

## Compliance plan for Selwyn DC – December 2020

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: 05-Feb-20</p>	<p>The database contains some inaccurate data.</p> <p>The database accuracy is assessed to be 91.5% indicating an estimated over submission of 202,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>69 lamps have incorrect total wattages, resulting in estimated over submission of 110W or 470 kWh p.a. based on 4,271 burn hours.</p> <p>Submissions are calculated based on a snapshot at the end of the month.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences. A small number of incorrect lamp wattages were identified.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.</p>	
Actions taken to resolve the issue		Completion date
Mercury will liaise with the customer to update the database to ensure accurate submission. We will review our internal processes to comply with the EA memo.		July 20
Preventative actions taken to ensure no further issues will occur		Completion date
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20
We will review our internal processes to comply with the EA memo.		
Identified		

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 02-Feb-20	One item of load was missing from the database. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are rated as moderate. Almost all the differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. The impact is assessed to be low. One 20W light was missing from the database and estimated under submission is 85.4 kWh p.a. based on 4,271 annual burn hours.		
Actions taken to resolve the issue		Completion date	Remedial action status
Mercury will liaise with the customer to have the database updated accordingly.		July 20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20	

Database Accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 05-Feb-20</p>	<p>The database contains some inaccurate data.</p> <p>The database accuracy is assessed to be 91.5% indicating an estimated over submission of 202,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>69 lamps have incorrect total wattages, resulting in estimated over submission of 110W or 470 kWh p.a. based on 4,271 burn hours.</p> <p>Some addresses and GPS coordinates do not reflect the physical location of the item of load, particularly where the light is installed beyond the customer's boundary.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<b>High</b>	<p>Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences. A small number of incorrect lamp wattages were identified.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Mercury will liaise with the customer to update the database to ensure accurate submission.		July 20	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20	

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<b>Volume information accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 05-Feb-20</p>	<p>The database contains some inaccurate data.</p> <p>The database accuracy is assessed to be 91.5% indicating an estimated over submission of 202,000 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>69 lamps have incorrect total wattages, resulting in estimated over submission of 110W or 470 kWh p.a. based on 4,271 burn hours.</p> <p>Submissions are calculated based on a snapshot at the end of the month.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>High</b>	<p>Controls are rated as moderate. Almost all the field audit differences relate to LED upgrades, where there is sometimes a delay between the light being installed and paperwork being received to update the database. A relatively small number of lights are affected by the wattage differences. A small number of incorrect lamp wattages were identified.</p> <p>The impact is assessed to be high, based on the kWh differences described above. Orion intends to investigate and correct the differences identified.</p>	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
Mercury will liaise with the customer to update the database to ensure accurate submission. We will review our internal processes to comply with the EA memo.		July 20
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
Mercury will liaise with the customer to ensure timely and accurate database updates to allow for correct submission.		July 20
We will review our internal processes to comply with the EA memo.		
<b>Remedial action status</b>		
Identified		