

Compliance plan for Genesis NZTA Waikato West DUML– 2020

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 17.295F From: 01-Jun-18 To: 29-Nov-19	Audit not completed within the required timeframe. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as Genesis are reliant on the database provider to supply the data and in this case their delay to identify a database caused this audit to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis requested the audit to be conducted with the intent to engage with the NZTA Waikato administration.	2019	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 30-Nov-19</p>	<p>Outdated database or registry UML figures and not a current database used to calculate submission. This will be resulting in an estimated annual over submission of 20,449.58 kWh for the three ICPs where it was compared with the NZTA RAMM database extract.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as none as there is no current database available to accurately calculate submission from. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward.</p> <p>The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>NZTA are working on the RAMM data set to improve its detail.</p> <p>The Councils duplicated data as they had the NZTA lights listed against the council streetlight ICP not the NZTA ICP associated with those assets. The correct ICP has been established and historical revision information corrected, by Genesis.</p>		unknown	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Genesis are still working with NZTA to get complete and consistent information.</p>		unknown	

ICP Identifier			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 30-Nov-19</p>	<p>No database used to reconcile ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Once previously</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as none as the ICPs are being reconciled either using historic database information or the unmetered load details from the registry. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward.</p> <p>The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.		unknown	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.		unknown	

Location of each item of load			
Non-compliance	Description		
<p>Audit Ref: 2.3</p> <p>With: Clause 11(2)(b) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 30-Nov-19</p>	<p>No database used to reconcile ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as none as the ICPs are being reconciled either using historic database information or the unmetered load details from the registry. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward.</p> <p>The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.		unknown	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.		unknown	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c)&(d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 30-Nov-19</p>	<p>No database used to reconcile ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as none as the ICPs are being reconciled either using historic database information or the unmetered load details from the registry. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward.</p> <p>The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.		unknown	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.		unknown	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 30-Nov-19	No database used to reconcile ICPs. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as none as the ICPs are being reconciled either using historic database information or the unmetered load details from the registry. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward. The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.	unknown	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.	unknown	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: 11(4) of Schedule 15.3 From: Unknown To: 30-Nov-19	No database used to reconcile ICPs and therefore no audit trail. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as none as the ICPs are being reconciled either using historic database information or the unmetered load details from the registry. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward. The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.	unknown	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.	unknown	

Audit trail		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 30-Nov-19	No database used to reconcile ICPs. Potential impact: High Actual impact: Unknown Audit history: None Controls: None Breach risk rating: 12	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as none as there is no current database available to accurately calculate submission from. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward. The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.	unknown	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.	unknown	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 30-Nov-19</p>	<p>Outdated database or registry UML figures and not a current database used to calculate submission. This will be resulting in an estimated annual over submission of 20,449.58 kWh for the three ICPs where it was compared with the NZTA RAMM database.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as none as there is no current database available to accurately calculate submission from. This is expected to improve once the NZTA RAMM database is brought up to date and maintained going forward.</p> <p>The impact is assessed to be high as no current database is used for the reconciliation of these ICPs.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis are working with NZTA to get a complete and consistent data source.		unknown	Investigating
Preventative actions taken to ensure no further issue will occur		Completion date	
Levels of accuracy in NZTA database are still unknown but Genesis are currently reviewing whether is now possible to switch data sources.		unknown	