

# Genesis NZTA Wairarapa DUML Compliance Plan 2021

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 17-Apr-20</p> <p>To: 13-May-21</p>	<p>Submissions are not calculated based on database information.</p> <p>Incorrect use of the CST profile for ICP 0666002555PC35F.</p> <p>The use of the registry figures for reconciliation does not track changes at a daily basis.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as weak because the database information is not used for submission.</p> <p>The risk is low as the registry figures used are closely aligned with the database figures.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with the third-party contractor and the NZTA to gain reporting completeness enabling accurate submissions. Genesis will be seeking a logger to mitigate the current compliance issue with the use of CST to meet the current guidelines.	01/07/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Genesis has been working with both NZTA and the contractor to facilitate better data reporting. Where the reporting previously has been from a spreadsheet, it has in more recent times been NZTA's work stream to include these assets in their RAMM database contracted to Fulton Hogan. Genesis Energy will be requesting the logger for the region to be supplied by EMS to try and mitigate this highlighted instance of non-compliance. Failing to do obtain the logger data, would mean there is no correct profile to be used as all other profiles available also misrepresent the hours the energy is consumed. This is potentially a floor that the duml regime has and it would mean to accurately settle volumes, all customers would then need a golden meter to determine their assets burn times and their own settlement profiles. The Logger also could potentially have a 30 min Margin of error due to its location. Completion date is unknown, however requesting the logger for the settlement use in 01/07/2021 and historical washups as required.</p>	Unknown	
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Audit Trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3  From: 17-Apr-20 To: 14-May-21	The available audit trails do not specify: <ol style="list-style-type: none"> <li>1) the user who made the data change, and</li> <li>2) the date and time of the data change.</li> </ol> Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	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
Genesis has requested the use of RAMM for the reporting of streetlighting assets monthly		01/06/2021
Preventative actions taken to ensure no further issues will occur		Completion date
It is Genesis expectation that once the reporting has been established from RAMM, that the RAMM database should be able to track the changes and the reporting to be supplied monthly enabling the calculation of energy volumes @ asset level for any given day.		01/07/2021
		Identified

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 17-Apr-20</p> <p>To: 13-May-21</p>	<p>Submissions are not calculated based on database information.</p> <p>Incorrect use of the CST profile for ICP 0666002555PC35F.</p> <p>The use of the registry figures for reconciliation does not track changes at a daily basis.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<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 low as the registry figures used are closely aligned with the database figures.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis continues to work with the third-party contractor and the NZTA to gain reporting completeness enabling accurate submissions. Genesis will be seeking a logger to mitigate the current compliance issue with the use of CST to meet the current guidelines. The monthly reporting from RAMM is to be established by the customer enabling completeness.</p>		01/07/2021
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis has been working with both NZTA and the contractor to facilitate better data reporting. Where the reporting previously has been from a spreadsheet, it has in more recent times been NZTA's work stream to include these assets in their RAMM database contracted to Fulton Hogan. Genesis will be requesting the logger for the region to be supplied by EMS to try and mitigate this highlighted instance of non-compliance. Failing to do obtain the logger data, would mean there is no correct profile to be used as all other profiles available also miss represents the hours the energy is consumed. This is potentially a floor that the dumI regime has and it would mean to accurately settle volumes, all customers would then need a golden meter to determine their assets burn times and their own settlement profiles. As the Logger also could potentially have a 30 min Margin of error due to its location.</p> <p>Completion date is unknown, however requesting the logger for the settlement use in 01/07/2021 and historical washups as required.</p>		unknown
Identified		

