Compliance plan for MPDC DUML – 2019

| Deriving submission information | | | |
|---|--|-----------------|------------------------|
| Non-compliance | Des | scription | |
| Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 | NZTA rural lights recorded against the MPDC ICP not reconciled resulting in an estimated annual under submission of 96,093kWh. Festive lights included in the September 2019 monthly wattage report resulting | | |
| | in an estimated over submission of 414kWh. The data used for submission does not track changes at a daily basis and is provided as a snapshot. | | |
| | Potential impact: High | | |
| | Actual impact: High | | |
| From: 01-Jul-19 | Audit history: Three times previously | | |
| To: 31-Oct-19 | Controls: Moderate | | |
| | Breach risk rating: 6 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| High | The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time. | | |
| | The impact is assessed to be high, based on the under submission detailed above. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We will attempt to confirm who is responsible for the NZTA rural lights recorded in the council database and provide information to them regarding these lights. In our view this should be the Trader has the contractual relationship with NZTA for the lights in the district. | | 28 Feb 2020 | Identified |
| We will review all submissions from when these lights switched in to confirm whether the festive lights have been included and revise submissions where needed. | | 28 Feb 2020 | |
| Preventative actions taken to ensure no further issue will occur | | Completion date | |
| We will clarify with the council their process for creating the monthly wattage report and make changes where required to mitigate the risk of future issues. | | 30 April 2020 | |

| Description and capacity of load | | | |
|--|---|-----------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 2.4 | One item of load with no lamp mode, make, wattage or ballast. | | |
| With: Clause 11(2A) of | Potential impact: Low | | |
| Schedule 15.3 | Actual impact: Low | | |
| | Audit history: Once previously | | |
| From: 01-Jun-18 | Controls: Strong | | |
| To: 31-Oct-19 | Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as strong as checks are in place to accurately record these details. The impact is assessed to be low as only one item of load is affected. | | |
| | | | Remedial action status |
| Actions taken to resolve the issue | | date | Remediai action status |
| We will raise this with the council for resolution. | | 28 Feb 2020 | Identified |
| Preventative actions taken to ensure no further issue will occur | | Completion date | |
| | | | |

| 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 previously | | |
| From: 01-Jun-18 | Controls: Strong | | |
| To: 31-Oct-19 | Breach risk rating: 1 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as strong as the processes in place to manage the database are robust. | | |
| | 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 |
| Discrepancies will be passed on to the council for review and resolution | | 28 Feb 2020 | Identified |
| Preventative actions taken to ensure no further issue will occur | | Completion date | |
| | | | |

| Database accuracy | | | |
|--|---|-----------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 3.1 | Six items of load with missing or incorrect wattages/ballasts recorded. | | |
| With: Clause 15.2 and | 2 and Potential impact: Low | | |
| 15.37B(b) | Actual impact: Low | | |
| | Audit history: Once | | |
| From: 01-Jun-18 | Controls: Moderate | | |
| To: 31-Oct-19 | Breach risk rating: 4 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time. | | |
| | The impact is assessed to be low due to the small number of incorrect wattages/ballasts found. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We will pass on details of the missing and incorrect wattages for correction. | | 28 Feb 2020 | Identified |
| We will also confirm why the ballasts recorded in RAMM are not being used but are being applied manually as these appear to be populate and (aside from the 5 mentioned in this section) largely accurate. | | 28 Feb 2020 | |
| Preventative actions taken to ensure no further issue will occur | | Completion date | |
| | | | |

| Volume information accuracy | | | |
|---|---|-----------------|------------------------|
| Non-compliance | Description | | |
| Audit Ref: 3.2 With: Clause 15.2 and | NZTA rural lights recorded against the MPDC ICP not reconciled resulting in an estimated annual under submission of 96,093kWh. | | |
| 15.37B(c) | Festive lights included in the September 2019 monthly wattage report resulting in an estimated over submission of 414kWh. | | |
| | The data used for submission does not track changes at a daily basis and is provided as a snapshot. | | |
| From: 01-Jul-19 To: 31-Oct-19 | Potential impact: High | | |
| | Actual impact: High | | |
| | Audit history: Three times previously | | |
| | Controls: Moderate | | |
| | Breach risk rating: 6 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| High | The controls are rated as moderate, because they are sufficient to ensure that changes to the database are correctly recorded most of the time. | | |
| | The impact is assessed to be high, based on the under submission detailed above. | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status |
| We will attempt to confirm who is responsible for the NZTA rural lights recorded in the council database and provide information to them regarding these lights. In our view this should be the Trader has the contractual relationship with NZTA for the lights in the district. | | 28 Feb 2020 | Identified |
| We will review all submissions from when these lights switched in to confirm whether the festive lights have been | | 28 Feb 2020 | |

Completion date

30 April 2020

included and revise submissions where needed.

mitigate the risk of future issues.

Preventative actions taken to ensure no further issue will

occur

We will clarify with the council their process for creating the

monthly wattage report and make changes where required to