Compliance plan for CODC DUML – 2019

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1 With: Clause 11(1) of	A discrepancy between the submission volume and the database resulting in an estimated annual under submission of 7,176 kWh.			
Schedule 15.3	Database is not confirmed as accurate with a 95% level of confidence.			
	25 LED lights with the incorrect wattage applied resulting in a very minor over submission of an estimated 30 kWh per annum.			
	Over submission of an estimated 25,236 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.			
	The data used for submission does not track changes at a daily basis and is provided as a snapshot.			
	Potential impact: Medium			
	Actual impact: Medium			
	Audit history: Once			
From: 17-Oct-18	Controls: None			
To: 31-Oct-19	Breach risk rating: 8			
Audit risk rating	Rationale for audit risk rating			
Medium	The controls are rated as none as there is no process in place to submit the correct consumption volumes for the hard-wired dimming which represent 83% of the lights in the CODC area.			
	The impact is assessed to be medium, based on the kWh differences described above.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis had not been informed that the LED assets install had hard wired dimming preprogramed. CODC had not advised as they were happy to absorb the extra costs associated. Genesis has advised that this is a compliance issue and discussions were held as to how we could proceed to meet compliance.		unknown	Investigating	
Preventative actions taken to ensure no further issue will occur		Completion date		
Genesis can only monitor the information held within the database. Genesis are reliant on the customer to divulge any relative information pertaining to asset variations.				

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	37 items of load with no lamp description recorded.		
With: Clause 11(2)(c) of Schedule 15.3	Four items of load with no ballast value recorded resulting in a very minor amount of under submission.		
	Potential impact: Low		
From: 17-Oct-18	Actual impact: Low		
To: 31-Oct-19	Audit history: None		
	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate because they ensure most information is accurate.		
	The impact is assessed to be low due to the small number of lights affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will work with the council to correct the ballast exceptions found in the database		01/03/2020	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to revise the information being provided by the council, with the expectation the council makes the necessary corrections		01/03/2020	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	Three additional lights found in the field.		
With: Clause 11(2A) of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: Once		
From: 17-Sep-18	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 ensure most information is accurate. The impact is assessed to be low due to the small number of additional lights found in the field in relation to the overall count of the items of load.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will work with the council to verify the field findings and clear the exceptions found in the database.		01/03/2020	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to revise the information being provided by the council, with the expectation the council makes the necessary corrections		01/03/2020	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	Database is not confirmed as accurate with a 95% level of confidence.		
With: Clause 15.2 and 15.37B(b)	One 70W HPS lamp with no ballast applied.		
	25 LED lights with the incorrect wattage applied resulting in a very minor over submission of an estimated 30 kWh per annum.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Once		
From: 17-Oct-18	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 field audit indicated the controls are robust but there is room for errors to occur.		
	The impact is assessed to be low due to the small number of errors in the field and the small number of LED lights with the incorrect wattage applied.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will work with the council to verify and clear the exceptions found in the database.		01/03/2020	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Continue to revise the information being provided by the council, with the expectation the council makes the necessary corrections		01/03/2020	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 Clause 15.2 and	A discrepancy between the submission volume and the database resulting in an estimated annual under submission of 7,176 kWh.		
15.37B(c)	Database is not confirmed as accurate with a 95% level of confidence.		
	25 LED lights with the incorrect wattage applied resulting in a very minor over submission of an estimated 30 kWh per annum.		
	Over submission of an estimated 25,236 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.		
	The data used for submission does not track changes at a daily basis and is provided as a snapshot.		
	Potential impact: Medium		
	Actual impact: Medium		
	Audit history: Once		
From: 17-Oct-18	Controls: None		
To: 31-Oct-19	Breach risk rating: 8		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as none as there is no process in place to submit the correct consumption volumes for the hard-wired dimming which represent 83% of the lights in the CODC area.		
	The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis had not been informed that the LED assets install had hard wired dimming preprogramed. CODC had not advised as they were happy to absorb the extra costs associated. Genesis has advised that this is a compliance issue and discussions were held as to how we could proceed to meet compliance.		unknown	Investigating
Preventative actions to	aken to ensure no further issue will occur	Completion date	
Genesis can only monitor the information held within the database. Genesis are reliant on the customer to divulge any relative information pertaining to asset variations.			