Compliance plan for Selwyn DC – 2020

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1	The database contains some inaccurate data.			
With: Clause 11(1) of Schedule 15.3	•			
	9 lamps have incorrect total wattages, resulting in estimated over submission of 10W or 470 kWh p.a. based on 4,271 burn hours.			
	Submissions are calculated based on a snapshot at the end of the month. Potential impact: High			
	Actual impact: Unknown			
	Audit history: Three times			
From: unknown	Controls: Moderate			
To: 05-Feb-20	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
High	Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences. A small number of incorrect lamp wattages were identified.			
	The impact is assessed to be high, based on the kWh differences described a Orion intends to investigate and correct the differences identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Mercury will liaise with the customer to update the database to ensure accurate submission. We will review our internal processes to comply with the EA memo.		July 20	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20		
We will review our internal processes to comply with the EA memo.				

All load recorded in database				
Non-compliance	Description			
Audit Ref: 2.5	One item of load was missing from the database.			
With: Clause 11(2A) of	Potential impact: Low			
Schedule 15.3	Actual impact: Low			
	Audit history: Once			
From: unknown	Controls: Moderate			
To: 02-Feb-20	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	Controls are rated as moderate. Almost all the differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database.			
	The impact is assessed to be low. One 20W light was missing from the database, and estimated under submission is 85.4 kWh p.a. based on 4,271 annual burn hours.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Mercury will liaise with the customer to have the database updated accordingly.		July 20	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20		

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1	The database contains some inaccurate data.			
With: Clause 15.2 and 15.37B(b)	The database accuracy is assessed to be 91.5% indicating an estimated over submission of 202,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).			
	69 lamps have incorrect total wattages, resulting in estimated over submission of 110W or 470 kWh p.a. based on 4,271 burn hours.			
	Some addresses and GPS coordinates do item of load, particularly where the light boundary.	•	•	
	Potential impact: High			
	Actual impact: Unknown			
From: unknown	Audit history: Three times			
To: 05-Feb-20	Controls: Moderate			
	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
High	Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences. A small number of incorrect lamp wattages were identified.			
The impact is assessed to be high, based on the kWh differences descr Orion intends to investigate and correct the differences identified.				
Actions taken to resolve the issue		Completion date	Remedial action status	
Mercury will liaise with the customer to update the database to ensure accurate submission.		July 20	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20		

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2	The database contains some inaccurate data.			
With: Clause 15.2 and 15.37B(c)	The database accuracy is assessed to be 91.5% indicating an estimated over submission of 202,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).			
	69 lamps have incorrect total wattages, resulting in estimated over submission of 110W or 470 kWh p.a. based on 4,271 burn hours.			
	Submissions are calculated based on a snapshot at the end of the month.			
	Potential impact: High			
	Actual impact: Unknown			
	Audit history: Three times			
From: unknown	Controls: Moderate			
To: 05-Feb-20	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
High	Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences. A small number of incorrect lamp wattages were identified.			
	The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Mercury will liaise with the customer to update the database to ensure accurate submission. We will review our internal processes to comply with the EA memo.		July 20	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20		
We will review our internal processes to comply with the EA				

memo.