

Compliance plan for Buller DC DUML – 2019

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-May-18 To: 30-Nov-19</p>	<p>The registry daily kWh figure is used for submission and this does not track change daily as required by the code resulting in an estimated under submission of approx. 3,708kWh per annum.</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Twice previously Controls: Weak Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as no database reports have been provided but note that with the RAMM database being used the control rating will improve.</p> <p>The impact is assessed to be low due to the estimated minor amount of under submission described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Buller DC has provided a database report and we are confirming a process for providing this monthly.</p>		31 Dec 2019	Identified
<p>We will revise any historic submissions when we have confirmed whether the 7 items of missing NZTA load need to be included and that the other discrepancies found during the field audit have been corrected.</p>		28 Feb 2019	
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Provision of a monthly database report will ensure materially accurate information is used for settlement going forward.</p>			

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-May-18 To: 30-Nov-19	Seven NZTA items of load missing from the BDC RAMM database resulting in an estimated annual under submission of 3,408 kWh if used for submission. 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 BDC are working to rectify this. The impact is assessed to be low due to the estimated amount of under submission described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will follow up with BDC re the seven items of NZTA load not recorded in the database to establish whether this needs to be added. We will pass the minor discrepancies identified during the field audit to Buller for correction	31 Dec 2019	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-May-18 To: 30-Nov-19	Seven NZTA items of load missing from the BDC RAMM database resulting in an estimated annual under submission of 3,408 kWh if used for submission. 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 BDC are working to rectify this. The impact is assessed to be low due to the estimated amount of under submission described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will follow up with BDC re the seven items of NZTA load not recorded in the database to establish whether this needs to be added.	31 Dec 2019	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	

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-May-18</p> <p>To: 30-Nov-19</p>	<p>The registry daily kWh figure is used for submission and this does not track change daily as required by the code resulting in under submission of approx. 3,708kWh per annum.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as no database reports have been provided but note that with the RAMM database being used the control rating will improve.</p> <p>The impact is assessed to be low due to the estimated minor amount of under submission described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Buller DC has provided a database report and we are confirming a process for providing this monthly.</p>		31 Dec 2019	Identified
<p>We will revise any historic submissions when we have confirmed whether the 7 items of missing NZTA load need to be included and that the other discrepancies found during the field audit have been corrected.</p>		28 Feb 2019	
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Provision of a monthly database report will ensure materially accurate information is used for settlement going forward.</p>			