

Compliance plan for Nelson CC DUML – 2019

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown To: 06-Sep-19</p>	<p>Annual under submission of approx. 121,186, due to lack of submission for NZTA lighting.</p> <p>The field audit finding is that the total annual consumption is estimated to be 25,800 kWh lower than the DUML database indicates, as recorded in section 3.1.</p> <p>Zero wattage for three lights.</p> <p>Two records without an ICP.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak, because they are not sufficient to ensure that database wattage is accurate.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>	
Actions taken to resolve the issue		Completion date
<p>NZTA thought that they should be billed from NCC for these lights but they have never received any accounts thus far. Trustpower are in talks with NCC and NZTA to sort this matter, We do not accept the auditors finding that Trustpower has under submitted data for the NZTA load. as neither Trustpower or Nelson City Council have any responsibility for the NZTA load. The NZTA contractor has included them incorrectly against our ICP.</p>		30/11/2019
Preventative actions taken to ensure no further issues will occur		Completion date
We will assist NZTA in resolving this issue		30/11/2019
Remedial action status		
Disputed		

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: 04-Jul-19 To: 02-Sep-19	Two items of load did not have an ICP number recorded. Potential impact: Low Actual impact: Low Audit history: Once 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 an ICP number recorded. The impact is low because only two items of load are affected, and the wattage is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
This a DB issue and will be sorted by Powertech	8/10/2019	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Both Powertech and TP to check on a monthly basis	8/10/2019	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-May-18 To: 06-Sep-19	Three items of load have unknown or blank lamp model, and zero wattage. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong because they mitigate risk to an acceptable level. The impact is low, because there only three items of load with incorrect data.	
Actions taken to resolve the issue	Completion date	Remedial action status
For Powertech to check DB to ensure what is actually in field	31/10/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Powertech has responsibility to maintain the S/L DB. This will be remedied and DB updated	31/10/2019	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-May-18 To: 06-Sep-19</p>	<p>In absolute terms, total annual consumption is estimated to be 25,800 kWh lower than the DUML database indicates. 3 items of load have zero wattage. 2 items of load did not have ICP identifiers. Potential impact: High Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because they are sufficient to ensure that database wattage is accurate most of the time. The impact is assessed to be medium, because over submission may be occurring of approx. 25,800 kWh per annum based on the database accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
On checking with both Nelson Electricity and NCC these private lights should be accounted for in the DB as NCC then on bills the people concerned. They are not separately metered	8/11/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once these have been added to the monthly total on the DB this shouldn't be an ongoing issue	8/11/2019	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 06-Sep-19</p>	<p>Annual under submission of approx. 121,186, due to lack of submission for NZTA lighting.</p> <p>The field audit finding is that the total annual consumption is estimated to be 25,800 kWh lower than the DUML database indicates, as recorded in section 3.1.</p> <p>Zero wattage for three lights.</p> <p>Two records without an ICP.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak, because they are not sufficient to ensure that database wattage is accurate.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
NZTA thought that they should be billed from NCC for these lights but they have never received any accounts thus far. Trustpower are in talks with NCC and NZTA to sort this matter, We do not accept the auditors finding that Trustpower has under submitted data for the NZTA load. as neither Trustpower or Nelson City Council have any responsibility for the NZTA load. The NZTA contractor has included them incorrectly against our ICP.	30/11/2019	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
We will assist NZTA in resolving this issue	30/11/2019	