Compliance plan for Hutt CC DUML – 2021

Participant to give access			
Non-compliance	Description		
Audit Ref: 1.11 With: Clause 16A.4	Submission information not provided within 15 business days of being requested.		
	Potential impact: Low Actual impact: Low		
From: 11-Jan-21	Audit history: None Controls: Weak		
To: 07-Apr-21			
P	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as the provision of information is slow and requires multiple requests.		
	The audit risk rating is low as the information was eventually provided.		
Actions taken to resolve the issue		Completion date	Remedial action status
Submission information was provided		7/4/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of	Festive lights not submitted when connected resulting in an estimated minor under submission of 939 kWh for the month of December.		
Schedule 15.3	The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 827,200 kWh as recorded in section 3.1.		
	LED make and model details are not recorded in the database.		
	Lamp wattage is recorded outside of the database.		
	Four items of load do not have an ICP number recorded in the database resulting in an estimated under submission of 2,870 kWh.		
	16 items of load with no lamp type resulting in an estimated annual under submission of 4,169 kWh.		
	11 items of load have inaccurate wattages recorded resulting in an estimated annual under submission of 546 kWh.		
	46 items of load recorded with "Property Plus" in the ICP column not reconciled resulting in an estimated under submission of 11,472 kWh per annum.		
	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 change dates may not reflect the date the change is made.		
	Potential impact: High		
5 04 0 1 00	Actual impact: High		
From: 01-Oct-20	Audit history: Twice		
To: 31-Dec-20	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.		
	The audit risk rating is high based on kWh variances discussed in section 3.1 .		

Actions taken to resolve the issue	Completion date	Remedial action status
The Council has committed to undertake two major projects to address the majority of these non-compliances:	1/11/2021	Identified
 A 100% field audit; Transitioning the streetlight records to a RAMM database with the results from the field audit (and any additional changes that occur during the field audit). 		
The RAMM database will ensure all information is captured in a single place and will have better controls and audit records. The Field Audit will ensure all required information about each light is captured and the database starts off with an accurate and complete dataset.		
Festive Lights will be added as a new record each year within the database when connected and end dated when disconnected.		
Contractors, Fulton Hogan, now have a 48 hour timeline with which to enter any changes in the field into the streetlight database.		
Property UrbanPlus are being engaged to have the lights allocated to their own ICP(s).		
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)	Four unmetered items of load do not have an ICP number assigned resulting in an estimated under submission of 2,870 kWh per annum.		
and (aa) of Schedule 15.3	46 items of load recorded with "Property Plus" in the ICP column not reconciresulting in an estimated under submission of 11,472 kWh per annum.		
	Potential impact: Medium		
	Actual impact: Medium		
	Audit history: Twice previously		
From: 01-Oct-20	Controls: Moderate		
To: 31-Dec-20	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls over the database are rated as moderate. Once the data is moved to RAMM I would expect the controls to move to strong.		
	The impact is assessed to be medium due to the volume of the unsubmitted kWh detailed above.		
Actions taken to resolve the issue		Completion date	Remedial action status
The four unmetered lights listed against NZTA will be moved off Hutt City Councils database and onto a respective NZTA ICP's database.		30/6/2021	Investigating
Property UrbanPlus are being engaged to have the lights allocated to their own ICP(s).			
Preventative actions to	aken to ensure no further issues will occur	Completion date	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	LED make and model details are not recorded in the database.		
With: Clause 11(2)(c)	Lamp wattage is recorded outside of the database.		
and (d) of Schedule 15.3	16 items of load with no lamp description recorded.		
	Potential impact: Unknown		
	Actual impact: Medium		
From: 01-Jan-20	Audit history: Three times previously		
To: 31-Dec-20	Controls: Weak		
	Breach risk rating: 6		
Audit risk rating	Rationale fo	r audit risk rating	
Medium	The controls are rated as weak as the database does not record the wattage, and there are no LED lamp makes and models recorded.		
	The impact is assessed to be medium as the database does not have LED make and model recorded and the field audit indicates that the data is not accurate.		
Actions taken to resolve the issue Completion Remedial action date		Remedial action status	
The Council has committed to undertake two major projects to address the majority of these non-compliances:		1/11/2021	Investigating
database with th	dit; e streetlight records to a RAMM ne results from the field audit (and hanges that occur during the field		
a single place and will ha The Field Audit will ensur	ensure all information is captured in ve better controls and audit records. re all required information about each database starts off with an accurate		
Preventative actions ta	aken to ensure no further issues will occur	Completion date	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	One additional light found in the field.		
With: Clause 11(2)(c) and (d) of Schedule 15.3	Potential impact: Low Actual impact: Low		
From: 01-Jan-20	Audit history: None		
To: 31-Dec-20	Controls: Weak		
10.31 800 20	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as process to track changes is not capturing all changes made in the field.		
	The impact is assessed to be low as there was only one additional lamp found of the sample checked.		
Actions taken to resolve the issue Completion date		Remedial action status	
The 100% Field Audit will ensure all lights are captured and recorded		1/11/2021	Identified
Preventative actions to	aken to ensure no further issues will occur	Completion date	

Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and	The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 827,200 kWh.	
15.37B(b)	LED make and model details are not recorded in the database.	
	Lamp wattage is recorded outside of the database.	
	Four items of load do not have an ICP number recorded in the database resulting in an estimated under submission of 2,870 kWh.	
	46 items of load recorded with "Property Plus" in the ICP column not reconciled resulting in an estimated under submission of 11,472 kWh per annum.	
	16 items of load with no lamp type resulting in an estimated annual under submission of 4,169 kWh.	
	11 items of load have inaccurate wattages recorded resulting in an estimated annual under submission of 546 kWh.	
	Livening dates are not recorded for new connections and change dates may not reflect the date the change is made.	
	Potential impact: High	
5 04 1 00	Actual impact: High	
From: 01-Jan-20	Audit history: Three times previously	
To: 31-Dec-20	Controls: Weak	
	Breach risk rating: 9	
Audit risk rating	Rationale for audit risk rating	
High	The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.	
	The audit risk rating is high based on kWh variances.	

Actions taken to resolve the issue	Completion date	Remedial action status
The Council has committed to undertake two major projects to address the majority of these non-compliances:	1/11/2021	Identified
 A 100% field audit; Transitioning the streetlight records to a RAMM database with the results from the field audit (and any additional changes that occur during the field audit). 		
The RAMM database will ensure all information is captured in a single place and will have better controls and audit records include dates for both the effective change and the date of the record changing.		
The Field Audit will ensure all required information about each light is captured and the database starts off with an accurate and complete dataset.		
Contractors, Fulton Hogan, now have a 48 hour timeline with which to enter any changes in the field into the streetlight database.		
Property UrbanPlus are being engaged to have the lights allocated to their own ICP(s).	30/6/2021	
Preventative actions taken to ensure no further issues will occur	Completion date	

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	Festive lights not submitted when connected resulting in an estimated minor under submission of 939 kWh for the month of December.		
	The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 827,200 kWh as recorded in section 3.1.		
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	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 change dates may not reflect the date the change is made.		
	Potential impact: High		
	Actual impact: Unknown		
From: 01-Oct-20	Audit history: Twice		
To: 31-Dec-20	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.		
	The audit risk rating is high based on kWh variances discussed in section 3.1 .		

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