

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

WESTERN BAY OF PLENTY DISTRICT
COUNCIL
AND GENESIS ENERGY LIMITED

Prepared by: Steve Woods

Date audit commenced: 12 November 2019

Date audit report completed: 20 January 2020

Audit report due date: 26-Dec-19

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EXECUTIVE SUMMARY

This audit of the Western Bay of Plenty District Council (**WBOP DC**) DUML database and processes was conducted at the request of Genesis Energy Limited (**Genesis**), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The asset data capture and database population is also conducted by Westlink. The field work is carried out by Horizon.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was updated in October 2018 based on the details from the September report provided by Westlink, but there have not been any further updates.

In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.

The audit found four non-compliances. The future risk rating of 12 indicates that the next audit be completed in 12 months. This seems a reasonable timeframe. The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	<p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 2,450 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p> <p>In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.</p>	Weak	Low	3	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	Four lights not recorded in the database.	Weak	Low	3	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	New lights are not added to the database for reconciliation in the	Weak	Low	3	Identified

			month they are electrically connected. In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.				
Volume information accuracy	3.2	15.2 and 15.37B(c)	Monthly database reporting not used for submission resulting in a potential under submission of an estimated 2,450 kWh per annum. New lights not added to the RAMM database within the month of electrical connection. In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.	Weak	Low	3	Identified
Future Risk Rating						12	

Future risk rating	0	1-4	5-8	9-15	16-18	19+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Description	Recommendation
Tracking of load change	2.6	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	Investigating

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

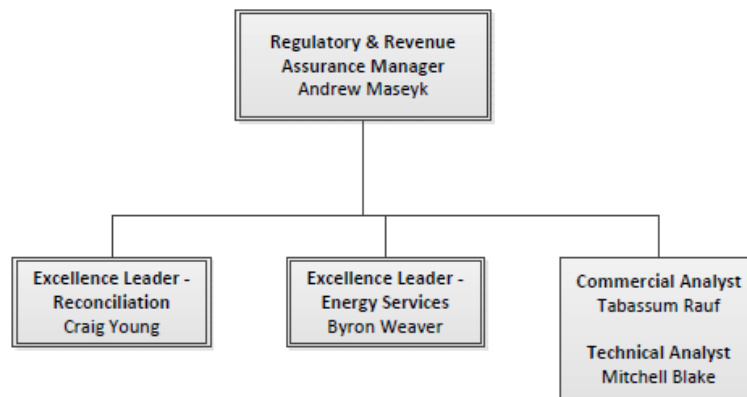
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Genesis provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditor:

Steve Woods

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Craig Young	Excellence Leader - Reconciliation	Genesis Energy
Grace Hawken	Technical Specialist - Reconciliation Team	Genesis Energy
Phillip Barnes	Maintenance Manager	Westlink BOP

1.4. Hardware and Software

The SQL database used for the management of DUML is remotely hosted by RAMM Software Ltd. The database is commonly known as “RAMM” which stands for “Roading Asset and Maintenance Management”.

Westlink confirmed that the database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

1.6. ICP Data

ICP Number	Description	Profile	Number of items of load	Database wattage (watts)
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	UNM	535	47,010

1.7. Authorisation Received

All information was provided directly by Genesis or Westlink.

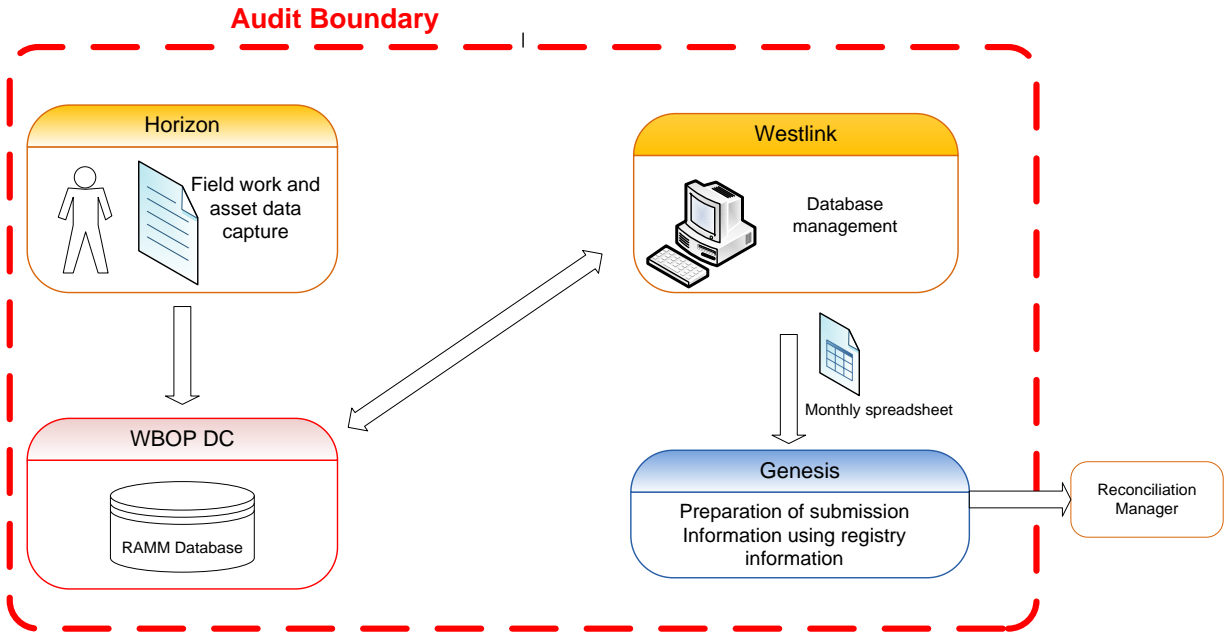
1.8. Scope of Audit

This audit of the Western Bay of Plenty District Council (**WBOP DC**) DUML database and processes was conducted at the request of Genesis Limited (**Genesis**), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. A monthly report detailing the number of lights and lamp wattage is provided each month by Westlink, but this is not used for reconciliation.

The database is remotely hosted by RAMM Software Ltd. The field work is carried out by Horizon. The asset data capture and database population are conducted by Westlink. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information. The diagram below shows the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 141 items of load.

1.9. Summary of previous audit

The previous audit was completed in March 2019 by Rebecca Elliot of Veritek Limited. Four non-compliances were identified, and one recommendation was made. The statuses of the non-compliances and recommendation are described below.

Table of Non-Compliance

Subject	Section	Clause	Non-Compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	Monthly database reporting not used for submission resulting in a potential under submission of an estimated 1,695.32 kWh per annum. New lights not added to the RAMM database within the month of electrical connection.	Still existing
All load recorded in database	2.5	11(2A) of Schedule 15.3	Three new lights not recorded in the database.	Still existing

Subject	Section	Clause	Non-Compliance	Status
Database accuracy	3.1	15.2 and 15.37B(b)	New lights are not added to the database for reconciliation in the month they are electrically connected.	Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	<p>Incorrect daily kWh figure recorded in the registry from 1/10/18-28/2/19 resulting in 4,250.65 kWh of under submission.</p> <p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 1,695.32 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p>	Still existing

Recommendations

Subject	Section	Description	Recommendation
Tracking of load change	2.6	Liaise with Powerco to determine the most effective process to ensure the volumes associated with new subdivision streetlights are reconciled.	Still existing

1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)
2. within three months of submission to the reconciliation manager (for new DUML)
3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.

Audit observation

Genesis have requested Veritek to undertake this streetlight audit.

Audit commentary

This audit report confirms that the requirement to conduct an audit has been met for this database within the required timeframe.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- DUML database is up to date
- methodology for deriving submission information complies with Schedule 15.5.

Audit observation

The process for calculation of consumption was examined and the application of profiles was checked. The database was checked for accuracy.

Audit commentary

Genesis reconciles this DUML load using the UML profile.

Genesis receive a monthly wattage report but uses the trader unmetered load fields on the registry. The trader details were updated in October 2018 using the details from the September report provided by Westlink. The daily kWh value was found to be incorrect and was corrected during the course of this audit. Submissions between October 2018 to February 2019 will be corrected through the wash up process. This is recorded as non-compliance in **section 3.2**.

A monthly report is sent each month but is not being used for reconciliation. This is recorded as non-compliance.

I compared the submission volumes between the load recorded in the database extract and the registry figure for the month of February 2019. There is a minor difference from the wattage recorded in the database, and the registry figure.

ICP Number	Description	October 2019 kWh submission	RAMM estimated February 2019 kWh submission	Estimated kWh February 2019 difference
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	17,133.93	17,341.99	-208.06

This equates to a potential annual under submission of 2,450 kWh. This will be due to the monthly wattage report not being used for reconciliation.

New lights are not added to the database in the month of these being electrically connected. Three new lights identified in the previous audit have not yet been added to the database. This is discussed further in **section 2.5**. This is recorded as non-compliance below.

In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3 From: 01-Apr-19 To: 27-Nov-19	<p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 2,450 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p> <p>In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as the RAMM database is not used for reconciliation and new lights are not added within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Introduce the monthly reporting as the source for settlements.		01/03/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Review the monthly report for accuracy		01/03/2020	

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUML database must contain:

- *each ICP identifier for which the retailer is responsible for the DUML*
- *the items of load associated with the ICP identifier.*

Audit observation

The database was checked to confirm the correct ICP was recorded against each item of load.

Audit commentary

All items of load have an ICP recorded against them.

Audit outcome

Compliant

2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

The DUMML database must contain the location of each DUMML item.

Audit observation

The databases were checked to confirm the location is recorded for all items of load.

Audit commentary

The database contains fields for the street address and GPS coordinates, and all were populated.

Audit outcome

Compliant

2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

Code reference

Clause 11(2)(c) and (d) of Schedule 15.3

Code related audit information

The DUMML database must contain:

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

Audit observation

The database was checked to confirm it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

Audit commentary

The database contains the manufacturers rated wattage and the ballast wattage. The extract provided has fields for lamp and gear make and model, and all were populated. The accuracy of the lamp description, capacity and ballasts recorded is discussed in **section 3.1**.

Audit outcome

Compliant

2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

The retailer must ensure that each item of DUMML for which it is responsible is recorded in this database.

Audit observation

The field audit was undertaken of a statistical sample of 141 items of load.

Audit commentary

The field audit findings are shown in the table below:

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
ANZAC BAY RESERVE ROAD	4	3	-1	-	1x 150W HPS not found in the field
BEACH ROAD (WAIHI BEACH)	22	22	-	1	1 x 70W HPS recorded as 150W HPS
MARINE AVENUE	2	3	+1	-	1 x additional 70W HPS
OCEAN BREEZE DRIVE	13	13	-	5	5 x LED recorded as 70W HPS
OCEAN VIEW ROAD	10	10	-	1	1 x 150W HPS recorded as 70W HPS

This clause relates to lights found in the field that are not recorded in the database. One additional light was identified in the field audit. The accuracy of the database is discussed in **section 3.1**.

I rechecked the three new lights identified in the last audit that had not been added to the database and found they were all still to be added to the database:

Address	Database Count	Field Count	Count differences	Wattage differences	Comments
New					
REEL ROAD EXTENTION	0	3	3		Lights not recorded in RAMM

These lights are likely to have been vested to Council by now, but Westlink have yet to receive any information from the council to get these lights added to the database nine months after they were identified in the last audit. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Apr-19 To: 27-Nov-19	Four lights not recorded in the database. Potential impact: Medium Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as new lights are not added to the database as required by the code. The impact is low as the volume of lights identified is small.		
Actions taken to resolve the issue		Completion date	Remedial action status

Genesis Continue to work with WBoP, however the process to vest assets is a matter of discussion as to whether this will change or not. Genesis will request WBoP to review and make the necessary correction to update their database.		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis needs to review the data being provided for accuracy.	01/03/2020	

2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

Audit observation

The database was checked for audit trails.

Audit commentary

The database contains a complete audit trail of all additions and changes.

Audit outcome

Compliant

2.7. Audit trail (Clause 11(4) of Schedule 15.3)

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

The DUML database must incorporate an audit trail of all additions and changes that identify:

- *the before and after values for changes*
- *the date and time of the change or addition*
- *the person who made the addition or change to the database.*

Audit observation

The database was checked for audit trails.

Audit commentary

The database has a complete audit trail.

Audit outcome

Compliant

3. ACCURACY OF DUML DATABASE

3.1. Database accuracy (Clause 15.2 and 15.37B(b))

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

Audit observation

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

Plan Item	Comments
Area of interest	Western BOP DC Street Lights in the Waihi area
Strata	The databases contain 535 items of load in the Western BOP DC area. The processes for the management of all WBOPDC items of load is the same and therefore I split the data into three relatively even sized data sets using street name to allocate lights between the strata: <ul style="list-style-type: none"> • Street name A-G • Street name H-R • Street name S-W
Area units	I created a pivot table of the roads in each database and used a random number generator in each spreadsheet to select a total of 28 sub-units.
Total items of load	141 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority.

Audit commentary

A field audit was conducted of a statistical sample of 141 items of load. The “database auditing tool” was used to analyse the results, which are shown in the table below.

Result	Percentage	Comments
The point estimate of R	97.6	Wattage from survey is lower than the database wattage by 5.0%
R _L	91.3	With a 95% level of confidence it can be concluded that the error could be between -8.7% and +1.4%
R _H	101.4	

These results were categorised in accordance with the “Distributed Unmetered Load Statistical Sampling Audit Guideline”, effective from 01/02/19 and the table below shows that Scenario C (detailed below) applies.

The conclusion from Scenario C is that the variability of the sample results across the strata means that the true wattage (installed in the field) could be between 8.7% lower and 1.4% higher than the wattage recorded in the DUML database. Non-compliance is recorded because the potential error is greater than 5.0%.

In absolute terms the installed capacity is estimated to be 1.0 kW lower than the database indicates.

There is a 95% level of confidence that the installed capacity is between 4.0 kW lower than the database and 1.0 kW higher than the database.

In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.

There is a 95% level of confidence that the annual consumption is between 17,500 kWh p.a. lower to 2,900 kWh p.a. higher than the database indicates.

Scenario	Description
<p>A - Good accuracy, good precision</p>	<p>This scenario applies if:</p> <ul style="list-style-type: none"> (a) R_H is less than 1.05; and (b) R_L is greater than 0.95 <p>The conclusion from this scenario is that:</p> <ul style="list-style-type: none"> (a) the best available estimate indicates that the database is accurate within +/- 5 %; and (b) this is the best outcome.
<p>B - Poor accuracy, demonstrated with statistical significance</p>	<p>This scenario applies if:</p> <ul style="list-style-type: none"> (a) the point estimate of R is less than 0.95 or greater than 1.05 (b) as a result, either R_L is less than 0.95 or R_H is greater than 1.05. <p>There is evidence to support this finding. In statistical terms, the inaccuracy is statistically significant at the 95% level</p>
<p>C - Poor precision</p>	<p>This scenario applies if:</p> <ul style="list-style-type: none"> (a) the point estimate of R is between 0.95 and 1.05 (b) R_L is less than 0.95 and/or R_H is greater than 1.05 <p>The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within +/- 5 %</p>

The database was checked against the published standardised wattage table and confirmed that ballasts applied, and lamp descriptions were correct.

As detailed in **section 2.5**, three new lights found missing from the database in the last audit have yet to be added. This equates to an estimated 449 kWh of under submission annually.

NZTA Lighting

NZTA lighting is not included in this audit.

ICP accuracy

No ICP errors were identified.

Location accuracy

The database contains fields for the street address and GPS coordinates, and all were populated.

Change management process findings

The process to add new streetlights was examined and it remains unchanged from the last audit. WBOP DC approves all new developments and the consent is provided once they are satisfied that the development will meet the required standards. Detailed “as-builts” are required to be provided by the developer and a walk over by council staff of the development is undertaken before the 224 certificate is issued. Once this is issued the “as-builts” should be sent to Westlink to upload to RAMM. This process is slow, and it can take some months before this information reaches Westlink. This was evident in this audit as I rechecked the new lights identified in the last audit and these have not yet been added to RAMM nine months later. It is likely that these roads have been vested to council but Westlink have not received any information to progress this. When new lights are added to the database Westlink’s contract does not require them to be added until the 20th of the month following them being advised. This will result in no submission in a further month from the new lights being added if the RAMM database extract was used for submission.

Horizon carries out the field maintenance for Westlink on behalf of WBOP DC and they update RAMM directly. Westlink have robust controls in their contract with Horizon and this ensures that field maintenance is captured in a timely and accurate manner. Outage patrols are in place with the whole network being checked each month. Additional to this Westlink undertake a 20% validation of all assets they are responsible for on an annual basis.

WBOP DC will be undertaking an LED light update, this is still in the planning phase and not expected to be started until the next financial year at the earliest. There are no plans to use a dimming or central management system.

There are no festive lights connected to the unmetered streetlight circuits and there are no private lights known of or identified as part of the field audit undertaken.

Audit outcome

Non-compliant

Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Apr-19 To: 27-Nov-19	New lights are not added to the database for reconciliation in the month they are electrically connected. In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating

Low	The controls are rated as weak as new lights are not added to RAMM within the month of being electrically connected. The impact is assessed to be low, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis Continue to work with WBoP, however the process to vest assets is a matter of discussion as to whether this will change or not. Genesis will request WBoP to review and make the necessary correction to update their database.			Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis needs to review the data being provided for accuracy.		01/03/2020	

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- volume information for the DUML is being calculated accurately
- profiles for DUML have been correctly applied.

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that the ICP has the correct profile and submission flag; and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Genesis receive a monthly wattage report but uses the trader unmetered load fields on the registry. The trader details were updated in October 2018 using the details from the September report provided by Westlink. The daily kWh value was found to be incorrect and was corrected during the course of this audit. Submissions between October 2018 to February 2019 will be corrected through the wash up process. This is recorded as non-compliance below.

The previous issue of the monthly report not including ballast was resolved in September 2018 and a monthly report is sent each month but is not being used for reconciliation. This is recorded as non-compliance.

I compared the submission volumes between the load recorded in the database extract and the registry figure for the month of February 2019. There is a minor difference from the wattage recorded in the database, and the registry figure.

ICP Number	Description	October 2019 kWh submission	RAMM estimated February 2019 kWh submission	Estimated kWh February 2019 difference
0000557892UNB4E	STREETLIGHTING, WAIHI BEACH, WESTERN BAY OF PLENTY	17,133.93	17,341.99	-208.06

This equates to a potential annual under submission of 2,450 kWh. This will be due to the monthly wattage report not being used for reconciliation.

New lights are not added to the database in the month of these being electrically connected. Three new lights identified in the previous audit have not yet been added to the database. This is discussed further in **section 2.5**. This is recorded as non-compliance below.

In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUMML database indicates.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: 01-Apr-19 To: 27-Nov-19	<p>Monthly database reporting not used for submission resulting in a potential under submission of an estimated 2,450 kWh per annum.</p> <p>New lights not added to the RAMM database within the month of electrical connection.</p> <p>In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUMML database indicates.</p> <p>Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as the RAMM database is not used for reconciliation and new lights are not added within the month of being electrically connected.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Introduce the monthly reporting as the source for settlements.		01/03/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Review the monthly report for accuracy		01/03/2020	

CONCLUSION

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information. A RAMM database is managed by Westlink on behalf of WBOP DC in relation to this load. The asset data capture and database population is also conducted by Westlink. The field work is carried out by Horizon.

Genesis use the daily kWh figure recorded in the registry to reconcile this load. The registry figure was updated in October 2018 based on the details from the September report provided by Westlink, but there have not been any further updates.

In absolute terms, total annual consumption is estimated to be 4,900 kWh lower than the DUML database indicates.

The audit found four non-compliances. The future risk rating of 12 indicates that the next audit be completed in 12 months. This seems a reasonable timeframe.

PARTICIPANT RESPONSE

Genesis will be correcting the settlement data source to utilise the information provided by Westlink.