## Compliance plan for Porirua NZTA DUML – 2020

Distributed unmetered load audits			
Non-compliance	Description		
Audit Ref: 1.10	Database not audited within 3 months.		
With: Clause 16A.26	Potential impact: Medium		
and 17.295F	Actual impact: Medium		
	Audit history: None		
From: 01-Aug-19	Controls: Moderate		
To: 20-Feb-20	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate. Genesis worked reasonably quickly to identify a database and have an audit once it was identified that PCC was not responsible.  The audit risk rating is medium, because an earlier audit may have identified the submission inaccuracy sooner.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have worked with NZTA to progress the information required to meet the DUML guidelines. For this to be achieved Genesis had to separate the assets from the PCC dataset and establish the relationship with the NZTA. The settlement process will be revised upon NZTA accepting that the monthly kWh's will be increasing due to PCC's data being out dated.		01/04/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has established the provision of monthly information from NZTA Porirua's RAMM database.		01/04/2020	

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	Under submission of 206,454 kWh perdatabase.  Potential impact: High  Actual impact: High	r annum due to th	ne use of an inaccurate
From: 01-Aug-19	Audit history: None		
To: 19-Feb-20	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak because the most current database is not being used, and the most current database is not yet completely populated.		
	The audit risk rating is high based on kWh variances detailed above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis have worked with NZTA to progress the information required to meet the DUML guidelines. For this to be achieved Genesis had to separate the assets from the PCC dataset and establish the relationship with the NZTA. The settlement process will be revised upon NZTA accepting that the monthly kWh's will be increasing based off the information held within RAMM.		01/06/2020	Investigating
Preventative actions to	aken to ensure no further issues will occur	Completion date	
Genesis has established the provision of monthly information from NZTA Porirua's RAMM database. Genesis will be reviewing the information provided and report exceptions back to Capital Journey's for corrections to be made.		01/06/2020	
be reviewed and the Dist	at the new connection process should tributor, should not be allowing any without the trader's acceptance.		

ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2	Nine items of load with a blank ICP.		
With: Clause 11(2)(a)	Potential impact: Low		
and (aa) of Schedule 15.3	Actual impact: Low		
13.3	Audit history: None		
From: 01-Aug-19	Controls: None		
To: 19-Feb-20	Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are not in place to identify this type of discrepancy.		
	The audit risk rating is low based on the small number of discrepancies.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will request all asset ICP information to be updated		01/06/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has established the provision of monthly information from NZTA Porirua's RAMM database. Genesis will be reviewing the information provided and report exceptions back to Capital Journey's for corrections to be made.		01/06/2020	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	14 records do not have a lamp make and model.		
With: Clause 11(2)(b) of Schedule 15.3	340 records have an unknown make and model but have sufficient information to determine wattage.		
From: 01-Aug-19	221 lamp wattages are blank		
To: 19-Feb-20	348 gear wattages are blank		
	8 gear wattages are incorrect		
	Potential impact: High		
	Actual impact: Low		
	Audit history: None		
	Controls: None		
	Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are not in place to identify this type of discrepancy.		
	The audit risk rating is low because this data is not used for submission. If this data was used for submission, the error would be high.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will request all asset ICP information to be updated		01/06/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has established the provision of monthly information from NZTA Porirua's RAMM database. Genesis will be reviewing the information provided and report exceptions back to Capital Journey's for corrections to be made.		01/06/2020	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	A large number of discrepancies exist in the database.		
With: Clause 15.2 and	Potential impact: High		
15.37B(b)	Actual impact: Low		
5 04 4 40	Audit history: None		
From: 01-Aug-19	Controls: None		
To: 20-Feb-20	Breach risk rating: 5		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are not in place to identify this type of discrepancy.		
	The audit risk rating is low because this data is not used for submission. If this data was used for submission, the error would be high.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will request all asset ICP information to be updated		01/06/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has established the provision of monthly information from NZTA Porirua's RAMM database. Genesis will be reviewing the information provided and report exceptions back to Capital Journey's for corrections to be made.		01/06/2020	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	Under submission of 206,454 kWh perdatabase.  Potential impact: High  Actual impact: High  Audit history: None	r annum due to th	ne use of an inaccurate
From: 01-Aug-19	Controls: Weak		
To: 20-Feb-20	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak because the most current database is not being used.		
	The audit risk rating is high based on kWh variances detailed above.		
Actions ta	Actions taken to resolve the issue		Remedial action status
Genesis have worked with NZTA to progress the information required to meet the DUML guidelines. For this to be achieved Genesis had to separate the assets from the PCC dataset and establish the relationship with the NZTA. The settlement process will be revised upon NZTA accepting that the monthly kWh's will be increasing based off the information held within RAMM.		01/06/2020	Investigating
Preventative actions to	aken to ensure no further issues will occur	Completion date	
Genesis has established the provision of monthly information from NZTA Porirua's RAMM database. Genesis will be reviewing the information provided and report exceptions back to Capital Journey's for corrections to be made.		01/06/2020	
be reviewed and the Dist	at the new connection process should tributor, should not be allowing any without the trader's acceptance.		