

Compliance plan for Wellington 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: 26-Feb-21</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> • 9,400 kWh per annum under submission from field audit. • 33,866 per annum under submission due to incorrect lamp or gear wattages • 3,203 kWh per annum under submission due to missing lamp or gear wattages • 5,749 kWh per annum under submission due to static dimming applied to incorrect lamp types. • The wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,520kWh annually. • 65 Christmas lights do not have ICP numbers recorded. <p>Potential impact: High Actual impact: High Audit history: Twice Controls: Weak Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database.</p>	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis continues to review the data and are looking at how to manually correct the dimming percentage to ensure the volume calculation is accurate. Genesis raises any exception with the council where identified.</p> <p>Genesis will be reviewing the profile CST on the 4 hour assets and will be requesting assets data to assist with a profile application</p>	01/03/2020	

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: unknown To: 26-Feb-21	ICP number is not recorded for 65 Christmas lights. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong as the bulk of the lights have an ICP assigned and are recorded against the correct ICP. The impact is low/ none as this volume has now been submitted and the number of lights potentially assigned to the incorrect ICP are minor.	
Actions taken to resolve the issue		Completion date
Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database.		unknown
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis continues to review the data and raises any exceptions with the council where identified.		01/03/2020
Investigating		

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clauses 11(2)(c) and (d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 26-Feb-21</p>	<p>Some description and capacity information is incomplete or unknown, including:</p> <ul style="list-style-type: none"> • 135 lamps with unknown or blank lamp descriptions, • 15 items of load with zero wattage recorded, and • 14 blank gear wattages. <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 ensure that almost all items of load have wattage and description information recorded.</p> <p>The impact is estimated to be low, based on the information available.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database.		unknown	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to review the data and raises any exceptions with the council where identified.		01/03/2020	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11(2A) of Schedule 15.3 From: 01-Mar-20 To: 26-Feb-21	Nine additional items of load found in the field audit. Potential impact: Low Actual impact: Low Audit history: Once 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 ensure that the majority of items of load are recorded in the database. The impact is estimated to be low, based on the information available.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database.	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to review the data and raises any exceptions with the council where identified.	01/03/2020	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown To: 26-Feb-21</p>	<p>The database accuracy is assessed to be 100.2% of the database for the sample checked indicating a potential under submission of approximately 9,400 kWh per annum.</p> <p>391 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer's specifications available. The impact of these differences is estimated to be approximately 33,866 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>15 items of load have incorrect wattages, leading to under submission by 3,203 kWh per annum.</p> <p>Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low.</p> <p>Static dimming was not correctly applied for 310 statically dimmed lamps. The impact is expected to be at least approximately 5,749 kWh under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>The wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,520kWh annually.</p> <p>65 Christmas lights do not have ICP numbers recorded.</p> <p>Potential impact: High Actual impact: High Audit history: Twice Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak, because they are not sufficient to ensure that database wattage is consistently accurate. WCC intends to take action to resolve the issues.</p> <p>The impact is assessed to be high based on the wattage differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database.</p> <p>Genesis is unable to ascertain the "dynamic" dimming values therefore default to 100% of the lamps output, As Genesis is not notified and there is no current process/profiles that can handle such dimming.</p>	unknown	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to review the data and are looking at how to manually correct the dimming percentage to ensure the volume calculation is accurate. Genesis raises any exception with the council where identified.	01/03/2020	

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-Dec-18</p> <p>To: 29-Feb-20</p>	<p>The database used to prepare submissions contains some inaccurate information.</p> <ul style="list-style-type: none"> 9,400 kWh per annum under submission from field audit. 33,866 per annum under submission due to incorrect lamp or gear wattages 3,203 kWh per annum under submission due to missing lamp or gear wattages 5,749 kWh per annum under submission due to static dimming applied to incorrect lamp types. The wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,520kWh annually. 65 Christmas lights do not have ICP numbers recorded. <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Revised submission data will be provided to resolve the submission issues.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database.</p> <p>Genesis is unable to ascertain the “dynamic” dimming values therefore default to 100% of the lamps output, As Genesis is not notified and there is no current process/profiles that can handle such dimming.</p>		unknown
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis continues to review the data and are looking at how to manually correct the dimming percentage to ensure the volume calculation is accurate. Genesis raises any exception with the council where identified.</p>		01/03/2020
Remedial action status		
Investigating		