

## Compliance plan for Horowhenua District Council – 2019

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Oct-19 To: 14-Oct-19</p>	<p>The database is not confirmed as accurate with a 95% level of confidence.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates are recorded as the vesting date for new connections, and change dates may not reflect the date of the change if they are not processed in RAMM at the time that the change occurs.</p> <p>39 items of load had invalid gear wattages for their lamp model description, resulting in an estimated under submission of 179 kWh p.a. The incorrect records were updated during the audit.</p> <p>91 items of load do not have ICP numbers recorded, including:</p> <ul style="list-style-type: none"> <li>• one 22W LED council parks light resulting in estimated under submission of 94 kWh p.a.;</li> <li>• 87 private lights resulting in estimated under submission of 31,823 kWh p.a.; and</li> <li>• three festive lights, which have no impact on submission because volumes are recorded against ICP 0016099004EL9CA when the lights are connected.</li> </ul> <p>Levin Mall lights are submitted against ICP 0016099004EL9CA based on database information, and also ICP 0016097099EL1B6 based on registry information, resulting in estimated over submission of 28,652 kWh p.a.</p> <p>Potential impact: Medium Actual impact: Unknown Audit history: Twice Controls: Weak Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls over the database are rated as weak because database accuracy falls outside the <math>\pm 5\%</math> accuracy threshold, and issues were identified across a range database information.</p> <p>The impact is assessed to be medium based on the kWh differences described above. The incorrect gear wattages have already been corrected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

Genesis will work with HDC and SmartPower to correct any invalid asset information	01/03/2020	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Confirm asset ICP identifier and have RAMM updated accordingly	01/03/2020	

<b>ICP identifier and items of load</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 01-Apr-18</p> <p>To: 14-Oct-19</p>	<p>One 22W LED does not have an ICP number recorded against it, resulting in estimated under submission of 94 kWh p.a.</p> <p>Three festive lights do not have an ICP number recorded against them. There is no impact on submission because the load is reported against the correct ICP number when connected.</p> <p>87 private lights do not have an ICP number recorded against them, resulting in estimated under submission of 31,823 kWh p.a.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Medium</b>	<p>The controls are rated as moderate because a small number of items of load do not have valid ICP numbers recorded.</p> <p>The impact is assessed to be medium based on the kWh differences described above.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Genesis will work with HDC and SmartPower to correct any invalid asset information	01/03/2020	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Confirm asset ICP identifier and have RAMM updated accordingly	01/03/2020	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Oct-19</p> <p>To: 14-Oct-19</p>	<p>The database is not confirmed as accurate with a 95% level of confidence.</p> <p>Livening dates are recorded as the vesting date for new connections, and change dates may not reflect the date of the change if they are not processed in RAMM at the time that the change occurs.</p> <p>39 items of load had invalid gear wattages for their lamp model description, resulting in estimated under submission of 179 kWh p.a. The incorrect records were updated during the audit.</p> <p>Four items of load have some inaccurate address information.</p> <p>91 items of load do not have ICP numbers recorded, including:</p> <ul style="list-style-type: none"> <li>• one 22W LED council parks light resulting in estimated under submission of 94 kWh p.a.;</li> <li>• 87 private lights resulting in estimated under submission of 31,823 kWh p.a.; and</li> <li>• three festive lights, which have no impact on submission because volumes are recorded against ICP 0016099004EL9CA when the lights are connected.</li> </ul> <p>Levin Mall lights are submitted against ICP 0016099004EL9CA based on database information, and also ICP 0016097099EL1B6 based on registry information, resulting in estimated over submission of 28,652 kWh p.a.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls over the database are rated as weak because database accuracy falls outside the <math>\pm 5\%</math> accuracy threshold, and issues were identified across a range database information.</p> <p>The impact is assessed to be medium based on the kWh differences described above. The incorrect gear wattages have already been corrected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will be assessing the information provided for the "Council lighting assets", Private lights are the responsibility of the Distributor, who is responsible for assigning a distributor only ICP and assigning the correct shared ICPs (SUMML). This is not DUMML and is not a trader or Council responsibility. The Distributor will be notified of these lights.	01/03/2020	Investigating



Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis Will work with HDC and SmartPower to correct any invalid asset information. Private lights are not the responsibility of the Council. Genesis has requested the Distributor to review these assets.</p> <p>Tracking of changes will be discussed with the council.</p>	01/03/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Confirm asset ICP identifier and have RAMM updated accordingly. Review asset information as required.</p>	01/03/2020	