Compliance plan for Nulite DUML – 2020

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: 11(1) of Schedule 15.3	Under submission of 1,131 kWh due to the ICP 0825228433LCE38 being recorded as decommissioned on the registry and not subsequently submitted for R14 July & August 2019.		
1515	Database discrepancies found in the field resulting in an estimated annual under submission of 7,708.08 kWh.		
	Potential impact: Medium		
	Actual impact: Medium		
	Audit history: Multiple		
From: 01-Jun-17	Controls: Moderate		
To: 29-Sep-20	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as moderate as there have been improvements in the management of the database since the last audit.		
	The impact is assessed to be low, based on the kWh differences detailed in section 3.1.		
Actions taken to resolve the issue		Completion date	Remedial action status
The status for ICP 082522	28433LCE38 has been corrected.	Jan20	Identified
We have provided the customer with the audit findings and will be liaising closely with them to ensure database discrepancies are corrected accordingly.			
Preventative actions taken to ensure no further issues will occur		Completion date	
The status change for ICP 0825228433LCE38 was due to human error. We will be looking into how this can be prevented from occurring again and what reporting can be used to identify these errors quickly to prevent incorrect submission.		Ongoing	
Mercury has been working very closely with the customer to ensure the database is accurate and compliant. We will continue our regular contact with the customer to ensure any database changes are completed timely and accurately.			

Location of each item of load				
Non-compliance	Description			
Audit Ref: 2.3	One item of load with insufficient details to locate it.			
With: Clause 11(2)(b)	Potential impact: Low			
of Schedule 15.3	Actual impact: Low			
_	Audit history: None			
From: 03-Feb-20	Controls: Strong			
To: 29-Sep-20	Breach risk rating: 1			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as moderate as location details are recorded correctly for all but one item of load.			
	The impact is assessed to be low as only one item of load is affected.			
Actions taken to resolve the issue		Completion date	Remedial action status	
We have been in contact with the customer to confirm the details of this light. We are currently working to update the database accordingly.		Jan20	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Mercury has been working very closely with the customer to ensure the database is accurate and compliant. We will continue our regular contact with the customer to ensure any database changes are completed timely and accurately.		Ongoing		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3	Incomplete lamp descriptions recorded and no ballast wattage, only a total wattage is recorded. Potential impact: Low		
	Actual impact: Unknown		
From: 01-Jun-17	Audit history: Twice		
To: 29-Sep-20	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as moderate as this information has been requested from the customer but has not been provided as yet.		
	The impact is assessed to be low as the volume of lights associated with this database are small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Mercury will liaise with the customer to obtain all available details to update the database.		Jan20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury has been working very closely with the customer to ensure the database is accurate and compliant. We will continue our regular contact with the customer to ensure any database changes are completed timely and accurately.		Ongoing	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	five additional lights found in the field.		
With: 11(2A) of	Potential impact: Medium		
Schedule 15.3	Actual impact: Medium		
	Audit history: Multiple times		
From: 01-Jun-17	Controls: Moderate		
To: 29-Sep-20	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls in place are rated as moderate as there have been improvements in the management of the database since the last audit.		
	The impact is assessed to be low, based on the kWh differences detailed in section 3.1.		
Actions taken to resolve the issue		Completion date	Remedial action status
Mercury has contacted the customer to obtain all details of the additional lights. We are currently working to ensure the database is updated completely.		Jan20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury has been working very closely with the customer to ensure the database is accurate and compliant. We will continue our regular contact with the customer to ensure any database changes are completed timely and accurately.		Ongoing	

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: 15.2 and	The field audit found five additional lights resulting in an estimated under submission of 7,708.08 kWh kWh per annum.			
15.37B(b)	One item of load with insufficient deta	etails to locate it.		
	Incomplete lamp descriptions recorded and no ballast wattage, only a total wattage is recorded.			
	Potential impact: Medium			
From: 01-Jun-17	Actual impact: Medium			
To: 29-Sep-20	Audit history: Multiple times			
. с. 25 сер 20	Controls: Moderate			
	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls in place are rated as moderate as there have been improvements in the management of the database since the last audit.			
	The impact is assessed to be low, based on the kWh differences identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Mercury will obtain from the customer all details of the additional lights, the insufficient location details and the lamp descriptions. We are currently working to ensure the database is updated completely.		Jan20	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Mercury has been working very closely with the customer to ensure the database is accurate and compliant. We will continue our regular contact with the customer to ensure any database changes are completed timely and accurately.		Ongoing		

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: 15.2 and 15.37B(c)	Under submission of 1,131 kWh due to the ICP 0825228433LCE38 being recorded as decommissioned on the registry and not subsequently submitted for R14 July & August 2019.		
15.575(0)	Database discrepancies found in the field resulting in an estimated annual under submission of 7,708.08 kWh.		
	Potential impact: Medium		
From: 01-Jun-17	Actual impact: Medium		
To: 29-Sep-20	Audit history: Multiple times		
	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale fo	r audit risk rating	
Low	The controls in place are rated as moderate as there have been improvements in the management of the database since the last audit.		
	The impact is assessed to be low, based on the kWh differences detailed in section 3.1.		
Actions taken to resolve the issue		Completion date	Remedial action status
The status for ICP 082522	28433LCE38 has been corrected.	Jan20	Identified
We have provided the customer with the audit findings and will be liaising closely with them to ensure database discrepancies are corrected accordingly.		341120	To the state of th
Preventative actions taken to ensure no further issues will occur		Completion date	
The status change for ICP 0825228433LCE38 was due to human error. We will be looking into how this can be prevented from occurring again and what reporting can be used to identify these errors quickly to prevent incorrect submission.		Ongoing	
Mercury has been working very closely with the customer to ensure the database is accurate and compliant. We will continue our regular contact with the customer to ensure any database changes are completed timely and accurately.			