

# Compliance plan for Mackenzie District Council for Contact Energy Limited 2020

Title: 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-Feb-20</p> <p>To: 29-Feb-20</p>	<p>Submissions are not calculated based on database information, but there is no impact because the values used for submission match the database.</p> <p>It is likely that the database is still not accurate within <math>\pm 5\%</math>, because no corrections were made following the 2018 audit. The database accuracy is assessed to be 108.6% indicating an estimated under submission of 800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Light ID 973 is recorded 36w Low Pressure Sodium (45W total) but is expected to be 35W Low Pressure Sodium (44W total), which could result in over submission of 4 kWh per annum.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate.</p> <p>The impact is assessed to be low because:</p> <ul style="list-style-type: none"> <li>• there is no difference between the database wattages and the wattages used for submission, and</li> <li>• the estimated under submission for database inaccuracies is 800 kWh p.a.</li> </ul>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact will work with MDC's agent Timaru DC to get the database updated with the correct values and attributes. We will also back date this correction and also adjust our submission volumes to ensure all consumption volume is accounted for since the previous audit.</p> <p>Unfortunately due to a restructure within Contact at the time of the previous audit this interaction was not followed up at Contacts end resulting in this non-compliance remaining.</p>	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<b>Title: All load recorded in database</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 01-Mar-20 To: 01-Mar-20	Six additional lamps found in the field in 2018 have not been added into the database, which could lead to estimated under submission of 198 W or 845 kWh per annum.  Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as moderate because they mitigate risk most of the time but some errors still occur. TDC intends to visit the affected lights to determine the correct details and will update the database.  The impact is low based on the annual kWh difference.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Contact will work with MDC's agent Timaru DC to get the database updated with the correct values and attributes. We will also back date this correction and also adjust our submission volumes to ensure all consumption volume is accounted for since the previous audit.  Unfortunately due to a restructure within Contact at the time of the previous audit this interaction was not followed up at Contacts end resulting in this non-compliance remaining.	Dec 2020	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

<b>Title: Database accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)  From: 01-Mar-20 To: 01-Mar-20	It is likely that the database is still not accurate within $\pm 5\%$ , because no corrections were made following the 2018 audit. The database accuracy is assessed to be 108.6% indicating an estimated under submission of 800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool). Light ID 973 is recorded 36w Low Pressure Sodium (45W total) but is expected to be 35W Low Pressure Sodium (44W total).  Potential impact: Low Actual impact: Unknown Audit history: Once Controls: Moderate Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as moderate because of the number of incorrect lamp type and wattage differences.</p> <p>The impact is low, because the estimated under submission for database inaccuracies is 800 kWh per annum.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Contact will work with MDC's agent Timaru DC to get the database updated with the correct values and attributes. We will also back date this correction and also adjust our submission volumes to ensure all consumption volume is accounted for since the previous audit.</p> <p>Unfortunately due to a restructure within Contact at the time of the previous audit this interaction was not followed up at Contacts end resulting in this non-compliance remaining.</p>		Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Title: Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clauses 15.2 and 15.37B(c)</p> <p>From: 01-Feb-20</p> <p>To: 29-Feb-20</p>	<p>Submissions are not calculated based on database information, but there is no impact because the values used for submission match the database.</p> <p>It is likely that the database is still not accurate within <math>\pm 5\%</math>, because no corrections were made following the 2018 audit. The database accuracy is assessed to be 108.6% indicating an estimated under submission of 800 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Light ID 973 is recorded 36w Low Pressure Sodium (45W total) but is expected to be 35W Low Pressure Sodium (44W total), which could result in over submission of 4 kWh per annum.</p> <p>Potential impact: Low</p> <p>Actual impact: Unknown</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>
Audit risk rating	Rationale for audit risk rating
Low	<p>The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate.</p> <p>The impact is assessed to be low because:</p> <ul style="list-style-type: none"> <li>• there is no difference between the database wattages and the wattages used for submission, and</li> <li>• the estimated under submission for database inaccuracies is 800 kWh p.a.</li> </ul>

Actions taken to resolve the issue	Completion date	Remedial action status
Contact will engage with TDC to ensure a monthly report of DUML is received and validates our submission volumes on an ongoing basis	Mar 2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	