

Compliance plan for Nulite Illuminated Signs Ltd DUML–2020

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 11(1) of Schedule 15.3 From: 01-Jun-17 To: 31-Jan-20</p>	<p>Database discrepancies found in the field resulting in an estimated annual under submission of 37,397.9 kWh. The monthly spreadsheet used to calculate submission does not track changes at a daily basis. Potential impact: High Actual impact: High Audit history: Three times previously Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls in place are rated as weak as discrepancies identified in the last two audit reports have not been corrected. The impact is assessed to be high, based on the kWh differences detailed in section 3.1. and that this has been present for two years.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Database to be updated with auditor's field findings. 'End date' field to be added into database to track removal of items. Mercury will liaise with Nulite to ensure database accuracy.</p>	April 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Mercury to liaise with Nulite to ensure all changes are recorded and updated in the database as they happen. Additionally, we will be seeking confirmation from the customer every 2 months that the database is accurate to ensure correct market submission. The 'end date' field will record removal of items to ensure daily tracking and correct submission calculation.</p>	April 2020	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3 From: 01-Jun-17 To: 30-Apr-19	No lamp descriptions recorded only a total wattage is recorded. Potential impact: Low Actual impact: Unknown Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as moderate as this information has been requested from the customer but has not been provided as yet. The impact is assessed to be low as the volume of lights associated with this database are small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Customer does not have records of lamp descriptions. Further investigation is required on their end to gather correct data. Once confirmation of lamp descriptions is received, the database will be updated accordingly.		April 2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury to liaise with Nulite to ensure all changes are recorded and updated in the database as they happen. Additionally, we will be seeking confirmation from the customer every 2 months that the database is accurate to ensure correct market submission.		June 2020	

All load recorded in the database			
Non-compliance	Description		
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 01-Jun-17 To: 31-Jan-20	29 additional lights found in the field. Potential impact: High Actual impact: High Audit history: Three times previously Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls in place are rated as weak as discrepancies identified in the last two audit reports have not been corrected. The impact is assessed to be high, based on the kWh differences detailed in section 3.1. and that this has been present for two years.		
Actions taken to resolve the issue		Completion date	Remedial action status
Database to be updated with auditor's field findings. Mercury will liaise with Nulite to confirm MEEN load and ensure database accuracy.		April 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury to liaise with Nulite to ensure all changes are recorded and updated in the database as they happen. Additionally, we will be seeking confirmation from the customer every 2 months that the database is accurate to ensure correct market submission.		June 2020	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: 15.2 and 15.37B(b)</p> <p>From: 01-Jun-17</p> <p>To: 31-Jan-20</p>	<p>The field audit found 29 additional lights resulting in an estimated under submission of 37,397.9 kWh per annum.</p> <p>No lamp descriptions recorded only a total wattage is recorded.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls in place are rated as weak as discrepancies identified in the last two audit reports have not been corrected.</p> <p>The impact is assessed to be medium, based on the kWh differences described above and that this has been present for two years.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Database to be updated with auditor's field findings. Mercury will liaise with Nulite to confirm MEEN load and ensure database accuracy.</p> <p>Customer does not have records of lamp descriptions - further investigation required on their end to gather correct data. Once confirmation of lamp descriptions is received, the database will be updated accordingly.</p>	April 2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Mercury to liaise with Nulite to ensure all changes are recorded and updated in the database as they happen. Additionally, we will be seeking confirmation from the customer every 2 months that the database is accurate to ensure correct market submission.</p>	June 2020	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: 15.2 and 15.37B(c)</p> <p>From: 01-Jun-17</p> <p>To: 30-Apr-19</p>	<p>Under submission of 2,384.68 kWh due to the ICPs being recorded as decommissioned on the registry and not subsequently submitted.</p> <p>Database discrepancies found in the field resulting in an estimated annual under submission of 37,397.9 kWh.</p> <p>The monthly spreadsheet used to calculate submission does not track changes at a daily basis.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls in place are rated as weak as discrepancies identified in the last two audit reports have not been corrected.</p> <p>The impact is assessed to be high, based on the kWh differences detailed in section 3.1. and that this has been present for two years.</p>	
Actions taken to resolve the issue		Completion date
<p>Database to be updated with auditor's field findings. Mercury will liaise with Nulite to confirm MEEN load and ensure database accuracy.</p> <p>End date field to be added into database to track removal of items.</p>		April 2020
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Mercury to liaise with Nulite to ensure all changes are recorded and updated in the database as they happen. Additionally, we will be seeking confirmation from the customer every 2 months that the database is accurate to ensure correct market submission. Thee 'end date' field will record removal of items to ensure daily tracking and correct submission calculation.</p>		April 2020
Identified		