

## Compliance plan for NZTA Otago DUML – 2019

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 31-Dec-18</p> <p>To: 03-Sep-19</p>	<p>In absolute terms, total annual consumption is estimated to be 25,200 kWh lower than the DUML database indicates, as recorded in Section 3.1.</p> <p>Incorrect ballasts applied resulting in an estimated under submission of 807 kWh per an annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls are rated as moderate as they are will mitigate risk and remove errors most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Will instruct Aurora Energy to check and make the changes to correct the discrepancies found in the audit.</p> <p>There are no immediate plans to update the process of providing a “snapshot” report. However, we have confirmed that there is no active LED replacement programme in place, and therefore changes will be limited to largely maintenance activity and the impact of relying on a snapshot report is expected to be minor overall.</p> <p>We have an internal process whereby light types are compared to the EA standard table and this helps us identify anomalies in things like light ballast. Unknown types are questioned with the contractor/customer, and where necessary are raised with the EA if they require inclusion/update in the standards table.</p>		24 <sup>th</sup> April 20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We continue to work with our customer and their contractors to remind them of their responsibilities when maintaining or changing items of load connected to DUML. This includes the timeliness and accuracy of notifications.</p>		24 <sup>th</sup> April 20	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) and (d) of Schedule 15.3 From: 31-Dec-18 To: 03-Sep-19	1 additional item of load found in the field sample. Potential impact: High Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate because the update process from contractors to Aurora has some room for improvement. The impact is assessed to be low because only one example was found.		
Actions taken to resolve the issue		Completion date	Remedial action status
Will instruct Aurora Energy to check and make the changes		1 May 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once these changes are made and updated then this should not reoccur		1 May 2020	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Dec-18</p> <p>To: 04-Sep-19</p>	<p>The database is inaccurate. In absolute terms, total annual consumption is estimated to be 25,200 kWh lower than the DUML database indicates.</p> <p>22 items of load with incomplete lamp descriptions.</p> <p>Incorrect ballasts applied resulting in an estimated under submission of 807 kWh per an annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as moderate as they are will mitigate risk and remove errors most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Will instruct Aurora Energy to check and make the changes to correct the discrepancies found in the audit.</p> <p>There are no immediate plans to update the process of providing a “snapshot” report. However, we have confirmed that there is no active LED replacement programme in place, and therefore changes will be limited to largely maintenance activity and the impact of relying on a snapshot report is expected to be minor overall.</p> <p>We have an internal process whereby light types are compared to the EA standard table and this helps us identify anomalies in things like light ballast. Unknown types are questioned with the contractor/customer, and where necessary are raised with the EA if they require inclusion/update in the standards table.</p>	1 May 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We continue to work with our customer and their contractors to remind them of their responsibilities when maintaining or changing items of load connected to DUML. This includes the timeliness and accuracy of notifications.	1 May 2020	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 31-Dec-18</p> <p>To: 03-Sep-19</p>	<p>In absolute terms, total annual consumption is estimated to be 25,200 kWh lower than the DUML database indicates, as recorded in Section 3.1.</p> <p>Incorrect ballasts applied resulting in an estimated under submission of 807 kWh per an annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls are rated as moderate as they are will mitigate risk and remove errors most of the time.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Will instruct Aurora Energy to check and make the changes to correct the discrepancies found in the audit.</p> <p>There are no immediate plans to update the process of providing a “snapshot” report. However, we have confirmed that there is no active LED replacement programme in place, and therefore changes will be limited to largely maintenance activity and the impact of relying on a snapshot report is expected to be minor overall.</p> <p>We have an internal process whereby light types are compared to the EA standard table and this helps us identify anomalies in things like light ballast. Unknown types are questioned with the contractor/customer, and where necessary are raised with the EA if they require inclusion/update in the standards table.</p>		1 May 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We continue to work with our customer and their contractors to remind them of their responsibilities when maintaining or changing items of load connected to DUML. This includes the timeliness and accuracy of notifications.</p>		1 June 2020	