

Compliance Plan Christchurch City Council DUML 2022

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-Jan-21</p> <p>To: 24-Feb-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 792,200 kWh.</p> <p>45 lamps have incorrect total wattages, resulting in an estimated under submission of 1,192 kWh p.a. based on 4,271 burn hours.</p> <p>Estimated over submission of 443,543 kWh per annum based on dimming of 31,000 lamps.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as weak as the reconciliation process has weak checks in place to ensure submission is correct.</p> <p>The impact is assessed to be high based on the effect on submission due to dimming of lights, and over submission kWh volume.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Orion re-calculate and submit kw values every month for the R3 and R14 submissions; As backdated changes are made in the RAMM database these new values will flow into those calculations and will flow into the submission values provided to the market by Contact Energy.</p> <p>Incorrect ballast values have all been corrected and back dated and will flow into the usual revision submission process.</p>		<p>Ongoing</p> <p>30/4/2022</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>The lights with dimming are centrally controlled via a CMS and work is underway to transition these lights on to new ICPs, which will be reconciled with the newly approved profile owned by LGNZ that allows CMS derived consumption values to be used in submission.</p>		31/7/2022	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Jan-21 To: 24-Feb-22	One additional light not recorded in the database was located in the field. 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	Controls are rated as moderate. The volume of errors occurring since the LED rollout indicate there is room for improvement. The impact is assessed to be low, due to the only one additional light found as part of the field audit.	
Actions taken to resolve the issue	Completion date	Remedial action status
This light has been added to the database and will be picked up in the revision submission process. Orion/CCC will also complete a field audit to confirm other findings in the field audit including lights not found in the field and wattage discrepancies.	31/5/2022	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: 01-Jan-21</p> <p>To: 24-Feb-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 792,200 kWh.</p> <p>45 lamps have incorrect total wattages, resulting in an estimated under submission of 279W or 1,192 kWh p.a. based on 4,271 burn hours.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as moderate. The high volume of errors have been occurring during the LED rollout, this project is in the final stages so it is expected there will be an improvement.</p> <p>The impact is assessed to be high, based on the potential kWh variances detailed above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Ballast values have all been corrected and back dated and will flow into the usual revision submission process.		30/4/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
The transition to using the CMS to reconcile volume will see a significant improvement in the accuracy as majority of lights are now on the CMS system.		31/7/2022	

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-Jan-21</p> <p>To: 24-Feb-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 792,200 kWh.</p> <p>45 lamps have incorrect total wattages, resulting in an estimated under submission of 1,192 kWh p.a. based on 4,271 burn hours.</p> <p>Estimated over submission of 443,543 kWh per annum based on dimming of 31,000 lamps.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak as the reconciliation process has weak checks in place to ensure submission is correct.</p> <p>The impact is assessed to be high based on the effect on submission due to dimming of lights, and over submission kWh volume.</p>	
Actions taken to resolve the issue		Completion date
<p>Orion re-calculate and submit kw values every month for the R3 and R14 submissions; As backdated changes are made in the RAMM database these new values will flow into those calculations and will flow into the submission values provided to the market by Contact Energy.</p> <p>Ballast values have all been corrected and back dated and will flow into the usual revision submission process.</p>		Ongoing
Preventative actions taken to ensure no further issues will occur		Completion date
<p>The lights with dimming are centrally controlled via a CMS and work is underway to transition these lights on to new ICPs, which will be reconciled with the newly approved profile owned by LGNZ that allows CMS derived consumption values to be used in submission.</p>		31/7/2022
Identified		