Compliance plan for Ruapehu District Council (Trustpower) – 2020

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	The database is not confirmed as accura	te with a 95% leve	el of confidence.
With: Clause 11(1) of Schedule 15.3	The wattages supplied by Alf Downs were not applied for ICPs 0001111171WM17A, 0001111172WMDBA and 0008807442WME14 for June 2020, resulting in over submission of 135 kWh.		
	Pole ID 1998 had a blank gear wattage and gear wattage description, when "no gear" and zero is expected.		
	Pole ID 2117 had a blank ICP group, and was updated to ICP 0008807442WME14 during the audit.		
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.		
	The installation and change dates recorded in the database reflect the date of data collection, which is not always consistent with the date that the change occurred.		
	Potential impact: Low		
	Actual impact: Low		
From: 01-Jun-20	Audit history: None		
To: 30-Jun-20	Controls: Weak		
	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls over the database are rated as moderate. Most of the field audit accuracy issues related to one light location, and a small number of database accuracy issues were identified. The controls over submission are weak. Trustpower's DUML calculations operate correctly, but incorrect inputs into the calculation resulted in incorrect submission for the three of the six ICPs for June 2020. The audit risk rating is low based on the volume differences identified.		
Actions taken to resolve the issue Completion Remedial action date		Remedial action status	
We have updated the data, as per the EA standardised wattage table, for the three ICPs mentioned above and are working with the Contractor to look at accurately determining the Ballast of the lamps. This was the reply from the contractor. "the standard for Fluorescent lamps that you are referring to, is based on Magnetic Ballast which indicate an operating wattage of between 8-10 Watts, this is based on several variables with include supply voltage assuming 240V, lamp efficiency, Ballast efficiency therefore to assume 9 watts is a fair deal.		28/08/2020	Identified

However Magnetic ballast are no longer used. The fluorescent lighting in use today uses Electronic Ballasts which are more efficient, with more efficient tubes therefore the operating watts can be calculated much lower, link attached." https://www.xcelenergy.com/staticfiles/xe/Marketing/MN-Bus-Lighting-Input-Wattage-Guide.pdf	
Preventative actions taken to ensure no further issues will occur	Completion date

ICP identifier and items of load				
Non-compliance	Description			
Audit Ref: 2.2 With: Clause 11(2)(a)	Pole ID 2117 had a blank ICP group, and was updated to ICP 0008807442WME14 during the audit.			
and (aa) of Schedule	Potential impact: Low			
15.3	Actual impact: Unknown			
	Audit history: None			
From: 10-Jul-20	Controls: Moderate			
To: 14-Aug-20	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as moderate, because almost all lights are assigned to a settled ICP.			
	The impact is assessed to be low. Light ID 2117 is 50.5W or 215.7 kWh p.a., and the ICP number was corrected during the audit.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Resolved during the Audit		28/08/2020	Cleared	
Preventative actions taken to ensure no further issues will occur		Completion date		
No Action required		28/08/2020		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c)	Pole ID 1998 had a blank gear wattage and gear wattage description, when "no gear" and zero is expected.		
and (d) of Schedule	Potential impact: Low		
15.3	Actual impact: Low		
	Audit history: None		
From: 10-Jul-20	Controls: Strong		
To: 10-Jul-20	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong. Almost all lights had gear model and wattage recorded.		
	There is no impact, the missing gear wattage was expected to be zero.		
Actions taken to resolve the issue		Completion date	Remedial action status
Have asked Contractor to update blank with Zero		28/08/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No Action required		28/08/2020	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	The database is not confirmed as accurate with a 95% level of confidence.		
With: Clause 15.2 and 15.37B(b)	Pole ID 1998 had a blank gear wattage and gear wattage description, when "no gear" and zero is expected.		
	Pole ID 2117 had a blank ICP group, and was updated to ICP 0008807442WME14 during the audit.		
	The installation and change dates recorded in the database reflect the date of data collection, which is not always consistent with the date that the change occurred.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: None		
From: 01-Jul-20	Controls: Moderate		
To: 17-Jul-20	Breach risk rating: 2		

Audit risk rating	Rationale for audit risk rating		
Low	The controls over the database are rated as moderate. Most of the field audit accuracy issues related to one light location, and a small number of database accuracy issues were identified.		
	The audit risk rating is low based on the volume differences identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Database has been updated		28/08/2020	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No Action required		28/08/2020	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2	The database is not confirmed as accurate with a 95% level of confidence.		
With: Clause 15.2 and 15.37B(c)	The wattages supplied by Alf Downs were not applied for ICPs 0001111171WM17A, 0001111172WMDBA and 0008807442WME14 for June 2020, resulting in over submission of 135 kWh.		
	Pole ID 1998 had a blank gear wattage and gear wattage description, when "no gear" and zero is expected.		
	Pole ID 2117 had a blank ICP group, and was updated to ICP 0008807442WME14 during the audit.		
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.		
	The installation and change dates recorded in the database reflect the date of data collection, which is not always consistent with the date that the change occurred.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: None		
From: 01-Jun-20	Controls: Weak		
To: 30-Jun-20	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls over the database are rated as moderate. Most of the field audit accuracy issues related to one light location, and a small number of database accuracy issues were identified.		
	The controls over submission are weak. Trustpower's DUML calculations operate correctly, but incorrect inputs into the calculation resulted in incorrect submission for the three of the six ICPs for June 2020.		
	The audit risk rating is low based on the volume differences identified.		

Actions taken to resolve the issue	Completion date	Remedial action status
We have updated the data, as per the EA standardised wattage table, for the three ICPs mentioned above and are working with the Contractor to look at accurately determining the Ballast of the lamps This was the reply from the contractor . "the standard for Fluorescent lamps that you are referring to, is based on Magnetic Ballast which indicate an operating wattage of between 8-10 Watts, this is based on several variables with include supply voltage assuming 240V, lamp efficiency, Ballast efficiency therefore to assume 9 watts is a fair deal.	28/08/2020	Identified
However Magnetic ballast are no longer used. The fluorescent lighting in use today uses Electronic Ballasts which are more efficient, with more efficient tubes therefore the operating watts can be calculated much lower, link attached."		
https://www.xcelenergy.com/staticfiles/xe/Marketing/MN-Bus- Lighting-Input-Wattage-Guide.pdf"		
Preventative actions taken to ensure no further issues will occur	Completion date	
The discrepancy is around defining the correct Ballast and we are discussing this with the Contractor to ensure us and them are in agreement	0/10/2020	