

Compliance Plan NZTA Waimakariri DUML 2021

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 28-May-19 To: 28-Feb-21	Estimated 274,918.08 kWh of under submission since switching to the CTCS profile from October 2020 up to February 2021. Potential impact: High Actual impact: High Audit history: Once Controls: None Breach risk rating: 12	
Audit risk rating	Rationale for audit risk rating	
High	The controls were rated as none, because they were not sufficient to ensure that submission data is calculated accurately. The impact is assessed to be high due to the level of submission inaccuracy.	
Actions taken to resolve the issue		Completion date
Under submissions related to Simply Energy's systems for unmetered management were corrected straight after the Material change audit was completed in August 2021. Submission issues relating to poor database management continue to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network.		31/8/21 Unknown
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: 28-May-19 To: 01-Apr-21	Location information insufficient to locate at least 51 items of load. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak because there are still many lights without sufficient information to locate them. The impact is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Unfortunately, this issue continues to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network.		Unknown
Preventative actions taken to ensure no further issues will occur		Completion date
Investigating		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 28-May-19 To: 01-Apr-21	41 lights with no wattage recorded resulting in under submission of 28,047 kWh. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. 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
Unfortunately, this issue continues to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network. We will update our current and historic submissions to match the values found by Veritek in their audit process as this is likely to be more accurate than the values we have been using (*in lieu of regular files from NZTA)		Unknown	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 28-May-19</p> <p>To: 01-Apr-21</p>	<p>41 lights with no wattage recorded resulting in under submission of 28,047 kWh [based on burn 4271 burn hours].</p> <p>Ten lamps have ballast added where this is not required, resulting in a very minor estimated under submission of 40W or 171 kWh p.a. based on 4,271 burn hours.</p> <p>51 items of load with insufficient information to locate these.</p> <p>Load changes no longer tracked in the Mainpower database.</p> <p>Potential impact: High</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as none as this database is no longer being maintained.</p> <p>The impact is assessed to be low, based on the potential kWh variances detailed above but this will increase until an alternative database is found to manage this load .</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Unfortunately, these issue continues to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network. We will update our current and historic submissions to match the values found by Veritek in their audit process as this is likely to be more accurate than the values we have been using (*in lieu of regular files from NZTA)</p>		Unknown	Investigating
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: 28-May-19 To: 28-Feb-21	Estimated 274,918.08 kWh of under submission since switching to the CTCS profile from October 2020 up to February 2021. Potential impact: High Actual impact: High Audit history: Once Controls: None Breach risk rating: 12	
Audit risk rating	Rationale for audit risk rating	
High	The controls were rated as none, because they were not sufficient to ensure that submission data is calculated accurately. The impact is assessed to be high due to the level of submission inaccuracy.	
Actions taken to resolve the issue	Completion date	Remedial action status
Under submissions related to Simply Energy's systems for unmetered management were corrected straight after the Material change audit was completed in August 2021. Submission issues relating to poor database management continue to exist as no data has been submitted by NZTA since Mainpower ceased management of the lights in their network.	31/8/21 Unknown	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	