Compliance plan for Dunedin CC – 2020

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 Clause 11(1) of Schedule 15.3	Submitted values do not match the database values resulting in an estimated under submission of 41,957.40 kWh per annum. 49 items of load have incorrect gear wattages recorded. Potential impact: Medium		
From: 04-May-19	Actual impact: Medium		
To: 03-Nov-20	Audit history: Three		
	Controls: Moderate		
	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate, because they are sufficient to ensure that the database is accurate most of the time. The impact is assessed to be medium, based on potential submission errors detailed above.		
Actions taken to resolve the issue		Completion date	Remedial action status
A list will be provided to Dunedin City Council to update their RAMM database.		28/2/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Quarterly reviews of the asset schedules provided will be completed to proactively manage the data set		Ongoing	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	One light not recorded in the database.		
With: Clause 11(2A) of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: Twice		
From: 04-May-19	Controls: Strong		
To: 03-Nov-20	Breach risk rating:1		
Audit risk rating	Rationale for audit risk rating		

Low	The controls are rated as strong, as the processes in place ensure the database accuracy is high overall.		
	The impact is assessed to be low, based on 25W missing from the database.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact will work with Dunedin City Council to ensure the light is added to the RAMM database and provided monthly with the asset schedule.		31/1/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Audit trail			
Non-compliance	Description		
Audit Ref: 2.7 With: Clause 11(4) of	Festive lights are recorded in an Excel spreadsheet, which does not have an audit trail.		
Schedule 15.3	Potential impact: Low		
From: 04-May-19	Actual impact: Low		
To: 03-Nov-20	Audit history: Once		
	Controls: Weak		
	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak, because a compliant audit trail does not exist for festive lights.		
	The impact is assessed to be low, because changes typically occur only once each year and can be identified by comparing the database versions.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact Energy will discuss this non-compliance and work with DCC to ensure there is an audit trail on this spreadsheet moving forward.		31/5/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	49 items of load have incorrect gear wattages recorded.		
With: Clause 15.2 and	Potential impact: Low		
15.37B(b)	Actual impact: Low		
	Audit history: Three times previously		
From: 04-May-19	Controls: Strong		
To: 03-Nov-20	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as strong as the processes in place are sufficient to ensure that the database is accurate most of the time. The impact is assessed to be low as overall the database has high level of accuracy.		
Actions taken to resolve the issue		Completion date	Remedial action status
A list will be provided to Dunedin City Council to update their RAMM database.		28/2/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Quarterly reviews of the asset schedules provided will be completed to proactively manage the data set		Ongoing	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 Clause 15.2 and 15.37B(c)	Submitted values do not match the database values resulting in an estimated under submission of 41,957.40 kWh per annum. 49 items of load have incorrect gear wattages recorded. Potential impact: Medium Actual impact: Medium Audit history: Three times previously		
From: 04-May-19	Controls: Moderate		
To: 03-Nov-20	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate, because they are sufficient to ensure that the database is accurate most of the time. The impact is assessed to be medium, based on potential submission errors detailed above.		

Actions taken to resolve the issue	Completion date	Remedial action status
Missing Lights: Contact will work with Dunedin City Council to understand how different data sets have been provided. Wash-ups will be created to ensure historic billing is accurate.	31/3/2021	Identified
Incorrect gear wattages: A list will be provided to Dunedin City Council to update their RAMM database.	28/2/2021	