Compliance plan for Hutt City Council DUML 2019

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1 With: Clause 11(1) of	The database is not confirmed as accurate with a 95% level of confidence as recorded in section 3.1 .			
Schedule 15.3	23 items of load do not have model or wattage information recorded.			
	14 items of load have inaccurate wattage	es recorded.		
	47 items of load do not have ICP numbers recorded in the database. Six items of load had incorrect ICP numbers recorded in the database and were corrected during the audit.			
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.			
Livening dates are not recorded for new connections, and change dates made.			change dates may not	
	Potential impact: High			
	Actual impact: Unknown			
From: 01-Oct-19	Audit history: Once			
To: 31-Oct-19	Controls: Weak			
	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls over the database are rated	l as weak.		
	Based on the field audit findings there appear to be delays in entering updated light information (e.g. SON lights in the database when LEDs were present on the street), and some issues with information accuracy (e.g. different LED lights recorded in the database to in the field). The update process will not necessarily ensure that the correct change date is recorded where an existing light is changed. The audit risk rating is high based on kWh variances discussed in section 3.1.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Contact will work with HCC to update their database to ensure accuracy of model/wattage and correct ICP number		Ongoing	Identified	
Contact will work with the customer to ensure that they are setup to deliver their data for any given time, as required by the EA				
Contact will work with HCC to ensure that their process for New Connections reflects actual usage.				

Preventative actions taken to ensure no further issues will occur	Completion date
Contact will complete quarterly database checks to ensure the accuracy of HCC's database	Ongoing

ICP identifier and items of load				
Non-compliance	Description			
Audit Ref: 2.2	46 unmetered items of load do not have an ICP number assigned.			
With: Clause 11(2)(a)	Potential impact: Medium			
and (aa) of Schedule	Actual impact: Medium			
From: 01-Oct-19	Audit history: None			
To: 31-Oct-19	Controls: Moderate			
	Breach risk rating: 4			
Audit risk rating	Rationale for audit risk rating			
Medium	The controls over the database are rated as moderate. The missing ICP for object ID 14238 occurred due to an oversight, and invalid ICP numbers for Properties UrbanPlus related to a specific group of lights and did not affect the wider database. The impact is assessed to be medium. The total wattage not recorded against an ICP number is 2709 W or 11,570 kWh per annum based on 4,271 burn hours.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Contact will work with HCC to ensure that they have the correct ICP added for each item of unmetered load		Ongoing	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Contact will complete quarterly database checks to ensure the accuracy of HCC's database		Ongoing		

Description and capacity of load				
Non-compliance	Description			
Audit Ref: 2.4	23 items of load do not have model or wattage information recorded.			
With: Clause 11(2)(c)	Potential impact: Low			
and (d) of Schedule	Actual impact: None			
13.3	Audit history: Once			
From: 01-Oct-19 Controls: Moderate				
To: 31-Oct-19	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 lamp information is correctly recorded most of the time. The impact is assessed to be low, because a small 23 lamps are affected, and the wattage is expected to be low.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Contact will work with HCC to ensure their data is accurate		Ongoing	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Contact will complete quarterly database checks to ensure the accuracy of HCC's database		Ongoing		

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1	The database is not confirmed as accurate with a 95% level of confidence.			
With: Clause 15.2 and	23 items of load do not have model or wattage information recorded.			
15.37B(b)	14 items of load have inaccurate wattag	es recorded.		
	47 items of load do not have ICP numbers recorded in the database.			
	Six items of load had incorrect ICP numbers recorded in the database and were corrected during the audit.			
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.			
	Livening dates are not recorded for new connections, and change dates may not reflect the date the change is made. Potential impact: High			
	Actual impact: Unknown			
	Audit history: Once			
From: 01-Oct-19	From: 01-Oct-19 Controls: Weak			
To: 31-Oct-19	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls over the database are rated as weak. Based on the field audit findings there appear to be delays in entering updated li information (e.g. SON lights in the database when LEDs were present on the stre and some issues with information accuracy (e.g. different LED lights recorded in database to in the field). The update process will not necessarily ensure that the correct change date is recorded where an existing light is changed.			
	The audit risk rating is high based on the potential kWh variances identified during the field audit. A small amount of database information was found to be incomplete or inaccurate.			
Actions to	aken to resolve the issue	Completion date	Remedial action status	
Contact will work with HCC to update their database to ensure accuracy of model/wattage and correct ICP number		Ongoing	Identified	
Contact will work with the customer to ensure that they are setup to deliver their data for any given time, as required by the EA				
Contact will work with HCC to ensure that their process for New Connections reflects actual usage.				
Preventative actions taken to ensure no further issues will occur		Completion date		
Contact will complete quarterly database checks to ensure the accuracy of HCC's database		Ongoing		

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2 With: Clause 15.2 and	The database is not confirmed as accurate with a 95% level of confidence as recorded in section 3.1 .			
15.37B(c)	23 items of load do not have model or wattage information recorded.			
	14 items of load have inaccurate wattages recorded.			
	47 items of load do not have ICP numbers recorded in the database.			
	Six items of load had incorrect ICP numbers recorded in the database and were corrected during the audit. The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Livening dates are not recorded for new connections, and change dates may not reflect the date the change is made.			
	Potential impact: High			
From: 01-Oct-19	Actual impact: Unknown			
To: 31-Oct-19	Audit history: Once			
	Controls: Weak			
	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls over the database are rated	d as weak.		
	Based on the field audit findings there appear to be delays in entering updated light information (e.g. SON lights in the database when LEDs were present on the street), and some issues with information accuracy (e.g. different LED lights recorded in the database to in the field). The update process will not necessarily ensure that the correct change date is recorded where an existing light is changed.			
	The audit risk rating is high based on kWh variances discussed in section 3.1 .			
Actions to	aken to resolve the issue	Completion date	Remedial action status	
Contact will work with HCC to update their database to ensure accuracy of model/wattage and correct ICP number		Ongoing	Identified	
Contact will work with the customer to ensure that they are setup to deliver their data for any given time, as required by the EA				
Contact will work with HCC to ensure that their process for New Connections reflects actual usage.				
Preventative actions taken to ensure no further issues will occur		Completion date		
Contact will complete quarterly database checks to ensure the accuracy of HCC's database		Ongoing		