

Compliance Plan for NZTA Tasman DUML – 2020

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 17.295F of part 17 From: 01-Sep-20 To: 28-Sep-20	Audit not completed within the required timeframe. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, as Contact's failure to provide submission information caused the delay caused this report to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Tardiness was caused due to a change in staffing and roles during 2020; we do not expect this to continue being an issue	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
New team now in place to manage DUML compliance moving forward	Complete	

Participants to give access		
Non-compliance	Description	
Audit Ref: 1.11 Clause: 16A.4 From: 01-Sep-20 To: 28-Sep-20	Submission information not provided within 15 business days. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, as Contact's failure to provide submission information caused the delay caused this report to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Tardiness was caused due to a change in staffing and roles during 2020; we do not expect this to continue being an issue	Complete	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
New team now in place to manage DUML compliance moving forward	Complete	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 31-Aug-17</p> <p>To: 31-Oct-19</p>	<p>Over submission of 1,246.49kWh for June 2020 due to incorrect Trader kW figure from registry being used.</p> <p>Database is not confirmed as accurate with a 95% level of confidence.</p> <p>Incorrect wattages for 11 items of load resulting in an estimated minor under submission of 482.6kWh per annum.</p> <p>The registry data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time, but there is room for improvement.</p> <p>The audit risk rating is medium based on the estimated kWh volume impact of the database inaccuracy.</p>	
Actions taken to resolve the issue		Completion date
<p>Contact will work with NZTA and agents to improve the quality of data provided, including a transition to a daily tracking of assets.</p> <p>Pending above changes, Contact will update and tighten process in the interim to ensure we identify changes to the distributor UML as they occur and reflect this in the trader UML.</p>		<p>Ongoing</p> <p>31/1/2020</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We will request and review the database asset schedule quarterly to proactively manage the data set</p>		<p>Ongoing</p>
Remedial action status		
<p>Identified</p>		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c)&(d) of Schedule 15.3 From: 31-Aug-17 To: 15-Jul-20	One item of load with no light or wattage details populated. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as the processes in place ensure that this detail is captured, and there was only one light that had no wattage or light type recorded. The audit risk rating is recorded as low to none as there was only one light with no wattage recorded.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact will work with NZTA and agents to update the associated item of load		28/2/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will request and review the database asset schedule quarterly to proactively manage the data set		Ongoing	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 31-Aug-17 To: 15-Jul-20	Database is not confirmed as accurate with a 95% level of confidence. One item of load missing lamp description and wattage. Incorrect wattages for 11 items of load resulting in an estimated minor under submission of 482.6kWh per annum. Potential impact: High Actual impact: Medium Audit history: Twice Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time, but there is room for improvement. The audit risk rating indicates that the impact of database inaccuracy is medium based on the estimated kWh of over submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
Contact will work with NZTA and agents to update the associated item of load. Contact will work with NZTA and agents to correct the wattages of the incorrectly listed lights		28/2/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will request and review the database asset schedule quarterly to proactively manage the data set		Ongoing	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 31-Aug-17</p> <p>To: 15-Jul-20</p>	<p>Over submission of 1,246.49kWh for June 2020 due to incorrect Trader kW figure from registry being used.</p> <p>One item of load missing lamp description and wattage.</p> <p>Incorrect wattages for 11 items of load resulting in an estimated minor under submission of 482.6kWh per annum.</p> <p>Database is not confirmed as accurate with a 95% level of confidence as recorded in section 3.1.</p> <p>The registry data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time, but there is room for improvement.</p> <p>The audit risk rating is medium based on the estimated kWh volume impact of the database inaccuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Contact will work with NZTA and agents to update the associated item of load.</p> <p>Contact will work with NZTA and agents to correct the wattages of the incorrectly listed lights</p>		28/2/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Quarterly reviews of the asset schedules provided will be completed to proactively manage the data set</p>		Date	