

Compliance plan for Nelson CC DUML– 2021]

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Mar-20 To: 19-Jan-21</p>	<p>Estimated over submission of 4,699 kWh for ICP 0000200190CTC63 for the month of December 2020 due to no monthly report being received.</p> <p>The database accuracy is assessed to be 97.9% of the database for the sample checked indicating a potential over submission of approximately 26,700 kWh per annum.</p> <p>Nine items of load have zero wattage with an estimated annual under submission of 2,690 kWh.</p> <p>52 items of load with the incorrect ballast applied resulting in an estimated annual under submission of 3,357 kWh.</p> <p>112 lights are being submitted twice resulting in an estimated over submission of 85,997 kWh per annum.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High Actual impact: High Audit history: Twice previously Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated overall as moderate as Genesis have robust controls in place in relation to submission, but the assessment of the database indicates that the controls in place to provide an accurate database are weak for the NZTA and private lights.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis Energy are in the process of confirming the alleged over estimation for the 112 NZTA assets, however also believe this to be the case and has inherited the issue from the previous trader. Genesis will be requesting the NZTA assets ICP be corrected.</p> <p>Genesis has been working with the council to define the monthly reporting requirements and provide exception reporting back to the council if any.</p>	01/06/2021	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
Genesis has requested the council to discuss better report to the trader to ensure all assets are provided along with changes. Genesis will continue to review these monthly reports	01/06/2021

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 01-Mar-20 To: 19-Jan-21	One item of load does not have an ICP recorded. 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 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 requested the asset details be updated.	01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has requested the council to discuss better report to the trader to ensure all assets are provided along with changes. Genesis will continue to review these monthly reports	01/06/2021	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-Mar-20 To: 19-Jan-21	Nine items of load have zero wattage with an estimated annual under submission of 2,690 kWh. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate because they mitigate risk to an acceptable level. The impact is assessed to be low, based on the unknown wattage details above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Request asset details to be updated	01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continue to work with NCC and Contactor for data provisions enabling exception reporting.	01/06/2021	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Mar-20 To: 19-Jan-21</p>	<p>The database accuracy is assessed to be 97.9% of the database for the sample checked indicating a potential over submission of approximately 26,700 kWh per annum.</p> <p>Nine items of load have zero wattage with an estimated annual under submission of 2,690 kWh.</p> <p>52 items of load with the incorrect ballast applied resulting in an estimated annual under submission of 3,357 kWh.</p> <p>112 lights are being submitted twice resulting in an estimated over submission of 85,997 kWh per annum.</p> <p>Potential impact: High Actual impact: High Audit history: Three times previously Controls: Moderate Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate overall, because they are sufficient to ensure that database wattage is accurate for the bulk of lights which belong to NCC council lights but the controls for the accuracy of the NZTA and private lights are weak.</p> <p>The impact is assessed to be high, because over submission may be occurring of approx. 27,700 kWh per annum based on the database accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will be requesting the asset details be corrected to depict ownerships and correct asset details.		01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will request the NZTA asset ICP be updated and continue to review the data provided by the Council.		01/06/2021	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Mar-20</p> <p>To: 19-Jan-21</p>	<p>Estimated over submission of 4,699 kWh for ICP 0000200190CTC63 for the month of December 2020 due to no monthly report being received.</p> <p>The database accuracy is assessed to be 97.9% of the database for the sample checked indicating a potential over submission of approximately 26,700 kWh per annum.</p> <p>Nine items of load have zero wattage with an estimated annual under submission of 2,690 kWh.</p> <p>52 items of load with the incorrect ballast applied resulting in an estimated annual under submission of 3,357 kWh.</p> <p>112 lights are being submitted twice resulting in an estimated over submission of 85,997 kWh per annum.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated overall as moderate as Genesis have robust controls in place in relation to submission, but the assessment of the database indicates that the controls in place to provide an accurate database are weak for the NZTA and private lights.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>		
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<p>Genesis Energy are in the process of confirming the alleged over estimation for the 112 NZTA assets, however also believe this to be the case and has inherited the issue from the previous trader. Genesis will be requesting the NZTA assets ICP be corrected.</p> <p>Genesis has been working with the council to define the monthly reporting requirements and provide exception reporting back to the council if any.</p>		01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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