

Compliance plan for Kawerau DC DUML – 2019

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3 From: 30-Jun-18 To: 16-Oct-19	Historic registry figure used for submission. RAMM database is not accurate. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak because the RAMM database is not used for reconciliation and there has been no change since the last audit. The impact is assessed to be high due to the registry figure being used, and the RAMM database accuracy being poor.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has already engaged with KDC to receive the database information to enable submission/billing to be based off KDC database information. Due to current submission process being non-compliant Genesis has changed to the database as @ September 2019 to meet this requirement. Genesis will update the registry daily kWh figure based on the monthly reporting provided by KDC with any exception defaulted or corrected, as this figure is used in their billing process.	01/09/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Database information has been requested to be delivered monthly.	01/09/2019	

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 Clause 11(2)(a) & (aa) of Schedule 15.3 From: 01-Jun-17 To: 16-Oct-19	ICP is not recorded in the database. Potential impact: None Actual impact: None Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the RAMM database does not hold the ICP. The impact is assessed to be low as there is only one ICP associated with this database.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has already requested the ICP 1000023043BP177 be updated in RAMM against each asset.	01/11/2019	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis reviews monthly data that will be provided by the council	01/09/2019	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 Clause 11(2)(b) of Schedule 15.3 From: 01-Jun-17 To: 16-Oct-19	27 items of load with insufficient location details. 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 the location is recorded for all but 27 items of load. The impact is assessed to be low as there are only 27 items of load with insufficient location details.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has already requested the locational details be updated in RAMM for each asset.	31/03/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis reviews monthly data that will be provided by the council	01/09/2019	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 Clause 11(2)(c)&(d) of Schedule 15.3 From: 01-Jun-17 To: 16-Oct-19	29 items of load with no lamp descriptions, lamp wattage and ballast detailed 183 items of load with no lamp wattage or ballast wattage recorded Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak the data quality indicates a lack of quality control to check the data being loaded. The impact is assessed to be medium as overall volume of load is small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has already requested the field audit information be updated in RAMM. Genesis defaults any missing lamp information to 150w HPS.		31/03/2020	
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis reviews monthly data that will be provided by the council, Genesis makes any corrections prior to submission/billing.		01/09/2019	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 16-Oct-19	41 lights not included in the database extract. Potential impact: Medium Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak the data quality indicates a lack of quality control to check the data being inputted. The impact is rated as medium as the actual impact is unknown as the registry figure is being used for reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has already requested the field audit information be updated in RAMM.		31/03/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis reviews monthly data that will be provided by the council, Genesis makes any corrections prior to submission/billing.		01/09/2019	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 16-Oct-19	In absolute terms the installed capacity is estimated to be 13.0 kW higher than the database indicates. Lamp wattage is recorded as ballast wattage. 29 items of load with no lamp descriptions, lamp wattage and ballast detailed 183 items of load with no lamp wattage or ballast wattage recorded 27 items of load did not have a street number or GPS coordinates Festive lighting is connected but the volume is not recorded. Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak the data quality indicates a lack of quality control to check the data being inputted. The impact is assessed to be high, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has already requested the field audit information be updated in RAMM. Genesis defaults any missing lamp information to 150w HPS.	31/03/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis reviews monthly data that will be provided by the council, Genesis makes any corrections prior to submission/billing.	01/09/2019	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: 01-Jun-17 To: 16-Oct-19	Historic registry figure used for submission. RAMM database is not accurate Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak because the RAMM database is not used for reconciliation and there has been no change since the last audit. The impact is assessed to be high due to the registry figure being used, and the RAMM database accuracy being poor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Ref 3.1 Wattage survey > than database wattage by 50.2% - Genesis believes that their use of historical registry information and an update based off KDC RAMM extraction with exceptions, has meant that Genesis Energy's settlements and billing has been more in line with actual field wattages than the database was prior. The use of this information was more accurate than the dataset for historical periods and moving forward this information can only get more accurate with the updates that KDC will be making.		31/03/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis reviews monthly data that will be provided by the council, Genesis makes any corrections prior to submission/billing.		01/09/2019	