

## Compliance plan for Porirua CC DUML – 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: 01-Aug-19</p> <p>To: 19-Feb-20</p>	<p>Potential under submission of 8,016 kWh p.a. due to incorrect on/off times.</p> <p>Potential over submission of 35,258 kWh p.a. due to incorrect wattages.</p> <p>Incorrect use of CST profile.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates not recorded for new connections.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in section 3.1.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances detailed above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has sort Logger information for burn hours and revisions will occur for historical periods.</p> <p>Genesis continues to provide feedback on Porirua CC asset information to influence change.</p>		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Continuation of discussions between Genesis and Porirua to influence information accuracy within their database. Genesis has discussed the new connections process with the council and advised, they need to ensure ownership is bestowed on the developer until the project is complete. Genesis has advised the council that the network also needs to play their part in the new connection/Development process and ensure the Trader is advised prior to livening any assets. Genesis has</p>		



Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Aug-19 To: 19-Feb-20	One item of load does not have sufficient location information to enable it to be readily locatable. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are rated as strong and the impact as low, because only one exception was identified.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will re-request the information for the one lamp be located and updated		Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis review the asset information and provide exception feedback to the customer.		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Aug-19 To: 19-Feb-20	36 lights have insufficient information to determine the light type. 67 lamp wattages were recorded as zero. Two gear wattages were recorded as zero. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	The controls are rated as moderate because most lamps have description and wattage information recorded but there is room for improvement. PCC has been working to populate the missing information. The audit risk rating is low based on the small volume of lights affected.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will re-request the information for the lamps detailed information to be updated asap			Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis review the asset information and provide exception feedback to the customer.			

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: 01-Aug-19</p> <p>To: 19-Feb-20</p>	<p>12 additional lamps in the field that were not recorded in the database.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>Controls are rated as moderate, as they are sufficient to ensure most lights are recorded in the database.</p> <p>The impact is rated as low, as only 12 lights were missing from the database, leading to a potential under submission of 4,890 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have re-request the information for the lamps detailed information to be updated asap.	01/07/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continuation of discussions between Genesis and Porirua to influence information accuracy within their database. Genesis has discussed the new connections process with the council and advised, they need to ensure ownership is bestowed on the developer until the project is complete. Genesis has advised the council that the network also needs to play their part in the new connection/Development process and ensure the Trader is advised prior to livening any assets.	unknown	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Aug-19</p> <p>To: 20-Feb-20</p>	<p>4,238 examples of incorrect or incomplete description or capacity information.</p> <p>Database is not confirmed as accurate with a 95% level of confidence.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates not recorded for new connections.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
<b>High</b>	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have re-request the information for the lamps detailed information to be updated asap		01/07/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Continuation of discussions between Genesis and Porirua to influence information accuracy within their database. Genesis has discussed the new connections process with the council and advised, they need to ensure ownership is bestowed on the developer until the project is complete. Genesis has advised the council that the network also needs to play their part in the new connection/Development process and ensure the Trader is advised prior to livening any assets.		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: 01-Aug-19</p> <p>To: 20-Feb-20</p>	<p>Potential under submission of 8,016 kWh p.a. due to incorrect on/off times.</p> <p>Potential over submission of 35,258 kWh p.a. due to incorrect wattages.</p> <p>Incorrect use of CST profile.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates not recorded for new connections.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in section 3.1.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls over the database are rated as weak, due to the large proportion of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is high based on kWh variances detailed above.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis have acquired logger information which will be used to measure on/off times.</p> <p>Genesis have spoken to PCC in regard to tracking of changes, however this is either a limitation of their RAMM system or user.</p>		Identified
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis continues to liaise with PCC where they have one dedicated staff member to action preventative measures. It is Genesis belief that these are being conducted where possible and resourcing issue plays a part in this management.</p>		