

## Compliance plan for Stratford 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: 13-Mar-20</p> <p>To: 30-Jul-21</p>	<p>Estimated over submission of 49,635 kWh for the NZTA lights that were being reconciled in the SDC and NZTA RAMM database.</p> <p>Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 1,700W or 726 kWh p.a.</p> <p>Eight unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120 W or 50.4 kWh p.a.</p> <p>The database is outside of the allowable +/-5% threshold. In absolute terms, total annual consumption is estimated to be 1,500 kWh higher than the DUML database indicates.</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: Low</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 as moderate, as the processes in place are generally robust but the NZTA lighting load being submitted twice reduces the control rating to moderate.</p> <p>The impact is assessed to be low based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has corrected the submission volumes to exclude NZTA asset from the 01/06/2021.		27/09/2021	Identified
Genesis has also discussed the importance of tracking of change and the need to increase database accuracy level.		01/04/2022	
SDC has advised that they will update their RAMM data base to include the Christmas lights and advise on and off dates to Genesis.		01/12/2021	
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will provide exception reporting to the council where exceptions have been identified. Genesis will continue to develop tracking of change requirements with the council to enable compliance to be achieved.		Continuous improvement	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 13-Mar-20</p> <p>To: 30-Jul-21</p>	<p>One light has an unknown lamp model, and a missing lamp wattage and gear wattage.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>Controls are rated as strong as the processes in place for the management of the SDC are robust.</p> <p>The impact is assessed to be low as was only one item of load with missing details.</p>		
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	
Genesis will provide exception reporting to the council where exceptions have been identified. Genesis will continue to develop tracking of change requirements with the council to enable compliance to be achieved.		Continuous improvement	

All load recorded in database			
Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 13-Mar-20</p> <p>To: 30-Jul-21</p>	<p>Four additional lights found in the field from the sample of 154 lights checked.</p> <p>Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 1,700W or 726 kWh p.a.</p> <p>Eight unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120 W or 50.4 kWh p.a.</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		
<b>Low</b>	<p>A control rating of moderate was selected, because the controls over the inclusion of Christmas and decorative lights are weak but will improve to strong once the lights have been added to the database.</p> <p>The impact is assessed to be low based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has discussed the audit findings with the council with the intent that the council makes every effort to ensure that the Christmas lights are included in the RAMM data base and advise of on and off dates.</p> <p>SDC has been provided the details of the missing Lamp information and are currently in the process of updating RAMM.</p>		01/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
No comment provided			

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 12-Mar-20</p> <p>To: 12-Mar-20</p>	<p>The database is outside of the allowable +/-5% threshold. In absolute terms, total annual consumption is estimated to be 1,500 kWh higher than the DUML database indicates.</p> <p>Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 1,700W or 726 kWh p.a.</p> <p>Eight unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120 W or 50.4 kWh p.a.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>A control rating of moderate was selected, because the controls over the inclusion of Christmas and decorative lights are weak but will improve to strong once the lights have been added to the database.</p> <p>The impact is assessed to be low based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
SDC has advised that they will update their RAMM data base to include the Christmas lights and advised on and off dates to Genesis.	01/12/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
No comment provided		

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 13-Mar-20</p> <p>To: 30-Jul-21</p>	<p>Estimated over submission of 49,635 kWh for the NZTA lights that were being reconciled in the SDC and NZTA RAMM database.</p> <p>Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 1,700W or 726 kWh p.a.</p> <p>Eight unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120 W or 50.4 kWh p.a.</p> <p>The database is outside of the allowable +/-5% threshold. In absolute terms, total annual consumption is estimated to be 1,500 kWh higher than the DUML database indicates.</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: Low</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 as moderate, as the processes in place are generally robust but the NZTA lighting load being submitted twice reduces the control rating to moderate.</p> <p>The impact is assessed to be low based on the kWh differences described above.</p>	
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Preventative actions taken to ensure no further issues will occur	Completion date	
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