Compliance plan for Clutha DC – 2019

Distributed unmetered load audits			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26	Audit conducted late. Potential impact: Medium		
and 17.295F	Actual impact: Low		
From: 01-Jun-18 To: 08-Sep-19	Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because Meridian was actively working with CDC to obtain a database.		
	The impact on settlement and participants is minor; therefore, the audit risk rating is low.		erefore, the audit risk
Actions taken to resolve the issue		Completion date	Remedial action status
Meridian began trading this DUML in April 19 and had the audit conducted as soon as the database was available.		Aug 2019	Cleared
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	In absolute terms, total annual consumption is estimated to be 16,800 kWh higher than the DUML database indicates. Submission is based on a snapshot and does not consider historic adjustments. Potential impact: Medium Actual impact: Medium		
From: 01-Jun-18	Audit history: None		
To: 09-Sep-19	Controls: Moderate		
	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is moderate; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Once the updated RAMM data has been received by CDC from McKay Ltd who is carrying out the LED retrofit, most of the anomalies identified relating to SoN's vs LED's should be rectified.		March 2020	Identified
CDC also plans to conduct a full field inspection on completion of the roll out to ensure database accuracy.			
Preventative actions taken to ensure no further issues will occur		Completion date	

Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3	2 items of load with insufficient location details.		
With: Clause 11(2)(b)	Potential impact: Low		
of Schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 01-Jun-18	Controls: Strong		
To: 08-Sep-19	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as strong because a complete field audit was conducted recently to populate the database, and this is a minor error.		
	The impact on settlement and participants is minor; therefore, the audit risk rating is low.		erefore, the audit risk
Actions taken to resolve the issue		Completion date	Remedial action status
CDC are following up with their contractor regarding correction of the missing location information		31 Dec 2019	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	22 items of load with blank lamp wattage, gear wattage and description of load.		
With: Clause 11(2)(c)	Potential impact: Medium		
and (d) of Schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 01-Jun-18	Controls: Weak		
To: 08-Sep-19	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak because monitoring is not in place for database discrepancies. The impact on settlement and participants is minor; therefore, the audit risk rating is low. If the lights are assumed to be 24W LED, the under submission will be 2,255 kWh p.a.		
Actions taken to resolve the issue		Completion date	Remedial action status
CDC are following up with their contractor regarding correction of the missing information for these items of load.		31 Dec 2019	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	2 lights in the field not recorded in the database.		
With: Clause 11(2A) of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 01-Jun-18	Controls: Moderate		
To: 08-Sep-19	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate. A complete field audit was conducted and there were only two discrepancies found.		
	The impact is low because only two examples were found.		
Actions taken to resolve the issue		Completion date	Remedial action status
CDC are following up with their contractor regarding the missing lamps.		31 Dec 2019	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	In absolute terms, total annual consumption is estimated to be 16,800 kWh higher than the DUML database indicates.		
15.37B(b)	The database contains incorrect ballast wattage, but these are corrected prior to submission.		
	22 items of load do not have make, model, lamp wattage or gear wattage recorded		
	Two items of load do not have GPS coordinates and there is insufficient detail in the address field to locate them.		
	Potential impact: High		
From: 01-Jun-18	Actual impact: Medium		
To: 09-Sep-19	Audit history: None		
Controls: Moderate			
	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is moderate; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Once the updated RAMM data has been received by CDC from McKay Ltd who is carrying out the LED retrofit, most of the anomalies identified relating to SoN's vs LED's should be rectified.		Mar 2020	Identified
CDC also plans to conduct a full field inspection on completion of the roll out to ensure database accuracy.		31 Dec 2019	
Missing location and capacity information is being followed up for correction.		31 500 2013	
CDC are investigating options for adding the NZTA lighting to the RAMM database with their contractor and NZTA.		June 2020	
Preventative actions to	aken to ensure no further issues will occur	Completion date	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 15.2 and	In absolute terms, total annual consumption is estimated to be 16,800 kWh higher than the DUML database indicates. Submission is based on a snapshot and does not consider historic adjustments.		
15.37B(c)			
	Potential impact: Medium		
	Actual impact: Medium		
From: 01-Jun-18	Audit history: None		
To: 09-Sep-19	Controls: Moderate		
	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is moderate; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
Once the updated RAMM data has been received by CDC from McKay Ltd who is carrying out the LED retrofit, most of the anomalies identified relating to SoN's vs LED's should be rectified.		March 2020	Identified
CDC also plans to conduct a full field inspection on completion of the roll out to ensure database accuracy.			
Preventative actions taken to ensure no further issues will occur		Completion date	