

Compliance plan for Napier City Council 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-Jun-20</p> <p>To: 17-May-21</p>	<p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>Two of the 25 errors from the 2019 audit still to be corrected.</p> <p>Errors still present for four of six new roads found in the 2020 audit.</p> <p>Some amenity, right of way and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>45 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 28,500 kWh.</p> <p>In absolute terms, total annual consumption is estimated to be 9,400 kWh higher than the DUML database indicates.</p> <p>Database reporting is a monthly snapshot and does not record historic changes.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact is assessed to medium due to the potential impact on settlement accuracy.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will be advising the council that it will be looking into including all private lights until the trader; council and the distributor agree on a solution.</p> <p>Genesis will be reviewing whether to be non compliant by continuing to use the NST profile for submission as all other profiles will result in the same outcome, or bill/settle full nights and be non-compliant for over submission</p> <p>Genesis will revisit the new connections process to see why the continuation of new roads are not being updated into the database in a timely manner</p>	Unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis has revised the private lighting assets and found that there is a trend that the private lights are not catered for by the distributor where SUML is present or when UML is present.</p> <p>Amenity and park lighting will need to be confirmed by the council</p> <p>The half night assets require a check meter or become a metered installation to cater for the half night compliance issue.</p> <p>Genesis has no visibility of newly created roading and is unable to develop measures to report on their inclusion.</p>	Unknown	

ICP identifier and items of load		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 01-Oct-18</p> <p>To: 17-May-21</p>	<p>ICP identifiers in the database are not correct.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak because the design of the database does not ensure ICP identifiers are correct.</p> <p>The audit risk rating is low because the total kWh is correct and there is only one relevant GXP.</p>	
Actions taken to resolve the issue		Completion date
Genesis has revised the private lighting assets and found that there is a trend that the private lights are not catered for by the distributor where SUML or UML is present. Council and Distributor need to agree on who is servicing the lighting assets, the council or the private owners.		Unknown
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis indicative measures will be to move all private assets into council ownership until temporally until the council, trader and distributor can establish what is SUML and what is UML.		Unknown
		Investigating

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 27-Feb-18 To: 17-May-21	Errors still present for four of six new roads found in the 2020 audit resulting in 11 items of load identified still not recorded in the database. Nine additional lights found in the field. Potential impact: Medium Actual impact: Low Audit history: Once 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 is assessed to be low based on number of additional lights found in the field in comparison to the overall number of lights checked.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have provided directive to infrastructure alliance and NCC to have missing assets added to the database.	31/07/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are seeking further understanding of the NCC new connection/tracking of change processes. Genesis is unable to predict new connections or changes and therefore rely heavily on the council's processes to ensure assets information is accurate and timely	unknown	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jun-20</p> <p>To: 12-May-21</p>	<p>In absolute terms, total annual consumption is estimated to be 9,400 kWh higher than the DUML database indicates.</p> <p>Some database discrepancies identified in the 2020 audit still to be corrected.</p> <p>Incorrect ICP identifiers because they are against the pole not the light.</p> <p>Some amenity, right of way and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>43 items of load with the incorrect ballast recorded resulting in a very minor estimated under submission of 431 kWh.</p> <p>45 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 28,500 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact on settlement and participants is moderate because under submission will be occurring; therefore, the audit risk rating is medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to provide feedback and have again raised concerns around the private lights not being actioned appropriately within the database. Genesis will also raise its concerns with the distributor to try and resolve the ownership issue	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis continues to work with the council to mitigate the risk surrounding +- settlement submissions. The estimated value of the impact of private lights due to an ICP being associated is technical. Councils in general will have NZTA/Private lights in their databases in the event the public complain to the council they don't work.</p> <p>Where the private lights need to be addressed is at a distributor level to ensure that these lights, if not under Council ownership are assigned to the correct site/sites depend if SUML or UML.</p>	unknown	

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-Jun-20</p> <p>To: 17-May-21</p>	<p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>Two of the 25 errors from the 2019 audit still to be corrected.</p> <p>Errors still present for four of six new roads found in the 2020 audit.</p> <p>Some amenity, right of way and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>45 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 28,500 kWh.</p> <p>In absolute terms, total annual consumption is estimated to be 9,400 kWh higher than the DUML database indicates.</p> <p>Database reporting is a monthly snapshot and does not record historic changes.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact is assessed to medium due to the potential impact on settlement accuracy.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will be advising the council that it will be looking into including all private lights until the trader; council and the distributor agree on a solution. The provision of assets will be sent to the distributor for assistance in resolving this issue.</p> <p>Genesis will be reviewing whether to be none compliant by continuing to use the NST profile for submission as all other profiles will result in the same outcome, or bill/settle full nights and be non-compliant for over submission</p> <p>Genesis will revisit the new connections process to see why the continuation of new roads are not being updated into the database in a timely manner</p>	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis has revised the private lighting assets and found that there is a trend that the private lights are not catered for by the distributor where SUML is present or when UML is present.</p> <p>Amenity and park lighting will need to be confirmed by the council</p> <p>The half night assets require a check meter or become a metered installation to cater for the half night compliance issue.</p> <p>Genesis has no visibility of newly created roading and is unable to develop measures to report on their inclusion.</p>	Unknown	