

Compliance plan for South Taranaki DC DUML – 2021

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A(1)(b) of Part 16A & 17.295F From: 01-Dec-20 To: 12-May-21	Audit not completed within the required timeframe. 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 Genesis are reliant on the database provider to supply the data and in this case their 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
Genesis has engaged with the customer to reiterate the importance of the data delivery and the expected delivery timeframes.	01/06/2021	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continue to send reminders to all customers prior to month end.		

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 12-May-21</p>	<p>Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 8,700 kWh higher than the DUML database indicates.</p> <p>537 items of load do not have a gear wattage recorded in the database. Adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission.</p> <p>The data used for submission 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: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<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 impact is assessed to be low due to the kWh volumes.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis provided feedback to the customer in relation to missing gear wattage values. The reporting from the customer in June for May 2021 has complete Gear wattage values.	01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to provide exception management reporting to the customer.	01/06/2021	

ICP identifier and items of load			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2) (a) & (aa) of Schedule 15.3</p> <p>From: 19-Feb-21</p> <p>To: 12-May-21</p>	<p>Two lights with no ICP resulting in an estimated under submission of 1,571.73 kWh per annum.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<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 impact is assessed to be low based on the estimated impact on reconciliation.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis provided feedback to the customer in relation to missing ICP values. The reporting from the customer in June for May 2021 has an ICP reported against each asset.</p> <p>In the event there is a repeat of this issue, it is Genesis's process to adopt the ICP based on the street for allocation purposes.</p>		01/06/2021	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis continues to provide exception management reporting to the customer.</p>		01/06/2021	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 12-May-21</p>	<p>537 items of load do not have a gear wattage recorded in the database. Adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate. Although gear wattages are maintained in a separate table and applied prior to sending the database extract to Genesis, they are not recorded in the database itself.</p> <p>There is no impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The customers reporting has been amended to accurately define the gear wattages associated with each asset. I do not believe the customer plans on changing its current process. However, Genesis will discuss whether there is a possibility to help them improve their process to mitigate any further risk.	01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The reporting provides the correct gear wattages, Genesis has confirmed all gear wattages to be accurate in their May 2021 reporting.		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 12-May-21	Seven LED lamps not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, because seven missing lamps were identified for the sample of 243 lamps checked. The impact is assessed to be low, based on 168W missing from the database.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has noted that only 1 of the 3 roads have had the assets added into the database. Genesis has requested the remaining 3 assets be confirmed and added to the database.	01/07/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: unknown To: 12-May-21	Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 8,700 kWh higher than the DUMML database indicates. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be low, based on the kWh difference described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis can confirm the model descriptions have been updated and that Genesis has requested the customer to confirm the last 3 missing assets and add as required.	01/07/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 12-May-21</p>	<p>Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 8,700 kWh higher than the DUML database indicates.</p> <p>537 items of load do not have a gear wattage recorded in the database. Adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission.</p> <p>The data used for submission 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: Twice</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<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 impact is assessed to be low, based on the kWh difference described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The customers reporting has been amended to accurately define the gear wattages associated with each asset. I do not believe the customer plans on changing its current process. However, Genesis will discuss whether there is a possibility to help them improve their process to mitigate any further risk.	01/06/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The reporting provides the correct gear wattages, Genesis has confirmed all gear wattages to be accurate in their May 2021 reporting. Genesis also carries out their own validation and if incorrect, the wattages are corrected prior to billing/settlement processes commencing. Genesis are currently discussing the reporting requiring for change tracking with the customer.		