

## Compliance plan for Napier CC DUML (GENE) 2022

Audit completion			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26  From: 01-Jun-20 To: 30-May-22	Audit report not completed within the required timeframe. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Strong Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	The controls are rated as Genesis has appointed a dedicated resource to manage streetlight databases including the audit process. . The impact is assessed to medium as the inaccurate submission continues to occur as audits maintain visibility and track progress to address inaccuracies.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis Energy has appointment a DUML Data & Stakeholder Lead to provide information		01/08/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis Energy has appointment a DUML Data & Stakeholder Lead to provide information		01/08/2022	

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-Jun-20</p> <p>To: 30-May-22</p>	<p>In absolute terms, total annual consumption is estimated to be 41,100 kWh lower than the DUML database indicates.</p> <p>Some database discrepancies identified in the previous three audits still to be corrected.</p> <p>Some right of way, amenity and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>44 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 26,630 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact is assessed to medium due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Right of way, Amenity and park lighting will need to be confirmed by the council.</p> <p>Genesis will be reviewing whether to be non-compliant by continuing to use the NST profile for submission as all other profiles will result in the same outcome, or bill/settle full nights and be non-compliant for over submission.</p> <p>Genesis will be advising the council that it will be looking into private lights until the trader; council and the distributor agree on a solution.</p> <p>Genesis Energy has highlighted to third party that change management process should be reviewed so all information is captured.</p>	30/11/2022	Investigating

<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>
For the half night compliance issue to be resolved, the half night assets will require a check meter to be installed or become a metered installation.  Genesis will revise the private lighting assets	30/11/2022

<b>ICP identifier and items of load</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3  From: 01-Oct-18 To: 30-May-22	ICP identifiers in the database are not correct.  Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	The controls are rated as weak because the design of the database does not ensure ICP identifiers are correct.  The audit risk rating is low because the total kWh is correct and there is only one relevant GXP.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Genesis will highlight the auditor's findings to the council and will work with the council to correct ICP identifiers in the database	30/11/2022	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Genesis will work with NCC to have correct information populated	30/11/2022	

<b>All load recorded in database</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 27-Feb-18</p> <p>To: 30-May-22</p>	<p>Errors are still present from the previous three field audit findings.</p> <p>Four additional lights found in the field of 418 items of load sampled.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	<p>The controls are recorded as weak as the processes in place do not ensure that the changes in the database are updated.</p> <p>The impact is assessed to be low based on number of additional lights found in the field in comparison to the overall number of lights checked.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Genesis has reviewed the auditors finding and will provide directive to PSL and NCC to have missing assets added to the database.	30/11/2022	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Genesis has discussed with PSL & is seeking further understanding of the NCC new connection/tracking of change processes. Genesis is unable to predict new connections or changes and therefore rely heavily on the council's processes to ensure assets information is accurate and timely	30/11/2022	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 13-May-21</p> <p>To: 30-May-22</p>	<p>In absolute terms, total annual consumption is estimated to be 41,100 kWh lower than the DUML database indicates.</p> <p>Some database discrepancies identified in the previous three audits still to be corrected.</p> <p>Incorrect ICP identifiers because they are against the pole not the light.</p> <p>Some right of way, amenity and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>17 items of load with the incorrect ballast recorded resulting in an estimated very minor estimated under submission of 224 kWh.</p> <p>44 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 26,630 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as weak as the field findings indicate that the database management processes do not track changes made in the field especially in relation to the addition of new lights to the database.</p> <p>The impact on settlement and participants is assessed to be medium.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis continues to work with the council to mitigate the risk surrounding +- settlement submissions</p> <p>Genesis Energy will have a discussion with Napier City Council if they are willing to have these lights metered or if they are willing to assist with installation of a check meter so data can be validated. NCC will need to provide this validated data and an application for new profile shape.</p> <p>Right of way, Amenity and park lighting will need to be confirmed by the council</p> <p>Genesis will be advising the council that it will be looking into private lights until the trader; council and the distributor agree on a solution.</p> <p>Genesis Energy has highlighted to third party that change management process should be reviewed so all information is captured.</p>	30/11/2022	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
<p>For the half night compliance issue to be resolved, the half night assets will require a check meter to be installed or become a metered installation.</p> <p>Genesis will revise the private lighting assets</p> <p>Genesis Energy will work with third party to identify and rectify new connections and improve change management process.</p>	30/11/2022	

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-Jun-20</p> <p>To: 30-May-22</p>	<p>In absolute terms, total annual consumption is estimated to be 41,100 kWh lower than the DUMML database indicates.</p> <p>Some database discrepancies identified in the previous three audits still to be corrected.</p> <p>Some right of way, amenity and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>44 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 26,630 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact is assessed to medium due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis continues to work with the council to mitigate the risk surrounding +- settlement submissions</p> <p>Genesis Energy will have a discussion with Napier City Council if they are willing to have these lights metered or if they are willing to assist with installation of a check meter so data can be validated. NCC will need to provide this validated data and an application for new profile shape.</p> <p>Right of way, Amenity and park lighting will need to be confirmed by the council</p> <p>Genesis will be advising the council that it will be looking into private lights until the trader; council and the distributor agree on a solution.</p> <p>Genesis Energy has highlighted to third party that change management process should be reviewed so all information is captured.</p>	30/11/2022	Investigating

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<p>For the half night compliance issue to be resolved, the half night assets will require a check meter to be installed or become a metered installation.</p> <p>Genesis will revise the private lighting assets</p> <p>Genesis Energy will work with third party to identify and rectify new connections and improve change management process.</p>	30/11/2022	