

Compliance plan for Auckland Transport DUML – 2020

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 15-Jul-20 To: 20-Jul-20	Audit not completed by the due date. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate because the data is normally provided on time. There was a resourcing issue leading to this delay. The audit risk rating is minor because there is little impact.	
Actions taken to resolve the issue	Completion date	Remedial action status
A recent restructure resulted in a resourcing issue while tasks we being transitioned between our internal teams. We are confident that the new team responsible for DUML load management is now ready to manage our compliance obligations	Resolved	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 11(1) of Schedule 15.3</p> <p>From: 10-Oct-19 To: 25-Jul-20</p>	<p>Over submission because of dimming being used. The impact on submission is unknown.</p> <p>A variance exists between the database and the monthly report sent to Contact. the LED wattages being adjusted outside of RAMM resulting in the monthly report being less than the database output by approx. 6,163 kWh per annum.</p> <p>313 items of load with zero or blank wattage recorded indicating potential under submission of 66,841 kWh.</p> <p>In absolute terms, total annual consumption is estimated to be 936,700 kWh lower than the DUMML database indicates based on the field audit.</p> <p>Incorrect ballasts recorded in RAMM indicate over submission of an estimated 2,088 kWh over submission per annum.</p> <p>110 items of load with incorrect ICP and balancing area.</p> <p>Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate, as processes to improve the database accuracy have commenced.</p> <p>The audit risk rating is high due to the indicative kWh variances found for those that can be quantified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>Most of these issues are common recurrences for AT. Contact have been continuing to engage with AT to attempt to get them to ensure their data is accurate and we will continue to attempt to work with AT. AT are hesitant to adjust some of their processes due to their intentions of using a smart system. Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place</p> <p>Over submission due to dimming: Contact unsuccessfully attempted to get a profile approved by the Authority for static dimmed streetlights – with our migration of C&I load (including DUMML Streetlights) to our Simply Energy Settlement platform we are reviewing how to be able to improve our submission accuracy around dimmed streetlights.</p> <p>Variance because of manual adjustment: Until Contact has developed a process to manage static dimming we are unable to prevent the database owner from performing this process of manual adjustment that has not been approved by the EA</p> <p>Zero or blank Wattage: Contact are continuing to engage with AT to ensure they are updating their records accurately.</p> <p>Incorrect ballast: Contact are continuing to engage with AT to ensure they are updating their records accurately.</p> <p>Incorrect balancing area: Contact will work with AT to make sure they have their lights on the correct ICP's</p> <p>Changes during the month: Contact have advised AT that this is to be monitored now, we have also advised that we will be in contact when we have an idea of how we are going to achieve this</p>	<p>Ongoing</p> <p>Ongoing</p> <p>TBC</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p> <p>December 2020</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>Contact have been working with AT to attempt to get them to ensure their data is accurate and we will continue to attempt to work with AT. AT are hesitant to adjust some of their processes due to their intentions of using a smart system. Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place.</p>	<p>Ongoing</p>	

ICP identifier and items of load		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 10-Oct-19</p> <p>To: 25-Jul-20</p>	<p>4 items of load without an ICP recorded</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong because they mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact are continuing to work with AT to ensure they are updating their records accurately. AT were going through a process where they were having someone attend each light to confirm it's details, Contact will follow up to make sure this is still happening	Ongoing	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place. Contact will then ensure that attention remains focused on accurate records	Ongoing	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Mar-15 To: 25-Jul-20	7 items of load without location details Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Contact are to continue to work with AT to ensure they are updating their records accurately. AT were going through a process where they were having someone attend each light to confirm it's details, Contact will follow up to make sure this is still happening		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place. Contact will then ensure that attention remains focused on accurate records		Ongoing
Remedial action status		
Identified		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: 11(2)(c) and (d) of Schedule 15.3 From: 10-Oct-19 To: 25-Jul-20	313 items of load with blank or zero wattage recorded. 253 items of load with blank light description. 146 items of load with invalid descriptions Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate as the majority of the load is recorded in the RAMM database. The audit risk rating is high due to potential under submission of 66,841 kWh per annum		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact are to continue to work with AT to ensure they are updating their records accurately. AT were going through a process where they were having someone attend each light to confirm it's details, Contact will follow up to make sure this is still happening		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place. Contact will then ensure that attention remains focused on accurate records		Ongoing	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 10-Oct-19 To: 25-Jul-20	Not all load recorded in the database (17 additional lights found or 1.5% of the load sampled). Potential impact: High Actual impact: High Audit history: Multiple times Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The audit risk rating is medium due to the impact a 1.5% variance for this large database potentially has on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact are to continue to work with AT to ensure they are updating their records accurately. AT were going through a process where they were having someone attend each light to confirm it's details, Contact will follow up to make sure this is still happening		Ongoing	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place. Contact will then ensure that attention remains focused on accurate records		Ongoing	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 10-Oct-19</p> <p>To: 25-Jul-20</p>	<p>In absolute terms the installed capacity is estimated to be 219 kW lower than the database indicates.</p> <p>313 items of load with blank or zero no wattage recorded</p> <p>253 items of load with blank lamp description</p> <p>146 items of load were identified with an invalid light type description</p> <p>5,443 26.7 watt LEDs are recorded as 26 watts in the database</p> <p>110 items of load with incorrect ICPs</p> <p>160 items of load with a ballast discrepancy.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate. Whilst there are a large number of discrepancies, processes are being improved to ensure accuracy becomes better.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>		
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Preventative actions taken to ensure no further issues will occur		Completion date	
Contact will continue to promote accurate record keeping until such time that there is an approved Smart System in place. Contact will then ensure that attention remains focused on accurate records		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: 10-Oct-19</p> <p>To: 25-Jul-20</p>	<p>Over submission because of dimming being used. The impact on submission is unknown.</p> <p>A variance exists between the database and the monthly report sent to Contact. the LED wattages being adjusted outside of RAMM resulting in the monthly report being less than the database output by approx. 6,163 kWh per annum.</p> <p>313 items of load with zero or blank wattage recorded indicating potential under submission of 66,841 kWh.</p> <p>In absolute terms, total annual consumption is estimated to be 936,700 kWh lower than the DUMML database indicates based on the field audit.</p> <p>Incorrect ballasts recorded in RAMM indicate over submission of an estimated 2,088 kWh over submission per annum.</p> <p>110 items of load with incorrect ICP and balancing area.</p> <p>Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate, as processes to improve the database accuracy have commenced.</p> <p>The audit risk rating is high due to the indicative kWh variances found for those that can be quantified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

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