low, as the impact of the incorrect ballasts is low.

Actions taken to resolve the issue	Completion date	Remedial action status
Have requested TDC to update database with details	Immediately	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Have requested TDC to update database with details	Immediately	

All load recorded in the database	
Non-compliance	**Description**
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Nov-18 To: 30-Apr-19	All load is not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2
Audit risk rating	**Rationale for audit risk rating**
Low	The controls are rated as moderate as the processes to capture change will mitigate risk most of the time. The impact is assessed to be low as the majority of the volume of additional lighting found in the sample was small and the database was within the accuracy thresholds.

Actions taken to resolve the issue	**Completion date**	**Remedial action status**
Database validation will correct this issue.	By 31st August	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Database validation will correct this issue.	By 31st August	

Database accuracy			
Non-compliance	**Description**		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Nov-18 To: 30-Apr-19	29 items of load with the incorrect ballast recorded resulting in an estimated over submission of 3,724kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 33 items of load with zero ballast applied where a ballast should be recorded resulting in an estimated minor annual under submission of 884 kWh. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Moderate Breach risk rating: 2		
Audit risk rating	**Rationale for audit risk rating**		
Low	The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time. 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**
TDC will rectify the gear wattage		Immediately	Identified
Preventative actions taken to ensure no further issues will occur		**Completion date**	
TDC will rectify the gear wattage		Immediately	

Volume information accuracy	
Non-compliance	**Description**
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Nov-18 To: 30-Apr-19	Incorrect figures used in the Trustpower internal database for reconciliation is potentially resulting in an estimated over submission of 262,000 kWh per annum. Unknown impact on reconciliation for 351 items of load where a TDC DUML ICP is recorded against them but are excluded from reconciliation. Three items with no ICP recorded resulting in an estimated under submission of 2,153 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 29 items of load with the incorrect ballast recorded resulting in an estimated over submission of 3,724kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). 33 items of load with zero ballast applied where a ballast should be recorded resulting in an estimated minor annual under submission of 884 kWh. Potential impact: High Actual impact: High Audit history: Twice previously Controls: Weak Breach risk rating: 9
Audit risk rating	**Rationale for audit risk rating**
High	The controls are rated as weak as the number of discrepancies found indicate that whilst controls are in place, they are not identifying errors as expected The impact is assessed to be high due to the potential kWh variances found.

Actions taken to resolve the issue	Completion date	Remedial action status
Have asked TDC to arrange to validate database.	By 31st August	Investigating
Preventative actions taken to ensure no further issues will occur	**Completion date**	
Have asked TDC to arrange to validate database and maintain updates in a timely manner.	Ongoing	