

Compliance Plan Nelson 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: 20-Jan-21</p> <p>To: 19-Sep-21</p>	<p>112 NZTA lights being submitted by Genesis but was also being submitted by Trustpower resulting in over submission of an estimated 50,165 kWh from February to September 2020. This will not be corrected as it is outside of the 14-month revision cycle.</p> <p>Eight items of load have zero wattage with an estimated annual under submission of 2,839 kWh.</p> <p>28 items of load with the incorrect ballast applied resulting in an estimated annual under submission of 1,302 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated overall as moderate but there is room for improvement in relation to the processing of revisions.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>In regard to the over submission of the NZTA Lights this has now been corrected and back dated till December 2020 along with the data base been updated showing that these assets as being NZTA.</p> <p>Genesis has advised council of the incorrect wattage and ballast that has been identified by the audit with the intent that council makes every effort to ensure the exceptions are rectified.</p>		01/01/2022	Identified
		Continuous improvement	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>In reference to the NZTA assists this now been identified in the data extract and going forward will no longer be reconciled by Genesis</p>			

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: 11(2)(a) and (aa) of Schedule 15.3 From: 20-Jan-21 To: 21-Sep-21	120 items of load do not have the ICP recorded. Potential impact: Low Actual impact: Low Audit history: 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. There is no impact on settlement and participants as Genesis is correctly reconciling these lamps.; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has investigated the assets that have been listed as 'Private Unmetered lights' to ensure that assets have not been used in submission.	01/01/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 20-Jan-21 To: 21-Sep-21	Eight items of load have zero wattage with an estimated annual under submission of 2,839.94 kWh. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate, as they are sufficient to mitigate the risk most of the time to an acceptable level. The impact is assessed to be low due to the impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has advised council of the incorrect wattage and ballast that has been identified by the audit with the intent that council makes every effort to ensure the exceptions are rectified.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will continue to provide exception reporting to the council where exceptions has been identified.	Continuous improvement	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3) From: 20-Jan-21 To: 21-Sep-21	One additional light found in the field of the 277 items of load sampled. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as Nelson CC have robust processes to ensure that changes are tracked, and this is reflected in the high level of accuracy found in the database. The impact is assessed to be low due to one additional light found in the field in relation to the overall count of the items of load.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed the audit findings with the council with the intent the council makes every effort to ensure the exceptions are rectified.	Continuous improvement	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: 20-Jan-21</p> <p>To: 21-Sep-21</p>	<p>Eight items of load have zero wattage with an estimated annual under submission of 2,391 kWh.</p> <p>28 items of load with the incorrect ballast applied resulting in an estimated annual under submission of 1,302 kWh.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate overall, because they are sufficient to ensure that database wattage is accurate for the bulk of lights which belong to NCC council.</p> <p>The impact is assessed to be low as the database was found to be within the allowable accuracy threshold.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has advised council of the incorrect wattage and ballast that has been identified by the audit with the intent that council makes every effort to ensure the exceptions are rectified.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will continue to provide exception reporting to the council where exceptions has been identified.	Continuous improvement	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 20-Jan-21</p> <p>To: 21-Sep-21</p>	<p>112 NZTA lights being submitted by Genesis but was also being submitted by Trustpower resulting in over submission of an estimated 50,165 kWh from February to September 2020. This will not be corrected as it is outside of the 14 month revision cycle.</p> <p>Eight items of load have zero wattage with an estimated annual under submission of 2,391 kWh.</p> <p>28 items of load with the incorrect ballast applied resulting in an estimated annual under submission of 1,302 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated overall as moderate but there is room for improvement in relation to the processing of revisions.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Regarding the over submission of the NZTA Lights this has now been corrected and back dated till December 2020 along with the data base been updated showing that these assets as being NZTA.</p> <p>Genesis has advised council of the incorrect wattage and ballast that has been identified by the audit with the intent that council makes every effort to ensure the exceptions are rectified.</p>		01/01/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	