

# Compliance Plan Central Otago DC DUML 2022

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3  From: 19-Jul-21 To: 11-Jan-22	Over submission of an estimated 25,000 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.  Three lamps with incorrect ballast applied resulting in very minor over submission.  Potential impact: Medium Actual impact: Medium Audit history: Three times previously Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	The controls are rated as moderate as a new streetlight profile has been approved by the Electricity Authority and this is expected to be used in the near future.  The impact is assessed to be medium, based on the kWh differences described above.	
Actions taken to resolve the issue		Completion date
Lamps with suspected incorrect ballast values will be reviewed and corrected where required (or further information provided to auditors)  Issues related to dimming will be able to be corrected once participants are approved to use the new profiles approved by the EA		31/3/2022  30/6/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Remedial action status		
Identified		

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 Clause 11(2)(a) & (aa) of Schedule 15.3  From: 19-Jul-21 To: 11-Jan-22	The ICP is not recorded in the database for 16 items of load.  Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as the ICP is recorded for all but 16 items of load.  The impact is assessed to be low due to the impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
This issue is the result of a miscommunication. These lights relate to a sub-division that was vested in July 2021 but was not added to the CODC RAMM database as they were within the 1-year defect liability period where all costs are the responsibility of the developer. These lights have now been added to RAMM, effective the vesting date, and submissions will be corrected back to the vesting date via the usual revision cycle for submission.	Ramm corrected 28/2/2022; Submissions corrected by 21/9/2022 (July 2021 14-month revision date)	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Process notes for adding lights to RAMM will be reviewed and reworded to ensure it is clear that lights are added to RAMM on the vesting date.	31/3/2022	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 19-Jul-21 To: 11-Jan-22	Four additional lights found in the field. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because they ensure most information is accurate. The impact is assessed to be low due to four additional lights 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
CODC will complete their own field audit on all issues found in table above and will update RAMM where required by adding or removing lights or updating wattages to ensure database is an accurate representation of what is in the field.	31/3/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)  From: 19-Jul-21 To: 11-Jan-22	Three lamps with incorrect ballast applied resulting in very minor over submission.  Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, because field audit indicated the controls are robust but there is room for errors to occur.  The impact is assessed to be low due to the kWh impact.	
Actions taken to resolve the issue	Completion date	Remedial action status
CODC will review findings and paperwork and complete a field audit if required and update where required.	31/3/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<b>Volume information accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.2 Clause 15.2 and 15.37B(c)  From: 19-Jul-21 To: 11-Jan-22	Over submission of an estimated 25,000 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.  Three lamps with incorrect ballast applied resulting in very minor over submission.  Potential impact: Medium  Actual impact: Medium  Audit history: Three times previously  Controls: Moderate  Breach risk rating: 4	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Medium</b>	The controls are rated as moderate as a new streetlight profile has been approved by the Electricity Authority and this is expected to be used in the near future.  The impact is assessed to be medium, based on the kWh differences described above.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
CODC will review ballast findings and paperwork and complete a field audit if required and update where required.  Issues related to dimming will be able to be corrected once participants are approved to use the new profiles approved by the EA	31/3/2022  30/6/2022	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

