

Compliance plan for Greater Wellington Regional Council– 2020

Distributed unmetered load audits			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 01-Jun-19 To: 08-Mar-20	Audit conducted late Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement is moderate due to under submission of approx. 13,700 kWh per annum		
Actions taken to resolve the issue		Completion date	Remedial action status
There was confusion and ongoing discussion between councils regarding responsibility of assets related to this ICP which delayed the audit. The audit was undertaken once this was clarified.		March 2020	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Mar-19 To: 08-Mar-20	Under submission of approx. 13,700 kWh per annum. Potential impact: Medium Actual impact: Medium Audit history: None Controls: None Breach risk rating: 8	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are not yet in place to ensure the accuracy of the database or submission information. The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Further work has been carried out to establish and record the correct light information in the DUML database for this ICP. Registry information and historic submissions have been revised using updated database lamp information and adding applicable gear wattage. Gear wattages have been added to the database.	16 June 2020 August 2020 November 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

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-19 To: 08-Mar-20	ICP identifier not in the database Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are not yet in place to ensure database accuracy. 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
We have requested that the ICP be added to the database.	Dec 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Mar-19 To: 08-Mar-20	Location information not sufficient to locate each item of load. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are not yet in place to ensure database accuracy. The impact on settlement and participants is minor; therefore the audit risk rating is low. The main impact is that the audit is difficult to conduct	
Actions taken to resolve the issue		Completion date
The inclusion of GPS co-ordinates in the database has been recommended to WRC.		Aug 2020
Preventative actions taken to ensure no further issues will occur		Completion date
Remedial action status		
Identified		

Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-Mar-19 To: 08-Mar-20	The database contains insufficient information to derive make and model for 25 items of load. Wattage details are not present. Potential impact: Medium Actual impact: Medium Audit history: None Controls: None Breach risk rating: 8	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are not yet in place to ensure database accuracy. The impact on settlement and participants is moderate; therefore the audit risk rating is medium. The main impact is that the audit is difficult to conduct	
Actions taken to resolve the issue	Completion date	Remedial action status
Lamp manufacturer and model and wattage are now included in the database for all items of load. Gear wattage is populated in the database	August 2020 Nov 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Mar-19 To: 08-Mar-20	14 items of load are missing from the database. Potential impact: Medium Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are not yet in place to ensure database accuracy. Under submission could be 6,800 kWh per annum assuming 114 watts per fitting.	
Actions taken to resolve the issue	Completion date	Remedial action status
Further work has been carried out to establish and record the correct light information in the DUML database for this ICP. Registry information and historic submissions have been revised using updated database lamp information and adding applicable gear wattage.	July 2020 August 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: 01-Mar-19 To: 08-Mar-20	Date information is insufficient to derive the load for any given day. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are not yet in place to ensure database accuracy. The lack of date information is likely to have a minor impact on settlement.	
Actions taken to resolve the issue	Completion date	Remedial action status
Further work has been carried out to establish and record the correct light information in the DUML database for this ICP including lamp installation dates. Registry information and historic submissions have been revised using updated database lamp information and adding applicable gear wattage.	July 2020 August 2020	Identified
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: 01-Mar-19 To: 08-Mar-20	The database has many gaps and is inaccurate. Potential impact: Medium Actual impact: Medium Audit history: None Controls: None Breach risk rating: 8	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are not yet in place to ensure database accuracy. The impact is assessed to be medium, based on the field audit findings.	
Actions taken to resolve the issue	Completion date	Remedial action status
Further work has been carried out to establish and record the correct light information in the DUML database for this ICP. Registry information and historic submissions have been revised using updated database lamp information and adding applicable gear wattage. Gear wattages have been added to the database.	16 June 2020 August 2020 November 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 01-Mar-19 To: 08-Mar-20	Under submission of approx. 13,700 kWh per annum. Potential impact: Medium Actual impact: Medium Audit history: None Controls: None Breach risk rating: 8	
Audit risk rating	Rationale for audit risk rating	
Medium	Controls are not yet in place to ensure the accuracy of the database or submission information. The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Further work has been carried out to establish and record the correct light information in the DUML database for this ICP. Registry information and historic submissions have been revised using updated database lamp information and adding applicable gear wattage. Gear wattages have been added to the database.	16 June 2020 August 2020 November 2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	