

Compliance plan for Invercargill CC DUML – 2020

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Apr-19 To: 30-Sep-19	Database is not confirmed as accurate with a 95% level of confidence resulting in a minor potential under submission of 900kWh per annum as recorded in section 3.1 . Potential impact: Low Actual impact: Low Audit history: Multiple Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be low based on the database accuracy detailed in section 3.1 .	
Actions taken to resolve the issue	Completion date	Remedial action status
In the near future ICC will have completed :LED upgrading and will not expect many data records to change to minimise risks	April 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
In the near future ICC will have completed :LED upgrading and will not expect many data records to change to minimise risks	April 2020	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Oct-19 To: 30-Nov-19	Two items of load with insufficient details to locate them. Potential impact: None Actual impact: None Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as location details are captured using GPS co-ordinates to ensure items of are locatable, but this has been missed in two instances and not corrected since the last audit. The impact is assessed to be none as only two lights were affected but this is recorded as low as none is not an available option.	
Actions taken to resolve the issue	Completion date	Remedial action status
Minor information missing. All data has a road location and the missing information is minor and relates to Christmas decorate lighting which will now be better monitored and noted clearer in the DB.	Feb 2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Better descriptions as we are now aware of the specific information required for discrete assets	Feb 2020	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: To: 30-Nov-19	Nine additional lights were found in the field. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, as the processes to track changes have been strengthened since the last audit but some errors are still evident. The impact is assessed to be low based on kWh variances detailed in section 3.1 .	
Actions taken to resolve the issue	Completion date	Remedial action status
For Wilton Street, data existed in spreadsheet but under another ICP which was the actual error not that they were missing from RAMM.	March 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
More care in procedures for adding or amending data	March 2020	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-Oct-19 To: 30-Nov-19	Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 900 kWh higher than the DUML database indicates. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be low, based on the kWh difference described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
The festive lighting added to database to be compliant resulted in a risk score due to no exact location of lights. Data is now stable as LED do not need changes so risks to changes is now very low.	March 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to develop procedural checks	Ongoing	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Apr-19</p> <p>To: 30-Nov-19</p>	<p>Database is not confirmed as accurate with a 95% level of confidence resulting in a minor potential under submission of 900kWh per annum as recorded in section 3.1.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be low based on the database accuracy detailed in section 3.1. .</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Need more data input controls for dates in and out. This will need to be manual actions.	April 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Procedures updated.	April 2020	