

## Compliance plan for Tauranga CC DUML – 2020

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 26-Nov-18 To: 23-Oct-20</p>	<p>Inaccurate submission due to the incorrect profile being applied for four ICPs and the incorrect burn hours being applied for five ICPs. This is estimated to have resulted in a total under submission of 4,649.86 kWh submission for the month of September 2020.</p> <p>Database accuracy is outside the allowable threshold and indicates a potential under submission of 214,500 kWh per annum due to new items of load are not being added to the database in a timely manner in all instances.</p> <p>One incorrect gear wattage applied of 18W instead of 14W.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak for two reasons. The incorrect profile and burn hours have been used for submission for four/five ICPs and the updates to the database are not being made in a timely manner.</p> <p>The impact is rated as high due to the estimated submission inaccuracies found.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The correct profiles have now been applied. The difference between profiles was minor. With regard to updates not been made in a timely manner. This is being actively worked on and the delays are of a short duration, therefore we believe the potential annual discrepancies is overinflated as it appears to be calculated as if they changes are never captured.	01/01/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Working with customer to ensure all changes are captured in a timely manner	On going	

<b>All load recorded in database</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 26-Nov-18 To: 23-Oct-20	45 x additional items of load found in the field which were not recorded in the database. Potential impact: High Actual impact: High Audit history: Three times Controls: Moderate Breach risk rating: 6	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>High</b>	The controls are rated as moderate as there is room for improvement for the adding of new load.  The impact is rated as high due to the estimated volume of under submission for new lights missing from the database.	
<b>Actions taken to resolve the issue</b>		<b>Completion date</b>
TCC is investigating all the discrepancies in the field Audit and will be updating the Database using the correct dates. All load will be submitted from the correct livening dates.		01/01/2021
<b>Preventative actions taken to ensure no further issues will occur</b>		<b>Completion date</b>
We have instigated a new process with Powerco the party responsible auditing the contractors who are livening the lights without the approval of us or the TCC. This should reduce the occurrence of such livening. The delay does not have a material impact on the submission as the lights are usually picked up within a few weeks of being livened and data submitted from the correct dates.		01/02/2021
		Identified

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 26-Nov-18</p> <p>To: 21-Oct-20</p>	<p>Database accuracy is outside the allowable threshold and indicates a potential under submission of 214,500 kWh per annum due to new items of load are not being added to the database in a timely manner in all instances.</p> <p>One incorrect gear wattage applied of 18.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple 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 as there is room for improvement to capture new streetlights in a more timely manner.</p> <p>The impact is rated as high due to the estimated volume of under submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have instigated a new process with Powerco the party responsible auditing the contractors who are livening the lights without the approval of us or the TCC. This should reduce the occurrence of such livening. The delay does not have a material impact on the submission as the lights are usually picked up within a few weeks of being livened and data submitted from the correct dates.	01/02/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have instigated a new process with Powerco the party responsible auditing the contractors who are livening the lights without the approval of us or the TCC. This should reduce the occurrence of such livening. The delay does not have a material impact on the submission as the lights are usually picked up within a few weeks of being livened and data submitted from the correct dates.	01/02/2021	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 26-Nov-18</p> <p>To: 23-Oct-20</p>	<p>Inaccurate submission due to the incorrect profile being applied for four ICPs and the incorrect burn hours being applied for five ICPs. This is estimated to have resulted in a total under submission of 4,649.86 kWh submission for the month of September 2020.</p> <p>Database accuracy is outside the allowable threshold and indicates a potential under submission of 214,500 kWh per annum due to new items of load are not being added to the database in a timely manner in all instances.</p> <p>One incorrect gear wattage applied of 18W instead of 14W.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>Controls are rated as weak for two reasons. The incorrect profile and burn hours have been used for submission for four/five ICPs and the updates to the database are not being made in a timely manner.</p> <p>The impact is rated as high due to the estimated submission inaccuracies found.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
The correct profiles have now been applied. The difference between profiles was minor	01/12/2020	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have included this profile in the same process as all our other Profiles to ensure it is part of our separate profile Audit.	01/01/2020	