

## Compliance plan for Central Otago DC DUML – 2020

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Sep-19 To: 05-Aug-20</p>	<p>A discrepancy between the submission volume and the database resulting in an estimated under submission of 2,400 kWh for May 2020.</p> <p>Database is not confirmed as accurate with a 95% level of confidence, resulting in over submission of 19,000 kWh per annum.</p> <p>Over submission of an estimated 25,000 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.</p> <p>The data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>Medium</b></p>	<p>The controls are rated as none as there is no process in place to submit the correct consumption volumes for the hard-wired dimming which represents 83% of the lights in the CODC area.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis to date have implemented new ICP's for the LED assets enabling separation and future reporting mechanisms. Genesis and the council have identified assets to meter to enable data to verify load drop. This data analysis with help support profile enabling compliant settlement. Discussions have been had in regards to finding solutions to the tracking of changes I RAMM.</p>		<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis is currently working through the issues with the council.</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-Sep-19 To: 05-Aug-20	18 items of load without GPS coordinates or street number. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Genesis will request the information be updated asap.		01/10/2020
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis have been working through the more complex issues that have been identified in the previous audits. The review of their data has been relatively brief. Genesis will be reconvening their review of their datasets know the separation of assets has occurred.		01/10/2020
		Identified

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) of Schedule 15.3</p> <p>From: 01-Sep-19</p> <p>To: 05-Aug-20</p>	<p>39 items of load with no lamp description recorded.</p> <p>One item of load with no ballast value recorded resulting in a very minor amount of under submission.</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 they ensure most information is accurate.</p> <p>The impact is assessed to be low due to the small number of lights affected.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis populate any missing wattage information to record for both billing and settlement processes. The findings although relative have little to no material impact on settlement outcomes.</p> <p>Genesis will be advising the council to correct these instances.</p>		
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis will be advising the council to update the asset details.</p>		01/10/2020
Remedial action status		
Identified		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Sep-19 To: 05-Aug-20	One additional light found in the field. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because they ensure most information is accurate. The impact is assessed to be low due to only one additional light found in the field in relation to the overall count of the items of load.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will be requesting CODC to add the additional lamp into its database	01/10/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Discuss asset management with the council.	01/10/2020	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Sep-19</p> <p>To: 05-Aug-20</p>	<p>Database is not confirmed as accurate with a 95% level of confidence.</p> <p>One 70W HPS lamp with no ballast applied.</p> <p>39 items of load with unknown lamp type.</p> <p>18 items of load without GPS coordinates and street number.</p> <p>New lights not recorded from date of installation.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate, because field audit indicated the controls are robust but there is room for errors to occur.</p> <p>The impact is assessed to be medium due to the kWh impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will be requesting the council to address the exceptions noted in the audit if they have not yet been completed.</p> <p>The new connection process is again an issue that many councils face with the network not playing their part. The indicative completion date does not refer to the correction of this process due to the complexity around actually get the network to stop their current process and engage with the council to ensure that all developments are the responsibility of the developer and are not assigned a temporary ICP until work is completed and the council takes responsibility.</p>	01/10/2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis proactively provides the Council with exception reports when exceptions are identified. The missing ballast will be added during the reconciliation &amp; billing processes. The small amount of unknown lamp types will generally have a lamp &amp; gear wattage and therefore has very little to no impact on the settlement process as does the missing locational details.</p>	01/10/2020	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2 Clause 15.2 and 15.37B(c)</p> <p>From: 01-Sep-19 To: 05-Aug-20</p>	<p>A discrepancy between the submission volume and the database resulting in an estimated under submission of 2,400 kWh for May 2020.</p> <p>Database is not confirmed as accurate with a 95% level of confidence, resulting in over submission of 19,000 kWh per annum.</p> <p>Over submission of an estimated 25,000 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.</p> <p>The data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</p> <p>Controls: None</p> <p>Breach risk rating: 8</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as none as there is no process in place to submit the correct consumption volumes for the hard-wired dimming which represents 83% of the lights in the CODC area.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has initially settled the volumes as an estimation, due to not being able to populate the streetlighting information prior to settlement deadlines. The data has since been loaded and will rectify any under submission, as the revision process should. The billing of our customer of that estimation is a problem Genesis will have to discuss with their customer.</p> <p>The implementation of new ICP's for the LED assets has been completed. Genesis are currently waiting for the council to initiate the new connection process for individual asset(s) to have a MMHHR meter installed. The meter will provide Genesis with the information required to support their application for a profile enabling the reconciliation process to become compliant. Both the council and Genesis are aware that this currently is not compliant but trying to make the settlement be compliant without a certified profile also makes the process non-compliant.</p> <p>The completion date of the certification is unknown until Genesis able to install and gather interval data to support any application.</p>	unknown	Identified

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The forward estimation was done for the council in May due to not being able to populate the required information in due to resource constraints during that period. The estimation routine is done by our NHH reconciliation tool which has a compliant forward estimation process and will be Utilising the system information in order to calculate the monthly kWh. The information post settlement has been inserted into the system and will wash up any potential inaccuracies that may have been detected.</p>	<p>unknown</p>	