

## Compliance Plan for NZTA Northland – Sept 2020

<b>Distributed unmetered load audits</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 1.10 Clause 17.295F of part 17  From: 15-Jun-20 To: 31-Jul-20	Audit not completed within the required timeframe.  Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as strong, as Genesis are reliant on the database provider to supply the data and in this case the delay caused this report to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Genesis engaged with the auditor to initiate the audit	07/08/2020	Cleared
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Genesis were hoping the field audit was conducted and the information was ready for input, however this was not the case so Genesis proceeded with the audit knowing that the database status was unchanged.	07/07/2020	

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 15-Dec-18</p> <p>To: 31-Jul-20</p>	<p>Database not used for submission resulting in a potential under submission of 89,592.11 kWh per annum.</p> <p>164 items of load have no recorded wattage recorded in the DUMML database which would result in under submission of 117,675 kWh per annum if used for submission.</p> <p>422 items of load have the incorrect ballast recorded in the DUMML database which would result in under submission of 7,218 kWh per annum if used for submission.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in <b>section 3.1</b>.</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: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as weak as the database has a high level of inaccuracy indicating controls are weak, and it is not used for submission purposes.</p> <p>The impact is assessed to be high due to the kWh volumes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has spoken with the NZTA lead at Northland NZTA, He has advised that he has iterated that the field audit is a must to complete but is requiring funding to complete.		unknown	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has provided both NZTA and Top Energy a copy of a desk top audit highlighting all assets associated with the Northland NZTA under the responsibility of Genesis Energy. Genesis has provided both Parties a copy of the dataset which has highlighted the ICP's for each asset. Genesis plans to use this data set until the field audit can be completed by the NZTA.		01/09/2020	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 15-Dec-18 To: 31-Jul-20	164 lights with no input wattage being recorded resulting in under submission of an estimated 117,675 kWh if the database were used for submission. Potential impact: High Actual impact: High Audit history: Three times Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
<b>High</b>	Controls are rated as weak as the database has not been updated to reflect the field information. The risk is high due to the impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has requested that Northland NZTA do the field audit to remove the inaccuracy of information currently held by both Distributor and customer.		unknown	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has provided both NZTA and Top Energy a copy of a desk top audit highlighting all assets associated with the Northland NZTA under the responsibility of Genesis Energy. Genesis has provided both Parties a copy of the dataset which has highlighted the ICP's for each asset. Genesis plans to use this data set until the field audit can be completed by the NZTA.		01/09/2020	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: To: 30-Nov-19	13 additional lights were found in the field.  Potential impact: High Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as weak as the database has not been updated to reflect the field information. The impact is assessed to be medium due to the kWh volumes.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has requested that Northland NZTA do the field audit to remove the inaccuracy of information currently held by both Distributor and customer.	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has provided both NZTA and Top Energy a copy of a desk top audit highlighting all assets associated with the Northland NZTA under the responsibility of Genesis Energy. Genesis has provided both Parties a copy of the dataset which has highlighted the ICP's for each asset. Genesis plans to use this data set until the field audit can be completed by the NZTA.	01/09/2020	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 15-Dec-18</p> <p>To: 31-Jul-20</p>	<p>Database is not confirmed as accurate with a 95% level of confidence.</p> <p>422 items of permanent load have the incorrect ballast applied indicating over submission of 7,218 kWh per annum if it were used for submission.</p> <p>164 lights with no input wattage being recorded resulting in under submission of an estimated 117,675 kWh if the database were used for submission.</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 are rated as weak as the database has not been updated to reflect the field information.</p> <p>The impact is assessed to be high due to the kWh volumes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has requested that Northland NZTA do the field audit to remove the inaccuracy of information currently held by both Distributor and customer.		unknown	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has provided both NZTA and Top Energy a copy of a desk top audit highlighting all assets associated with the Northland NZTA under the responsibility of Genesis Energy. Genesis has provided both Parties a copy of the dataset which has highlighted the ICP's for each asset. Genesis plans to use this data set until the field audit can be completed by the NZTA.		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: 15-Dec-18</p> <p>To: 31-Jul-20</p>	<p>Database not used for submission resulting in a potential under submission of 89,592.11 kWh per annum.</p> <p>164 items of load have no recorded wattage recorded in the DUMML database which would result in under submission of 117,675 kWh per annum if used for submission.</p> <p>422 items of load have the incorrect ballast recorded in the DUMML database which would result in under submission of 7,218 kWh per annum if used for submission.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in <b>section 3.1</b>.</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: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak as the database has a high level of inaccuracy indicating controls are weak and it is not used for submission purposes.</p> <p>The impact is assessed to be high due to the kWh volumes.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has requested that Northland NZTA do the field audit to remove the inaccuracy of information currently held by both Distributor and customer.	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has provided both NZTA and Top Energy a copy of a desk top audit highlighting all assets associated with the Northland NZTA under the responsibility of Genesis Energy. Genesis has provided both Parties a copy of the dataset which has highlighted the ICP's for each asset. Genesis plans to use this data set until the field audit can be completed by the NZTA.	01/09/2020	