

Compliance plan for NZTA Wairarapa for Contact Energy Limited 2020

Title: Deriving Submission Information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 27-Feb-20</p> <p>To: 27-Feb-20</p>	<p>Submissions are not calculated based on database information, and no database extracts are supplied to Contact.</p> <p>32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331) which is supplied by Genesis Energy.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate.</p> <p>The risk is medium based on the 20,354.3 kWh per annum difference between the database and registry information used for submission. The incorrect ICP numbers currently have no impact because the database information is not used for submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Contact will engage with PSW in order to facilitate a monthly report from the database to ensure our settlement information is based on the DUML database information.</p> <p>As part of this engagement we will also arrange for the 32 items of load with incorrect ICP / GXP references to be corrected.</p>	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 27-Feb-20 To: 27-Feb-20	The available audit trails do not specify: <ol style="list-style-type: none"> 1) the user who made the data change, and 2) the date and time of the data change. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong, because the user who made the change and the approximate date and time of the change can be determined from other information which is available. The impact is assessed to be low based on the nature and type of non-compliance, and because only one user is maintaining the database.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will investigate with PSW regarding whether the current DUML Database is able to be enhanced to include a suitable audit trail.	March 2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 27-Feb-20 To: 27-Feb-20	32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331). Potential impact: High Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. The ICP number missed being updated when the GXP was updated, creating a discrepancy. The impact is assessed to be low because the correct GXPs are recorded. There is no impact on submission because the database information is not used for submission.	

Actions taken to resolve the issue	Completion date	Remedial action status
Contact will engage with PSW in order to facilitate a monthly report from the database to ensure our settlement information is based on the DUMML database information. As part of this engagement we will also arrange for the 32 items of load with incorrect ICP / GXP references to be corrected.	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Title: Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 27-Feb-20 To: 27-Feb-20	Submissions are not calculated based on database information, and no database extracts are supplied to Contact. 32 items of load with Powerco GXP = TP Greytown had 0020909000WR49A (MST0331) recorded, but instead should have 0666002555PC35F (GYT0331) which is supplied by Genesis Energy. Potential impact: High Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as weak because the database information is not used for submission. The controls over database accuracy are rated as moderate. The risk is medium based on the 20,354.3 kWh per annum difference between the database and registry information used for submission. The incorrect ICP numbers currently have no impact because the database information is not used for submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will engage with PSW in order to facilitate a monthly report from the database to ensure our settlement information is based on the DUMML database information. As part of this engagement we will also arrange for the 32 items of load with incorrect ICP / GXP references to be corrected	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	