

## Compliance plan for Wellington CC – 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-Dec-18</p> <p>To: 31-Jan-19</p>	<p>Some submission data was incorrect in December 2018 and January 2019:</p> <ul style="list-style-type: none"> <li>• Christmas lights (1,037W) were not included in the submission data; and</li> <li>• volumes were under reported by 711 kWh in December 2018 and 567 kWh in January 2019 for ICP 1001152336CK141.</li> </ul> <p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> <li>• The field data was 85.2% of the database data for the sample checked. This will result in potential over submission of 906,800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUMML database auditing tool).</li> <li>• 347 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer's specifications available. The impact of these differences is estimated to be 4,585W or approximately 19,583 kWh per annum under submission (based on annual burn hours of 4,271 as detailed in the DUMML database auditing tool).</li> <li>• 24 items of load have missing, incomplete or unknown lamp wattages and descriptions, and 17 items of load have missing, incomplete or unknown gear wattages and descriptions. The impact is estimated to be 1,521W or approximately 6,494 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUMML database auditing tool).</li> <li>• Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies, but is expected to be low.</li> <li>• Static dimming was not correctly applied for 193 of the 8,011 statically dimmed lamps. The impact is expected to be at least 3,368W or approximately 14,384 kWh per annum under submission (based on annual burn hours of 4,271 as detailed in the DUMML database auditing tool).</li> <li>• 65 Christmas lights do not have ICP numbers recorded.</li> </ul> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>

Audit risk rating	Rationale for audit risk rating		
<p><b>High</b></p>	<p>Overall the controls are rated as weak, primarily due to the database accuracy issues discussed further in <b>section 3.1</b>. Controls over the submission process itself are moderate, as some errors and omission of Christmas lights has occurred.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Revised submission data will be provided to resolve the submission issues.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis have advised that all Christmas lighting will need to be addressed. The ICP will need to be assigned and Genesis will require to supply corrected revision data to the market for the Dec-18/Jan-19 periods.</p> <p>Genesis has also requested the assets to be reviewed and the necessary data corrections made to lamp information that has not been updated in the dataset but upgraded in the field. This is to restore dataset integrity and alleviate the annual estimated over submission being reported.</p> <p>Genesis have requested all non-LED lamps in the dataset to be reconfirmed.</p>		01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> <li>When Christmas lighting is supplied, it is Genesis process to include them in the volume calculation process. This has not been met and Genesis will review this process. Being that the ICP was missing would have contributed to the miss calculation of the volume in the volume calc procedures. The Volumes for ICP 1001152336CK141, have already been addressed and revisions will correct submitted volumes.</li> <li>Genesis energy relies on the internal processes of WCC to ensure asset information is true and accurate. Genesis will request these processes to be reviewed.</li> </ul>		01/03/2019	

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: 31-Jan-19	ICP number is not recorded for 65 Christmas lights. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong because 18,815 (99.7%) of the 18,880 items of load are compliant. The impact is low, because the total wattage is 1,037W and Christmas lights are only connected for a small portion of the year.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have advised that all Christmas lighting will need to be addressed. The ICP will need to be assigned and Genesis will supply corrected revision data to the market for the Dec-18/Jan-19 periods.	01/07/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<ul style="list-style-type: none"> <li>When Christmas lighting is supplied, it is Genesis process to include them in the volume calculation process. This has not been met and Genesis will review this process. Being that the ICP was missing would have contributed to the miss calculation of the volume in the volume calc procedures. Genesis confirms this lighting has been included in revisions and internal procedure is in effect.</li> </ul>	01/03/2019	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clauses 11(2)(c) and (d) of Schedule 15.3  From: unknown To: 31-Jan-19	Some description and capacity information is incomplete or unknown, including: <ul style="list-style-type: none"> <li>• 23 lamp wattages and descriptions; and</li> <li>• 17 gear wattages and descriptions.</li> </ul> Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as moderate, as they are sufficient to ensure that almost all items of load have wattage and description information recorded.  The impact is estimated to be low, based on the information available.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has requested the exceptions to be addressed in the dataset.	01/07/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will be defaulting consumption if missing attributes are found. Genesis will also send exception reporting back to the customer to rectify.	01/05/2019	

<b>Database accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 31-Jan-19</p>	<p>The database contains some inaccurate data.</p> <p>The field data was 85.2% of the database data for the sample checked. This will result in potential over submission of 906,800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>347 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer's specifications available. The impact of these differences is estimated to be 4,585W or approximately 19,583 kWh under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>24 items of load have missing, incomplete or unknown lamp wattages and descriptions, and 17 items of load have missing, incomplete or unknown gear wattages and descriptions. The impact is estimated to be 1,521W or approximately 6,494 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies, but is expected to be low.</p> <p>Static dimming was not correctly applied for 193 of the 8,011 statically dimmed lamps. The impact is expected to be at least 3,368W or approximately 14,384 kWh under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>65 Christmas lights do not have ICP numbers recorded.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>High</b>	<p>The controls are rated as weak, because they are not sufficient to ensure that database wattage is consistently accurate. WCC intends to take action to resolve the issues.</p> <p>The impact is assessed to be high based on the wattage differences described above.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
As per sections 2.1, 2.2, 2.4 Genesis has raised these issues with WCC. Genesis is expecting WCC to be proactive in providing solutions for the exceptions within expected time frames.	01/09/2019	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with Wellington Electricity to assist in the database accuracy. Genesis does rely on the customer and its multiple 3 <sup>rd</sup> party contractors to ensure information is populated accurately within RAMM. Genesis Energy's only means of preventative maintenance is to continuously work with the council when exceptions are identified.	01/03/2019	

Database accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p>	<p>Some submission data was incorrect in December 2018 and January 2019:</p> <ul style="list-style-type: none"> <li>• Christmas lights (1,037W) were not included in the submission data; and</li> <li>• volumes were under reported by 711 kWh in December 2018 and 567 kWh in January 2019 for ICP 1001152336CK141.</li> </ul> <p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> <li>• The field data was 85.2% of the database data for the sample checked. This will result in potential over submission of 906,800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• 347 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer's specifications available. The impact of these differences is estimated to be 4,585W or approximately 19,583 kWh under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• 24 items of load have missing, incomplete or unknown lamp wattages and descriptions, and 17 items of load have missing, incomplete or unknown gear wattages and descriptions. The impact is estimated to be 1,521W or approximately 6,494 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies, but is expected to be low.</li> </ul>

<p>From: 01-Dec-18 To: 31-Jan-19</p>	<ul style="list-style-type: none"> <li>• Static dimming was not correctly applied for 193 of the 8,011 statically dimmed lamps. The impact is expected to be at least 3,368W or approximately 14,384 kWh under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• 65 Christmas lights do not have ICP numbers recorded.</li> </ul> <p>Potential impact: High Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>High</b></p>	<p>Overall the controls are rated as weak, primarily due to the database accuracy issues discussed further in <b>section 3.1</b>. Controls over the submission process itself are moderate, as some errors and omission of Christmas lights has occurred.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Revised submission data will be provided to resolve the submission issues.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>As per sections 2.1, 2.2, 2.4, 3.1 Genesis has raised these issues with WCC. Genesis is expecting WCC to be proactive in providing solutions for the exceptions within expected time frames.</p>	<p>01/09/2019</p>	<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis continues to work with Wellington Electricity to assist in the database accuracy. Genesis does rely on the customer and its multiple 3<sup>rd</sup> party contractors to ensure information is populated accurately within RAMM. Genesis Energy's only means of preventative maintenance is to continuously work with the council when exceptions are identified.</p>	<p>01/03/2019</p>	