

# Compliance plan for Wellington 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: 01-Dec-18 To: 29-Feb-20</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> <li>• The field data was 95.1% of the database data for the sample checked. This will result in potential over submission of 85,900 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• 347 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer’s specifications available. The impact of these differences is estimated to approximately 19,583 kWh per annum of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• Nine items of load have missing, incomplete or unknown lamp wattages and descriptions, and 78 items of load have missing, incomplete or unknown gear wattages and descriptions. The combined impact is estimated to be approximately 6,494 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low.</li> <li>• Static dimming was not correctly applied for 202 of the 9,312 statically dimmed lamps. The impact is expected to be approximately 20,642 kWh per annum under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• The wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,520kWh annually.</li> <li>• 65 Christmas lights do not have ICP numbers recorded.</li> </ul> <p>Potential impact: High Actual impact: High Audit history: Once Controls: Weak Breach risk rating: 6</p>

Audit risk rating	Rationale for audit risk rating		
<b>High</b>	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in <b>section 3.1</b>.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The provision of monthly exception management reporting outlines any erroneous information within the customers data.		current	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to provide exception management reporting to WCC.		current	

ICP identifier			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 29-Feb-20</p>	<p>ICP number is not recorded for 65 Christmas lights.</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		
<b>Low</b>	<p>Controls are rated as strong as the bulk of the lights have an ICP assigned and are recorded against the correct ICP.</p> <p>The impact is low/ none as this volume has now been submitted and the number of lights potentially assigned to the incorrect ICP are minor.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Provide WCC with the indicative ICP associated with each asset. Genesis will need to ensure that the assets are distinguishable due to the seasonality of the activeness of these lamps.		01/08/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to provide exception management reporting to WCC.		current	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clauses 11(2)(c) and (d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 29-Feb-20</p>	<p>Some description and capacity information is incomplete or unknown, including:</p> <ul style="list-style-type: none"> <li>• 148 lamps with unknown or blank lamp descriptions,</li> <li>• nine items of load with zero wattage recorded, and</li> <li>• 78 blank gear wattages.</li> </ul> <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>Controls are rated as moderate, as they are sufficient to ensure that almost all items of load have wattage and description information recorded.</p> <p>The impact is estimated to be low, based on the information available.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
The provision of monthly exception management reporting outlines any erroneous information within the customers data.		current	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to provide exception management reporting to WCC.		Current	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11(2A) of Schedule 15.3  From: 01-Feb-19 To: 29-Feb-20	Two additional items of load found in the field audit.  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>	Controls are rated as moderate, as they are sufficient to ensure that the majority of items of load are recorded in the database.  The impact is estimated to be low, based on the information available.	
Actions taken to resolve the issue	Completion date	Remedial action status
The provision of monthly exception management reporting outlines any erroneous information within the customers data. In this instance Genesis would not be able to ascertain, and would rely on the accuracy of the exception management processes of WCC and any 3 <sup>rd</sup> party contractor.	01/10/2020	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis provided exceptions found in the report to enable WCC to investigate the field v asset database.	01/10/2020	



Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have advised the customer that it is expected the wattage discrepancies will be rectified.	01/10/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continue to work with our customer and 3 <sup>rd</sup> party contractors to remind them of their responsibilities in maintaining or changing items of load associated DUML.	01/07/2020	

Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Dec-18</p> <p>To: 29-Feb-20</p>	<p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> <li>• The field data was 95.1% of the database data for the sample checked. This will result in potential over submission of 85,900 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• 347 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer’s specifications available. The impact of these differences is estimated to approximately 19,583 kWh per annum of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• Nine items of load have missing, incomplete or unknown lamp wattages and descriptions, and 78 items of load have missing, incomplete or unknown gear wattages and descriptions. The combined impact is estimated to be approximately 6,494 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low.</li> <li>• Static dimming was not correctly applied for 202 of the 9,312 statically dimmed lamps. The impact is expected to be approximately 20,642 kWh per annum under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</li> <li>• The wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,520kWh annually.</li> <li>• 65 Christmas lights do not have ICP numbers recorded.</li> </ul> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in <b>section 3.1</b>.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Revised submission data will be provided to resolve the submission issues.</p>



Actions taken to resolve the issue	Completion date	Remedial action status
Genesis have advised the customer that it is expected the wattage discrepancies will be rectified. The remedial action has been identified through the audit, Which provides Genesis with the insight of the current state of the customers dataset.	01/10/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continue to work with our customer and 3 <sup>rd</sup> party contractors to remind them of their responsibilities in maintaining or changing items of load associated DUML.	01/07/2020	