## Compliance plan for Waitomo DC DUML – 2020

| Non-compliance  | Deriving submission information  |  |                    |                        |
|---|--|--|--------------------|------------------------|
| higher than the DUML database indicates Under submission of 1,553 kWh p.a. for private lights. The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Livening dates are not recorded for new connections, and lamp installation dates are replaced where lights change. Potential impact: High Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4  Medium  Improvements have been made during the audit period. NZTA and festive lights are now being submitted correctly. I have recorded the controls as moderate; however, there are still some improvements required. There is a medium impact on settlement because there is potential under submission of 13,253 kWh per annum.  Actions taken to resolve the issue  Completion date  Audit results will be provided to the council to correct the errors identified. Ownership of unresolved private lights will be clarified with TLC and Waitomo DC. We will clarify with Waitomo DC whether NZTA lights are to remain in the database or whether there are plans for these to be recorded and managed in an NZTA database. If these are to remain we will follow up on assignment of an ICP and confirm the change management process for these lights.  Preventative actions taken to ensure no further issues will  Completion  Completion  March 2021   | Non-compliance   | Des  | scription          |                        |
| Schedule 15.3  Under submission of 1,553 kWh p.a. for private lights.  The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.  Livening dates are not recorded for new connections, and lamp installation dates are replaced where lights change.  Potential impact: High Actual impact: Medium Audit history: Once Controls: Moderate Breach risk rating: 4  To: 30-Oct-20  Audit risk rating  Rationale for audit risk rating  Medium  Improvements have been made during the audit period. NZTA and festive lights are now being submitted correctly. I have recorded the controls as moderate; however, there are still some improvements required.  There is a medium impact on settlement because there is potential under submission of 13,253 kWh per annum.  Actions taken to resolve the issue  Completion date  Audit results will be provided to the council to correct the errors identified.  Ownership of unresolved private lights will be clarified with TLC and Waitomo DC.  We will clarify with Waitomo DC whether NZTA lights are to remain in the database or whether there are plans for these to be recorded and managed in an NZTA database. If these are to remain we will follow up on assignment of an ICP and confirm the change management process for these lights.  Preventative actions taken to ensure no further issues will  Completion  Completion  March 2021 |  | · ·  |                    |                        |
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| remain in the database or whether there are plans for these to be recorded and managed in an NZTA database. If these are to remain we will follow up on assignment of an ICP and confirm the change management process for these lights.  Preventative actions taken to ensure no further issues will  Completion   |  |  | 31 Dec 2020        |                        |
| P   | remain in the database or whether there are plans for these to<br>be recorded and managed in an NZTA database. If these are<br>to remain we will follow up on assignment of an ICP and |  | March 2021         |                        |
|   | Preventative actions to  |  | -                  |                        |
|   |  |  |                    |                        |

| ICP identifier and items of load   |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Description  |                 |                        |
| Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule  | ICP numbers are not recorded in the database for 201 NZTA urban lights and ten private lights.  Potential impact: Medium |                 |                        |
| 15.3   | Actual impact: Low   |                 |                        |
| From: 01-Apr-19 To: 30-Oct-20  | Audit history: Twice  Controls: Weak  Breach risk rating: 3  |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| Low  | The controls are recorded as weak because the NZTA and private lights still don't have ICPs recorded.                    |                 |                        |
|  | The impact is low because submission is occurring for NZTA lights, but not private lights.                               |                 |                        |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| Ownership of unresolved private lights will be clarified with TLC and Waitomo DC.  |  | 31 Dec 2020     | Investigating          |
| We will clarify with Waitomo DC whether NZTA lights are to remain in the database or whether there are plans for these to be recorded and managed in an NZTA database. If these are to remain we will follow up on assignment of an ICP. |  | March 2021      |                        |
| Preventative actions taken to ensure no further issues will occur  |  | Completion date |                        |
|  |  |                 |                        |

| All load recorded in database  |  |                 |                        |
|--|--|-----------------|------------------------|
| Non-compliance   | Des  | scription       |                        |
| Audit Ref: 2.5   | One additional light identified.   |                 |                        |
| With: Clause 11(2A) of   | Potential impact: Medium   |                 |                        |
| Schedule 15.3  | Actual impact: Low   |                 |                        |
|  | Audit history: None  |                 |                        |
| From: 01-Jan-20  | Controls: Moderate   |                 |                        |
| To: 30-Oct-20  | Breach risk rating: 2  |                 |                        |
| Audit risk rating  | Rationale for audit risk rating  |                 |                        |
| Low  | 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.                          |                 | erefore the audit risk |
| Actions taken to resolve the issue   |  | Completion date | Remedial action status |
| Details of the additional light will be provided to the council to update in the database. |  | 31 Nov 2020     | Identified             |
| Preventative actions taken to ensure no further issues will occur                          |  | Completion date |                        |
|  |  |                 |                        |

| Database accuracy   |  |                 |                        |
|---|--|-----------------|------------------------|
| Non-compliance  | Description  |                 |                        |
| Audit Ref: 3.1 With: Clause 15.2 and  | In absolute terms, total annual consumption is estimated to be 11,700 kWh higher than the DUML database indicates  |                 |                        |
| 15.37B(b)   | Under submission of 1,553 kWh p.a. for private lights.   |                 |                        |
|   | The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.   |                 |                        |
|   | Livening dates are not recorded for new connections, and lamp installation dates are replaced where lights change.   |                 |                        |
|   | Potential impact: High   |                 |                        |
| 1   | Actual impact: Medium  |                 |                        |
|   | Audit history: Twice   |                 |                        |
| From: 01-Apr-19   | Controls: Moderate   |                 |                        |
| To: 30-Oct-20   | Breach risk rating: 4  |                 |                        |
| Audit risk rating   | Rationale for audit risk rating  |                 |                        |
| Medium  | Improvements have been made during the audit period. NZTA and festive lights are now being submitted correctly. I have recorded the controls as moderate; however, there are still some improvements required. |                 |                        |
|   | There is a medium impact on settlement because there is potential under submission of 13,253 kWh per annum.  |                 |                        |
| Actions taken to resolve the issue  |  | Completion date | Remedial action status |
| Audit results will be provided to the council to correct the errors identified.   |  | 30 Nov 2020     | Identified             |
| Ownership of unresolved private lights will be clarified with TLC and Waitomo DC.   |  | 31 Dec 2020     |                        |
| We will clarify with Waitomo DC whether NZTA lights are to remain in the database or whether there are plans for these to be recorded and managed in an NZTA database. If these are to remain we will follow up on assignment of an ICP and confirm the change management process for these lights. |  | March 2021      |                        |
| Preventative actions to   | aken to ensure no further issues will occur  | Completion date |                        |
|   |  |                 |                        |
|   |  |                 |                        |

| Volume information accuracy   |   |                 |                        |
|---|---|-----------------|------------------------|
| Non-compliance  | Description   |                 |                        |
| Audit Ref: 3.2 With: Clause 15.2 and  | In absolute terms, total annual consumption is estimated to be 11,700 kWh higher than the DUML database indicates   |                 |                        |
| 15.37B(c)   | Under submission of 1,553 kWh p.a. for private lights.  |                 |                        |
|   | The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.  |                 |                        |
|   | Livening dates are not recorded for new connections, and lamp installation dates are replaced where lights change.  |                 |                        |
|   | Potential impact: High  |                 |                        |
|   | Actual impact: Medium   |                 |                        |
| From: 01-Apr-19   | Audit history: Once   |                 |                        |
| To: 30-Oct-20   | Controls: Moderate  |                 |                        |
|   | Breach risk rating: 4   |                 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |
| Medium  | Improvements have been made during the audit period. NZTA and festive lights are now being submitted correctly. I have recorded the controls as moderate; however, there are still some improvements required.  There is a medium impact on settlement because there is potential under |                 |                        |
|   | submission of 13,253 kWh per annum  |                 |                        |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |
| Audit results will be provided to the council to correct the errors identified.   |   | 30 Nov 2020     | Identified             |
| Ownership of unresolved private lights will be clarified with TLC and Waitomo DC.   |   | 31 Dec 2020     |                        |
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