

Compliance plan for New Plymouth DC DUML - 2021

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Oct-20</p> <p>To: 04-Nov-21</p>	<p>The field audit found that in absolute terms, total annual consumption is estimated to be 20,800 kWh lower than the DUML database indicates.</p> <p>Three lights recorded against the incorrect NSP.</p> <p>Nine incorrect gear wattages.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be medium based on the potential over submission of 20,800 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>This finding in the field audit was the result of Powerco changing poles and removing lights without communicating with NPDC until after the work is done. As such, these lights continue to be reconciled until such time as Council is made aware of the change.</p> <p>Lights recorded against the incorrect ICP will be corrected.</p> <p>Incorrect gear wattages will be corrected.</p>	<p>N/a</p> <p>30/11/2021</p> <p>30/11/2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We will continue to work with Powerco to tighten this process and ensure that timely communication is received, preferably in advance of any decommission.</p> <p>NPDC and providers Power Solutions will work on developing a new report out of RAMM that provides a daily capacity value for the purpose of billing and submission.</p>	<p>Ongoing</p> <p>31/3/2022</p>	

Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 01-Sep-20</p> <p>To: 04-Nov-21</p>	<p>For the sample of lights checked, there were eight additional lights found in the field.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Low</p>	<p>Controls are rated as moderate, the process in place has sufficient controls to ensure that all items of load are recorded in the database most of the time, but improvements are required to the new connection processes.</p> <p>The audit risk rating is assessed to be low because the impact on submission is only 61 kWh per month.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We do not believe these lights are the responsibility of the Council and therefore should not be considered as part of this audit. As these lights are currently private lights we believe that they should be reconciled by the Developer and their retailer via a BTS or similar. Only when they are vested to Council, and become the responsibility of Council should they be considered within scope of this audit. Further to this, the livening of these assets was completed by Powerco and the developer and neither Contact nor NPDC were involved.</p>		<p>N/a</p>	<p>Disputed</p>
Preventative actions taken to ensure no further issues will occur		Completion date	<p>Post audit auditor comment.</p> <p>The reason for recording non-compliance is that the load at the ICP Contact is responsible for has changed without a change to the database.</p>
			<p>Clause 10.33A stipulates that the trader is the only party authorized to electrically connect a point of connection, therefore Powerco is electrically connecting the streetlight circuit as an agent to Contact.</p>

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Oct-20</p> <p>To: 04-Nov-21</p>	<p>The field audit found that in absolute terms, total annual consumption is estimated to be 20,800 kWh lower than the DUML database indicates.</p> <p>Nine incorrect gear wattages.</p> <p>Three lights recorded against the incorrect ICP.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be medium based on the potential over submission of 20,800 kWh per annum.</p>	
Actions taken to resolve the issue		Completion date
<p>This finding in the field audit was the result of Powerco changing poles and removing lights without communicating with NPDC until after the work is done. As such, these lights continue to be reconciled until such time as Council is made aware of the change.</p> <p>Lights recorded against the incorrect ICP will be corrected.</p> <p>Incorrect gear wattages will be corrected.</p>		<p>N/a</p> <p>30/11/2021</p> <p>30/11/2021</p>
Preventative actions taken to ensure no further issues will occur		Completion date
<p>We will continue to work with Powerco to tighten this process and ensure that timely communication is received, preferably in advance of any decommission.</p>		Ongoing
<p>Remedial action status</p> <p>Identified</p>		

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Oct-20</p> <p>To: 04-Nov-21</p>	<p>The field audit found that in absolute terms, total annual consumption is estimated to be 20,800 kWh lower than the DUML database indicates.</p> <p>Three lights recorded against the incorrect NSP.</p> <p>Nine incorrect gear wattages.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Livening dates are recorded as the installation date for new connections and change dates may not reflect the date of the change if they are not processed in RAMM at the time that the change occurs.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
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