

Compliance plan for Whakatane DC– October 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-Apr-21</p> <p>To: 07-Oct-21</p>	<p>Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual under submission 32,291 kWh per annum.</p> <p>Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple 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 submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be medium due to the submission variances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are currently working with the council in installing a Golden meter in order to use CMS data however until the golden meter has been installed and supporting data has been obtained to validate on/off times and asset kWh within CMS, Genesis will continue to work with the council in order to obtain monthly data output.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are expecting to remove this non-compliance by utilising the CMS system outputs to settle energy volumes until then Genesis will continue to work with WDC in order obtain a monthly report.	Continuous improvement	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Apr-21 To: 07-Oct-21	Two additional lights found in the field. 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 recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
WDC has been advised of the audit findings and are aware of the need to ensure all asset information is complete and accurate.		
Preventative actions taken to ensure no further issues will occur		Completion date
		Identified

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Apr-21</p> <p>To: 07-Oct-21</p>	<p>Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month. New connections are recorded from the time of vesting, not from the time of livening.</p> <p>Two incorrect wattages found by the field audit.</p> <p>Two additional lights found by the field audit.</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>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement</p> <p>The audit risk rating is assessed to be low due to the error in kWh.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has discussed the audit findings with WDC with regards to the importance of tracking of change. Genesis will continue to work with WDC in order to obtain monthly reporting until then Genesis has been provided with a most recent snapshot of WDC RAMM data base and will use this in order to historically review volumes submitted to the market.</p> <p>Genesis will be re-engaging with the council with regards to installing a golden meter in order to validate accuracy within CMS data base as the council believes it's the trader's responsibility to have this meter installed to validate their database accuracy. The agreement between customer and trader for the cost to install meters will need to be established prior to any metering installations being completed.</p>	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis are expecting to remove this non-compliance by utilising the CMS system outputs to settle energy volumes once an agreement has been reached with regards to the instalment of the golden meter until then Genesis will continue to work with WDC in order to obtain a monthly report.</p>	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: 01-Apr-21</p> <p>To: 07-Oct-21</p>	<p>Variance found between RAMM database extract and the kWh figure submitted by Genesis resulting in an estimated annual under submission 32,291 kWh per annum.</p> <p>Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple 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 submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be medium due to the submission variances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are currently working with the council in installing a Golden meter in order to use CMS data however until the golden meter has been installed and supporting data has been obtained to validate on/off times and asset kWh within CMS, Genesis will continue to work with the council in order to obtain monthly data output.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are expecting to remove this non-compliance by utilising the CMS system outputs to settle energy volumes once an agreement has been reached with regards to the instalment of the golden meter until then Genesis will continue to work with WDC in order obtain a monthly report.	Continuous improvement	