

Compliance plan for NZTA Tasman 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: 14-Jan-21</p> <p>To: 13-Aug-21</p>	<p>ICP 0000090010NTD07 had the incorrect kWh submitted for June 2021 resulting in under submission of 1,159.93kWh. This is expected to be corrected in R3.</p> <p>Incorrect submission for ICP 0000090011NT142 due to the default value of 55kWh per day being applied resulting in an estimated annual under submission of 2,140.2 kWh. This will be corrected through the audit revision process post the material change being approved.</p> <p>The registry data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 9,300kWh.</p> <p>Incorrect wattages for 13 items of load resulting in an estimated minor under submission of 482.6kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 overall. Simply Energy has a material change in progress to correct the daily kWh values issue but there is room for improvement for the tracking of database changes.</p> <p>The audit risk rating is low based on the estimated kWh volume impact of the database inaccuracy.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>0000090010NTD07 was corrected in EMS' system directly after the R1 submission – this will be corrected in the R3 submission.</p> <p>0000090011NT142 will be correct through revision process now that we have an approved process for submitting unmetered load via CTCS.</p> <p>Incorrect Wattages will be corrected in the database and submissions will be adjusted to reflect these changes.</p> <p>Simply will engage with Network Tasman to get a monthly report of the assets in the DUML database.</p>	<p>20/9/2021</p> <p>Oct 20 will be final month resolved in December 2021</p> <p>30/9/2021</p> <p>30/9/2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Simply Energy have monitoring in place to ensure submission volumes on our DST profile ICPs is accurate; if an error occurs this will be resolved in a timely manner taking into account timeliness and meeting the RM deadlines.</p>	<p>Ongoing</p>	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) &(d) of Schedule 15.3 From: 14-Jan-21 To: 13-Aug-21	One item of load with no light or wattage details populated. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as the processes in place ensure that this detail is captured, and there was only one light that had no wattage or light type recorded. The audit risk rating is recorded as low to none as there was only one light with no wattage recorded.		
Actions taken to resolve the issue		Completion date	Remedial action status
Missing information and Wattages will be corrected in the database and submissions will be adjusted to reflect these changes		30/9/2021	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: 14-Jan-21</p> <p>To: 13-Aug-21</p>	<p>Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 9,300 kWh lower than the DUML database indicates.</p> <p>One item of load missing lamp description and wattage.</p> <p>Incorrect wattages for 13 items of load resulting in an estimated minor under submission of 482.6kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<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 audit risk rating indicates that the impact of database inaccuracy is low based on the estimated kWh of over submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Missing information and Wattages will be corrected in the database and submissions will be adjusted to reflect these changes		30/9/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 14-Jan-21</p> <p>To: 13-Aug-21</p>	<p>ICP 0000090010NTD07 had the incorrect kWh submitted for June 2021 resulting in under submission of 1,159.93kWh. This is expected to be corrected in R3.</p> <p>Incorrect submission for ICP 0000090011NT142 due to the default value of 55kWh per day being applied resulting in an estimated annual under submission of 2,140.2 kWh.</p> <p>The registry data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 9,300kWh.</p> <p>Incorrect wattages for 13 items of load resulting in an estimated minor under submission of 482.6kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate overall. Simply Energy has a material change in progress to correct the daily kWh values issue but there is room for improvement for the tracking of database changes.</p> <p>The audit risk rating is low based on the estimated kWh volume impact of the database inaccuracy.</p>	
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