

Compliance plan for Nelson City Council DUML – 2020

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown To: 29-Feb-20</p>	<p>Under submission of 9,408 kWh for ICP 0000200190CTC63 due to lack of database information being provided to Genesis.</p> <p>The database accuracy is assessed to be 95.3% of the database for the sample checked indicating a potential over submission of approximately 61,400 kWh per annum.</p> <p>3 items of load have zero wattage with an estimated annual under submission of 1,064 kWh.</p> <p>31 items of load with the incorrect ballast applied resulting in an estimated minor annual under submission of 393 kWh.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High Actual impact: High Audit history: Twice previously Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated overall as moderate as Genesis have robust controls in place in relation to submission, but the assessment of the database indicates that the controls in place to provide an accurate database are weak for the NZTA and private lights.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The internal notification issue has been addressed. The reporting of information has been established and will work with the council to address the historical issues within the database.	01/09/2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
The team was unable to access the relevant information for settlement due to an internal issue. Genesis also has just inherited the database from the losing trader in its current state. Genesis will review the reported information as required.	01/04/2020	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-May-18 To: 29-Feb-20	Three items of load have unknown or blank lamp model, and zero wattage. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong because they mitigate risk to an acceptable level. The impact is low, because there only three items of load with incorrect data.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has requested the description detail inaccuracies be addressed, completion date maybe impacted due to COVID-19.	01/09/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis review data supplied and provide feed back on any exceptions found.	01/04/2020	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 07-Sep-19 To: 29-Feb-20	Nine additional items of load found in the field. Potential impact: High Actual impact: High Audit history: None Controls: Moderate Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as moderate overall as NCC have robust controls in place in relation to the NCC owned lights, but controls are weak/none for the 10% of NZTA and private lights recorded in the database. The impact is high as indicated by the database accuracy findings detailed in section 3.1 .	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has requested the description detail inaccuracies be addressed, completion date maybe impacted due to COVID-19. The current NZTA arrangement will need to be outlined to highlight any discrepancies between the asset database and the field.	01/09/2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis review data supplied and provide feedback on any exceptions found.	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: 07-Sep-19</p> <p>To: 29-Feb-20</p>	<p>The database accuracy is assessed to be 95.3% of the database for the sample checked indicating a potential over submission of approximately 61,400 kWh per annum.</p> <p>3 items of load have zero wattage with an estimated annual under submission of 1,064 kWh.</p> <p>31 items of load with the incorrect ballast applied resulting in an estimated minor annual under submission of 393 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice previously</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 overall, because they are sufficient to ensure that database wattage is accurate for the bulk of lights which belong to NCC council lights but the controls for the accuracy of the NZTA and private lights are weak.</p> <p>The impact is assessed to be high, because over submission may be occurring of approx. 61,400 kWh per annum based on the database accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has requested the description detail inaccuracies be addressed, Private lighting needs to be confirmed and liaise with the distributor to action the necessary requirements. Completion date maybe impacted due to COVID-19.</p> <p>Genesis has approached the distributor to administer the assets as SUML and assign the appropriate site to a distributor only ICP. Genesis is awaiting confirmation from the distributor as to their intentions.</p>	01/09/2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis review data supplied and provide feedback on any exceptions found.	01/04/2020	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 29-Feb-20</p>	<p>Under submission of 9,408 kWh for ICP 0000200190CTC63 due to lack of database information being provided to Genesis.</p> <p>The database accuracy is assessed to be 95.3% of the database for the sample checked indicating a potential over submission of approximately 61,400 kWh per annum.</p> <p>3 items of load have zero wattage with an estimated annual under submission of 1,064 kWh.</p> <p>31 items of load with the incorrect ballast applied resulting in an estimated minor annual under submission of 393 kWh.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice previously</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 overall as moderate as Genesis have robust controls in place in relation to submission, but the assessment of the database indicates that the controls in place to provide an accurate database are weak for the NZTA and private lights.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has requested the description detail inaccuracies be addressed. The current NZTA arrangement will need to be outlined to highlight any discrepancies between the asset database and the field. completion date maybe impacted due to COVID-19.		01/09/2020	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis review data supplied and provide feedback on any exceptions found.		01/09/2020	