

## Compliance plan for Christchurch CC – 2020

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: 05-Feb-20</p>	<p><b>Orion</b></p> <p>288 lamps have incorrect total wattages, resulting in estimated over submission of 282.5W or 1,207 kWh p.a. based on 4,271 burn hours.</p> <p>41.852 kW relating to smart lights connected to “reconciled elsewhere” status ICPs 0007182097RN3F9, 0007182098RNC27 and 0007182100RN8D0, are reconciled under the DUMML ICP for the same NSP. The on hours for these ICPs may differ to the logger hours, because they are controlled by daylight sensors.</p> <p>Submissions are calculated based on a snapshot at the end of the month.</p> <p><b>Mainpower</b></p> <p>The database accuracy is assessed to be 92.4% indicating estimated over submission of 2,366 kWh per annum (based on 4,271 annual burn hours).</p> <p>There was a 271 W or 73.84 kWh difference between the database information and submission information for January 2020.</p> <p>A “comm date” and “installation year” are recorded in the database, but the dates may not be sufficient to determine exactly when a light was installed, and the fields are not always populated consistently.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p><b>Low</b></p>	<p>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.</p> <p>The impact is assessed to be low, based on the kWh differences described above. The smart light load is reconciled, but the difference in on hours may have a minor impact on submission.</p> <p>A list of discrepancies has been provided to Orion and Mainpower who are working to investigate and resolve them.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact Energy will work with Orion to ensure their database is accurate</p> <p>Contact Energy is continuing to work on a strategy that will satisfy the rules and regulations without a certified central metering system</p> <p>Contact Energy are to work on a process to be able to submit on any given day</p> <p>Contact Energy will work with Mainpower to ensure their database is accurate. We will work with Mainpower to ensure this database is capable of recording dates accurately and reporting on them</p>	TBA	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Contact Energy will continue to work with all parties to ensure their databases are accurate. We complete quarterly DUMML database checks and work with all parties on the results of these</p>	Ongoing	

All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 03-Feb-20</p>	<p><b>Mainpower</b></p> <p>Five L20 lamps situated on Pine Ave are not included in the database, resulting in estimated under submission of 100W or 427.10 kWh p.a. based on 4,271 burn hours.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as moderate, because most items of load are included in the database.</p> <p>The impact is assessed to be low based on an estimated under submission of 427.10 kWh p.a.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will work with our customers to ensure their database is accurate.	Ongoing	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy will continue to work with all parties to ensure their databases are accurate. We complete quarterly DUML database checks and work with all parties on the results of these	Ongoing	

Database accuracy	
Non-compliance	Description
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 05-Feb-20</p>	<p><b>Orion</b></p> <p>288 lamps have incorrect total wattages, resulting in an estimated over submission of 282.5W or 1,207 kWh p.a. based on 4,271 burn hours.</p> <p>Some addresses and GPS coordinates do not reflect the physical location of the item of load, particularly where the light is installed beyond the customer's boundary.</p> <p><b>Mainpower</b></p> <p>The database accuracy is assessed to be 92.4% indicating estimated over submission of 2,366 kWh per annum (based on 4,271 annual burn hours).</p> <p>Some street addresses do not reflect the street that the light is located on.</p> <p>A "comm date" and "installation year" are recorded in the database, but the dates may not be sufficient to determine exactly when a light was installed, and the fields are not always populated consistently.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>
Audit risk rating	Rationale for audit risk rating
<p><b>Low</b></p>	<p>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.</p> <p>The impact is assessed to be low, based on the kWh differences described above. A list of discrepancies has been provided to Orion and Mainpower who are working to investigate and resolve them.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact Energy will work with Orion to ensure their database is accurate</p> <p>Contact Energy is continuing to work on a strategy that will satisfy the rules and regulations without a certified central metering system</p> <p>Contact Energy are to work on a process to be able to submit on any given day</p> <p>Contact Energy will work with Mainpower to ensure their database is accurate. We will work with Mainpower to ensure this database is capable of recording dates accurately and reporting on them</p>	TBA	Identified
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<p>Contact Energy will continue to work with all parties to ensure their databases are accurate. We complete quarterly DUML database checks and work with all parties on the results of these</p>	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: unknown</p> <p>To: 05-Feb-20</p>	<p><b>Orion</b></p> <p>288 lamps have incorrect total wattages, resulting in estimated over submission of 282.5W or 1,207 kWh p.a. based on 4,271 burn hours.</p> <p>41.852 kW relating to smart lights connected to “reconciled elsewhere” status ICPs 0007182097RN3F9, 0007182098RNC27 and 0007182100RN8D0, are reconciled under the DUML ICP for the same NSP. The on hours for these ICPs may differ to the logger hours, because they are controlled by daylight sensors.</p> <p>Submissions are calculated based on a snapshot at the end of the month.</p> <p><b>Mainpower</b></p> <p>The database accuracy is assessed to be 92.4% indicating estimated over submission of 2,366 kWh per annum (based on 4,271 annual burn hours).</p> <p>There was a 271 W or 73.84 kWh difference between the database information and submission information for January 2020.</p> <p>A “comm date” and “installation year” are recorded in the database, but the dates may not be sufficient to determine exactly when a light was installed, and the fields are not always populated consistently.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times</p>

	<p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>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.</p> <p>The impact is assessed to be low, based on the kWh differences described above. The smart light load is reconciled, but the difference in on hours may have a minor impact on submission.</p> <p>A list of discrepancies has been provided to Orion and Mainpower who are working to investigate and resolve them.</p>	
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