

Compliance plan for Marlborough Lines DUML – 2019

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3 From: 24-Oct-18 To: 31-Oct-19	The monthly wattage report provided does not track changes at a daily basis and is provided as a snapshot. Festive lighting recorded as connected all year. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code. The impact is assessed to be low based on the anticipated volumes associated with the non-compliances found.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis needs to advise Marlborough Lines of the requirement of load tracking. Establish what means Marlborough Lines require to adhere to the code requirement.	01/06/2020	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis will continue to work with Marlborough Lines and the Council to establish best practices.	01/06/2020	

Tracking of load change		
Non-compliance	Description	
Audit Ref: 2.6 Clause 11(3) of Schedule 15.3 From: 24-Oct-18 To: 31-Oct-19	Changes not tracked. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis needs to advise Marlborough Lines of the requirement of load tracking. Establish what means Marlborough Lines require to adhere to the code requirement.	01/06/2020	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis will continue to work with Marlborough Lines and the Council to establish best practices.	01/06/2020	

Audit trails		
Non-compliance	Description	
Audit Ref: 2.7 Clause 11(4) of Schedule 15.3 From: 24-Oct-18 To: 31-Oct-19	Audit trail not visible. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis needs to advise Marlborough Lines of the requirement of load tracking. Establish what means Marlborough Lines require to adhere to the code requirement.	01/06/2020	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis will continue to work with Marlborough Lines and the Council to establish best practices.	01/06/2020	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 06-May-18</p> <p>To: 31-Oct-19</p>	<p>Incorrect ballasts applied in EAM resulting in an estimated annual over submission of 7,231 kWh if these were used for submission.</p> <p>The monthly wattage report provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Festive lighting recorded as connected all year.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate as the ballasts are not derived from the database but are being added correctly for reconciliation purposes.</p> <p>The impact is assessed to be low due to the small amount of over submission associated with Christmas lights recorded as connected year-round.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis to request an monthly extraction of asset values from Marlborough Lines.		01/03/2020	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
Provide exception reporting back to Marlborough Lines recommending the updates to correct any values.		01/03/2020	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: 24-Oct-18 To: 31-Oct-19	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Festive lighting recorded as connected all year. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code. The impact is assessed to be low based on the anticipated volumes associated with the non-compliances found.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis needs to advise Marlborough Lines of the requirement of load tracking. Establish what means Marlborough Lines require to adhere to the code requirement.		01/06/2020	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Genesis will continue to work with Marlborough Lines and the Council to establish best practices.		01/06/2020	