

Compliance plan for NZTA Wairarapa for Genesis Energy Limited 2020

Title: Deriving Submission Information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 27-Feb-20 To: 27-Feb-20	Submissions are not calculated based on database information. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331). Potential impact: High Actual impact: Unknown Audit history: Twice Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate. The risk is medium based on the 5.256 kW or 22,488 kWh per annum difference between the database and registry information used for submission. The incorrect ICP numbers currently have no impact because the database information is not used for submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
The current assets are being investigated as ICP WR9A had switched to CTCT leaving some data with Genesis and on the wrong ICP. The corrections have been made however further issues have been identified where there maybe further duplication of load across 3 traders and 4 ICP's in this region, some pertaining to Masterton DC	01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis works with the data source administrator to rectify any issue raised in the audits.	01/04/2020	

Title: Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 27-Feb-20 To: 27-Feb-20	The available audit trails do not specify: <ol style="list-style-type: none"> 1) the user who made the data change, and 2) the date and time of the data change. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, because the user who made the change and the approximate date and time of the change can be determined from other information which is available. The impact is assessed to be low based on the nature and type of non-compliance, and because only one user is maintaining the database.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis finds the database manager is generally adequate to ensure changes are administered.	01/04/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will advise the database manager of the potential impact inaccuracies in change management.	01/04/2020	

Title: Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 27-Feb-20 To: 27-Feb-20	32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331). Potential impact: High Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. The ICP number missed being updated when the GXP was updated, creating a discrepancy. The impact is assessed to be low because the correct GXPs are recorded. There is no impact on submission because the database information is not used for submission.	

Actions taken to resolve the issue	Completion date	Remedial action status
The current assets are being investigated as ICP WR9A had switched to CTCT leaving some data with Genesis and on the wrong ICP. The corrections have been made however further issues have been identified where there may be further duplication of load across 3 traders and 4 ICP's in this region, some pertaining to Masterton DC	01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis works with the data source administrator to rectify any issue raised in the audits.	01/04/2020	

Title: Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 27-Feb-20 To: 27-Feb-20	Submissions are not calculated based on database information. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331). Potential impact: High Actual impact: Unknown Audit history: Twice Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate. The risk is medium based on the 5.256 kW or 22,488 kWh per annum difference between the database and registry information used for submission. The incorrect ICP numbers currently have no impact because the database information is not used for submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
The database adjustments have been made, however further investigation into the NZTA assets in this region is required as the assets are across multiple ICP's and multiple traders. This has just come to light when Genesis question NZTA why 1 ICP switched away and not the other.	01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will have the corrections made, and will update the registry monthly with the correct uml details for these assets.	01/04/2020	