

Compliance plan for Marlborough DC – 2020

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1 Clause 11(1) of Schedule 15.3</p> <p>From: 01-Nov-19 To: 30-Sep-20</p>	<p>Submitted values do not match the database values resulting in an estimated over submission of 1,104 kWh per annum.</p> <p>The monthly wattage report provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Low Actual impact: Low</p> <p>Audit history: Three times previously Controls: Weak Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code.</p> <p>The impact is assessed to be low based on the anticipated volumes associated with the non-compliances found.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>For ICP 0004450157ML277 where there was a recorded variance. if Genesis has not received the data prior to settlement date/time frames Genesis will forward estimate off previous data for the initial submission. Once the data is received the database revision is reviewed and any corrections made. Genesis believe that for the Dec-20 data the FSE was provided due to the above event happening and subsequently the revisions have lowered the volumes provided to the market. Genesis are currently reviewing their data reporting from the Distributor to include the change requirements.</p>		01/06/2021	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Reporting from the Distributor requires changes to ensure complete details are being provided to the trader enabling settlement to accurately be determined.</p>		01/06/2021	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Nov-19 To: 30-Sep-20	One additional item of load found in the field. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as Marlborough Lines have robust processes to ensure that changes are tracked, and this is reflected in the high level of accuracy found in the database. The impact is assessed to be low as the database was found to be within the allowable accuracy threshold as detailed in section 3.1 .	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis to request the asset to be added to the database	01/06/2021	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	

Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.6 Clause 11(3) of Schedule 15.3 From: 24-Oct-18 To: 30-Sep-20	Changes not tracked. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Reporting from the Distributor requires changes to ensure complete details are being provided to the trader enabling settlement to accurately be determined.	01/06/2021	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
Monitor the reporting once change tracking is established.	01/06/2021	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 Clause 11(4) of Schedule 15.3 From: 24-Oct-18 To: 30-Sep-20	Audit trail not visible. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will require development with the reporting party to provide all change information within the reporting period, not just a snapshot.	01/06/2021	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis will provide an exception report where new assets are present within the period to confirm if it's "new" or a "Replacement". Customer reporting has been implemented to identify the changes within period	01/06/2021	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2 Clause 15.2 and 15.37B(c)</p> <p>From: 01-Nov-19 To: 30-Sep-20</p>	<p>Submitted values do not match the database values resulting in an estimated over submission of 1,104 kWh per annum.</p> <p>The monthly wattage report provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak as whilst the processes for updating the database are robust it was not proven that the database is able to meet the requirements of the code.</p> <p>The impact is assessed to be low based on the anticipated volumes associated with the non-compliances found.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>For ICP 0004450157ML277 where there was a recorded variance. Genesis if not received the data prior to settlement date/time frames Genesis will forward estimate off previous data for the initial submission. Once the data is received the database revision is reviewed and any corrections made. Genesis believe that for the Dec-20 data the FSE was provided due to the above event happening and subsequently the revisions have lowered the volumes provided to the market. Genesis are currently reviewing their data reporting from the Distributor to include the change requirements.</p>		01/06/2021	Identified
Preventative actions taken to ensure no further issue will occur		Completion date	
<p>Reporting from the Distributor requires changes to ensure complete details are being provided to the trader enabling settlement to accurately be determined.</p>		01/06/2021	