Compliance Plan Buller DC RAMM DUML 2021

| Non-compliance | Description | | | |
|--|---|-----------------|------------------------|--|
| Audit Ref: 2.1 With: Clause 11(1) of | The field audit found a 12% error rate resulting in an estimated annual over submission of 2,396 kWh. | | | |
| Schedule 15.3 | The data used for submission does not track changes at a daily basis and is provided as a snapshot. | | | |
| | Potential impact: Low | | | |
| | Actual impact: Low | | | |
| From: 28-Nov-20 | Audit history: Multiple times previously | | | |
| To: 27-Aug-21 | Controls: Weak | | | |
| 10. 27-Aug-21 | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | The controls are rated as weak as changes in the field are not being reflected in the database. The impact is assessed to be low due to the estimated amount of over submission described above. | | | |
| | | | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| All missing and incorrect information identified has been resolved in the database. | | 29 Sept 2021 | Identified | |
| Preventative actions taken to ensure no further issue will occur | | Completion date | | |
| The majority of inaccuracy was caused by incorrect LED wattages. This was caused by the light manufacturer had upgraded the LED efficiency, so as to produce the same output of light with less energy required. The manufacturer apparently had not communicated this to Buller Networks therefore data capture for the lights was incorrect. Buller network is now aware of this so recording of wattages for future changes should be accurate. | | 29 Sept 2021 | | |
| We are considering the impact the provision and use of database changes at a daily level will have on our processes and tools. | | Ongoing | | |

| Non-compliance | Description | | | | |
|--|---|-----------------|------------------------|--|--|
| Audit Ref: 2.4 | 27 lights with an unknown light type. | | | | |
| With: Clause 11(2)(c) | Potential impact: Low | | | | |
| of Schedule 15.3 | Actual impact: Low | | | | |
| | Audit history: None | | | | |
| From: 29-Nov-19 | Controls: Moderate | | | | |
| To: 25-Sep-20 | Breach risk rating: 2 | | | | |
| Audit risk rating | Rationale for audit risk rating | | | | |
| Low | The controls are rated as moderate as light descriptions are required to be provided when changes are made. | | | | |
| | The impact is assessed to be low due to the small number of lights affected. They were updated during the audit period. | | | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | | |
| All unknown light types have been updated with the relevant information. | | 29 Sept 2021 | Cleared | | |
| Preventative actions taken to ensure no further issue will occur | | Completion date | | | |
| | | | | | |

| Non-compliance | Description | | | |
|---|---|----------------------|------------------------|--|
| Audit Ref: 3.1 With: Clause 15.2 and | The field audit found a 12% error rate resulting in an estimated annual over submission of 2,396 kWh. | | | |
| 15.37B(b) | 27 lights with an unknown light description. | | | |
| | Potential impact: Low | | | |
| | Actual impact: Low | | | |
| From: 28-Nov-20 | Audit history: Once previously | | | |
| To: 27-Aug-21 | Controls: Weak | | | |
| | Breach risk rating: 3 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | The controls are rated as weak as changes in the field are not being reflected in the database. | | | |
| | The impact is assessed to be low due to the estimated amount of over submission described above. | | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| All missing and incorrect information identified has been resolved in the database. | | 29 Sept 2021 | Identified | |
| Preventative actions taken to ensure no further issue will occur | | Completion date | | |
| The majority of inaccuracy was caused by incorrect LED wattages. This was caused by the light manufacturer had upgraded the LED efficiency, so as to produce the same output of light with less energy required. The manufacturer apparently had not communicated this to Buller Networks therefore data capture for the lights was incorrect. Buller network is now aware of this so recording of wattages for future changes should be accurate. We are considering the impact the provision and use of database | | 29 Sept 2021 Ongoing | | |
| changes at a daily level w | ill have on our processes and tools. | | | |

| Non-compliance | Description | | | |
|--|---|-----------------|------------------------|--|
| Audit Ref: 3.2 With: Clause 15.2 and | The field audit found a 12% error rate resulting in an estimated annual over submission of 2,396 kWh. | | | |
| 15.37B(c) | The data used for submission does not track changes at a daily basis and is provided as a snapshot. | | | |
| | Potential impact: Low | | | |
| | Actual impact: Low | | | |
| From: 28-Nov-20 | Audit history: Multiple times | | | |
| | Controls: Weak | | | |
| 10. 27-Aug-21 | To: 27-Aug-21 Breach risk rating: 3 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | The controls are rated as weak as changes in the field are not being reflected in the database. | | | |
| | The impact is assessed to be low due to the estimated amount of over submission described above. | | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| All missing and incorrect information identified has been resolved in the database. | | 29 Sept 2021 | Identified | |
| Preventative actions taken to ensure no further issue will occur | | Completion date | | |
| The majority of inaccuracy was caused by incorrect LED wattages. This was caused by the light manufacturer had upgraded the LED efficiency, so as to produce the same output of light with less energy required. The manufacturer apparently had not communicated this to Buller Networks therefore data capture for the lights was incorrect. Buller network is now aware of this so recording of wattages for future changes should be accurate. | | 29 Sept 2021 | | |
| We are considering the impact the provision and use of database changes at a daily level will have on our processes and tools. | | Ongoing | | |