## Compliance plan for NZTA Hawkes Bay and Genesis Energy – 2021

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1 With: Clause 11(1) of	Under submission occurred by 1,646 kWh for December 2020 due to incorrect data.			
Schedule 15.3	The current monthly report does not include asset removal dates, so if a light is removed during the month, it does not appear for the entire month.			
	Potential impact: Low			
From: 01-May-20	Actual impact: Low			
To: 08-Feb-21	Audit history: None			
	Controls: Moderate			
	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as moderate because whilst the deleted lamps were identified, they were not notified to Genesis. Controls are rated as moderate strong with regard to the processing by Genesis.			
	The impact on settlement and participating is low.	erefore, the audit risk		
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has made the adjustments to include the extra lamps not notified to Genesis, which will ensure the volume is accounted for in the Dec-20 revision.		22/02/2021	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis has implemented asset count reporting to monitor streetlighting total assets		01/03/2021		

All load recorded in database				
Non-compliance	Description			
Audit Ref: 2.5	Three additional items of load identified by the field audit.			
With: Clause 11(2A) of Schedule 15.3	Potential impact: Low			
Schedule 15.3	Actual impact: Low			
From 01 May 20	Audit history: None			
From: 01-May-20	Controls: Moderate			
To: 08-Feb-21	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has advised the NZTA of its additional field assets and NZTA are reviewing the database and will make the necessary adjustments.		01/03/2021	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis has notified the NZTA of the asset discrepancies. Genesis relies on the NZTA to accurately maintain its database.				

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and	56 items of load have the incorrect ballast applied.  Delays in updating the database for new connections.			
15.37B(b)	23 items of load missing from the database for December 2020 due to a centreline being deleted.			
	43 errors identified by the field audit.			
	Potential impact: Medium			
From: 01-May-20	Actual impact: Low			
To: 08-Feb-21	Audit history: None			
	Controls: Weak			
	Breach risk rating: 3			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as weak because many of these discrepancies were present during previous audits when this load was included in Council databases.			
	The impact on settlement and participants is minor; therefore, the audit risk rating is low.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has been advised that the asset gear wattage anomalies have been corrected, Genesis will review the report once received early March for Feb-2021 processing. Genesis will also review to ensure the deleted assets have been reinstated.		22/02/2021	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis review the data set prior to settlement procedures and advises the NZTA of the asset's discrepancies. Asset count reporting has been implemented to monitor monthly asset movement.		22/02/2021		

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(b)	Under submission occurred by 1,646 kWh for December 2020 due to incorrect data.  The current monthly report does not include asset removal dates, so if a light is removed during the month, it does not appear for the entire month.			
From: 01-May-20 To: 08-Feb-21	Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as moderate because whilst the deleted lamps were identified, they were not notified to Genesis. Controls are rated as moderate to strong with regard to the processing by Genesis.  The impact on settlement and participants is minor; therefore, the audit risk rating is low.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis reviews the asset reporting provided and adjusts as required and notifies the NZTA of any corrective actions within their database.			Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis has communicated to the NZTA the tracking of change requirements. As Genesis has not been able to ascertain whether there has been any upgrades or removals as there is no light/lamp removal date within the reporting to Genesis. Genesis has requested to be notified of new/removed assets in accordance of the DUML regime requirements.		19/02/2021		