

ELECTRICITY INDUSTRY PARTICIPATION CODE  
DISTRIBUTED UNMETERED LOAD AUDIT REPORT

VERITEK

For

WAIPA DISTRICT COUNCIL AND  
GENESIS ENERGY  
NZBN:9429037706609

Prepared by: Rebecca Elliot and Steve Woods

Date audit commenced: 30 June 2022

Date audit report completed: 25 August 2022

Audit report due date: 30-Aug-22

---

## TABLE OF CONTENTS

Executive summary .....	3
Audit summary .....	4
Non-compliances .....	4
Recommendations .....	5
Issues 5	
1. Administrative .....	6
1.1. Exemptions from Obligations to Comply with Code .....	6
1.2. Structure of Organisation .....	6
1.3. Persons involved in this audit.....	7
1.4. Hardware and Software .....	7
1.5. Breaches or Breach Allegations.....	7
1.6. ICP Data .....	7
1.7. Authorisation Received .....	8
1.8. Scope of Audit .....	8
1.9. Summary of previous audit .....	9
1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F) .....	10
2. DUML database requirements.....	11
2.1. Deriving submission information (Clause 11(1) of Schedule 15.3) .....	11
2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3) .....	12
2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3) .....	13
2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3) .....	13
2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3) .....	14
2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3) .....	15
2.7. Audit trail (Clause 11(4) of Schedule 15.3).....	16
3. Accuracy of DUML database .....	17
3.1. Database accuracy (Clause 15.2 and 15.37B(b)) .....	17
3.2. Volume information accuracy (Clause 15.2 and 15.37B(c)) .....	21
Conclusion .....	23
Participant response .....	24

## EXECUTIVE SUMMARY

This audit of the **Waipa District Council Unmetered Streetlights (WDC)** DUML database and processes was conducted at the request of **Genesis Energy Ltd (Genesis)**, in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

This database switched to Genesis Energy from 1 July 2022 on 26 July 2022.

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by Waipa DC. McKay Electrical conducts the installation fieldwork and maintenance. They are expected to provide information on all work carried out back to Waipa DC and this is then loaded into RAMM. The field audit found a high level of error indicating that this process is not working as expected. There is an estimated under submission of 131,400 kWh per annum and could potentially be between 30,500 kWh to 361,400 kWh under submission of under submission. I have recommended a full field audit to bring the database up to date.

Waipa DC provides reporting to Genesis on a monthly basis, and this includes any changes made during the month so that change is calculated on a daily basis as required by the code.

The previous audits found that LED lamp descriptions were insufficient to determine the wattage, but I was able to confirm in this audit that these details are contained in another field in RAMM and are sufficient. I did identify that the wattage and lamp value fields were not populated and were being derived by separating the fields in the monthly wattage report. This is non-compliant and WDC are working to populate these fields.

This audit found four non-compliances and makes three recommendations. The future risk rating of 30 indicates that the next audit be completed in three months. I have considered this in conjunction with the fact that Genesis has only just gained this database and recommend that the next audit is conducted in nine months, to allow sufficient time for them to engage with the council to get the matters raised resolved.

## AUDIT SUMMARY

### NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400kWh p.a. higher than the database indicates.	Weak	High	9	Investigating
All load recorded in database	2.5	11(2A) of Schedule 15.3	Three additional items of load were found in the field.	Weak	Low	3	Investigating
Database accuracy	3.1	15.2 and 15.37B(b)	<p>The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400kWh p.a. higher than the database indicates.</p> <p>Seven items of load with the incorrect ballast and one light recorded with the incorrect light type. This will result in a very minor amount of over submission.</p> <p>Electrical connection dates may be incorrect for new subdivisions.</p>	Weak	High	9	Identified

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400kWh p.a. higher than the database indicates.	Weak	High	9	Investigating
Future Risk Rating						30	

<b>Future risk rating</b>	0	1-4	5-8	9-15	16-18	19+
<b>Indicative audit frequency</b>	36 months	24 months	18 months	12 months	6 months	3 months

## RECOMMENDATIONS

Subject	Section	Recommendation
Database accuracy	3.1	Undertake 100% field audit to bring database up to date, including resurveying the Te Awamutu under verandah lighting and plotting these correctly.
		Confirm the correct lamp wattage for all lights labelled 60W MH in the field but recorded as 70W HPS in the database in Leamington.
		Put quality control processed in place to improve data accuracy from the field.

## ISSUES

Subject	Section	Description	Issue
		Nil	

## 1. ADMINISTRATIVE

### 1.1. Exemptions from Obligations to Comply with Code

#### Code reference

*Section 11 of Electricity Industry Act 2010.*

#### Code related audit information

*Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.*

#### Audit observation

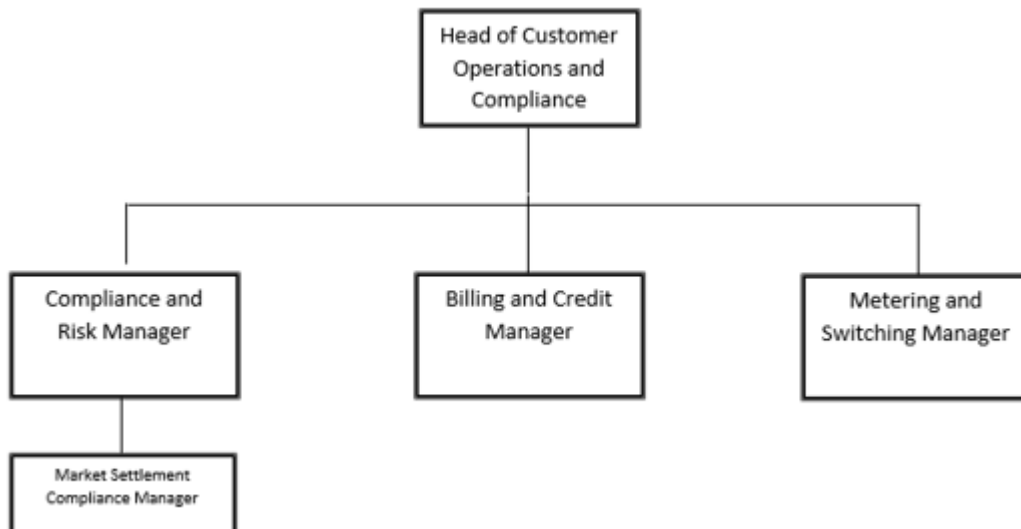
Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

#### Audit commentary

There are no exemptions in place relevant to the scope of this audit.

### 1.2. Structure of Organisation

Genesis provided the relevant organisational structure:



### 1.3. Persons involved in this audit

Auditors:

Name	Company	Role
Rebecca Elliot	Veritek Limited	Lead Auditor
Steve Woods	Veritek Limited	Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Kim Wright	Asset Information Officer - Transportation	Waipa District Council
Julia Jones	Rubiks SME – Retail Market Interaction	Genesis Energy
Nivar Teli	DUML Data & Stakeholder Lead	Genesis Energy

### 1.4. Hardware and Software

**Section 1.8** shows that the SQL database used for the management of DUML is remotely hosted by thinkproject New Zealand Ltd. The database is commonly known as “RAMM” which stands for “Roading Asset and Maintenance Management”. The specific module used for DUML is called RAMM Contractor.

Database back-up is in accordance with standard industry procedures. Access to the database is secure by way of password protection.

Systems used by the trader to calculate submissions are assessed as part of their reconciliation participant audit.

### 1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

### 1.6. ICP Data

ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0000400319WA4CA	Waipa DC TMU0111 S/L	TMU0111	DST	2,252	83,385
0000806500WA13E	Waipa DC CBG0111 S/L	CBG0111	DST	2,736	124,807
0000041292WEDF7	Waipa District Council - Tamahere	HAM0331	DST	92	6,535
0000041294WEC78	Oaklands Drive	OAK0111	DST	50	2,970
Total				5,130	217,697

### 1.7. Authorisation Received

All information was provided directly by Genesis or WDC.

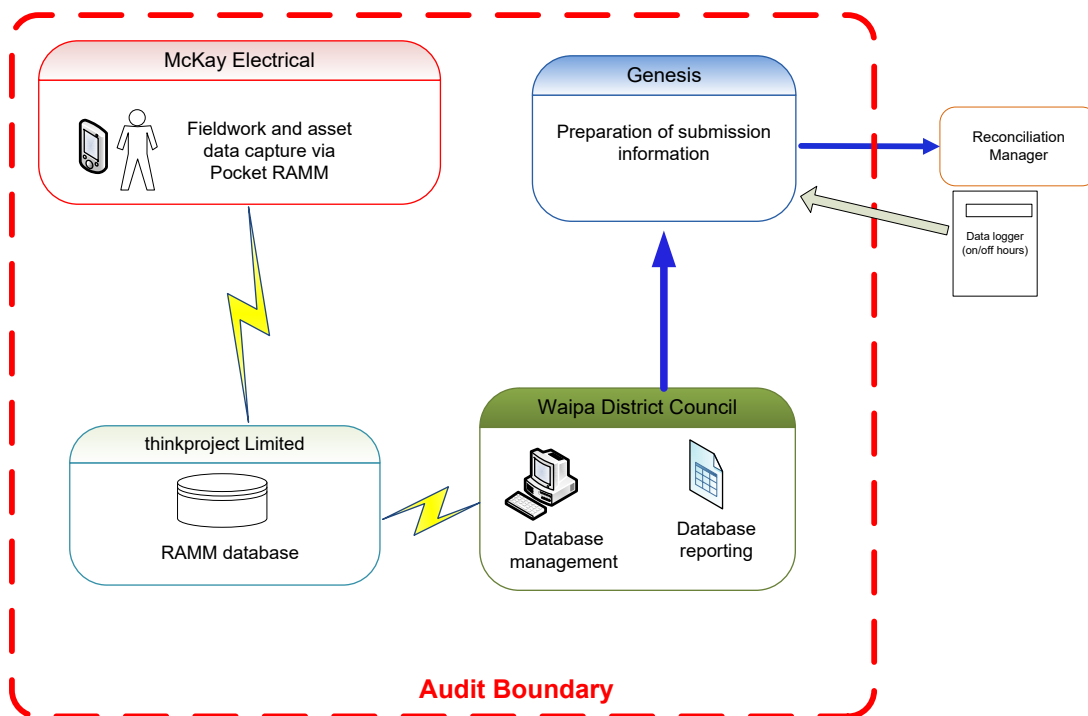
### 1.8. Scope of Audit

This audit of the Waipa District Council Unmetered Streetlights (WDC) DUML database and processes was conducted at the request of Genesis Energy Limited (Genesis), in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by Waipa DC. McKay Electrical conducts the installation fieldwork and maintenance. They provide information on all work carried out back to Waipa DC and this is then loaded into RAMM. Waipa DC provides reporting to Genesis on a monthly basis.

The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database contents. The diagram below shows the audit boundary for clarity.



The field audit was undertaken of a statistical sample of 246 items of load on July 14<sup>th</sup>, 2022.



## 1.9. Summary of previous audit

The previous audit was conducted in December 2021 by Steve Woods of Veritek Limited for Meridian Energy. The current status of those findings is shown in the table below.

### Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
Deriving submission information	2.1	11(1) of Schedule 15.3	The field audit indicated that in absolute terms, total annual consumption is estimated to be 28,100 kWh lower than the DUMML database indicates.	Still existing
			Submission is based on a snapshot and does not consider historic adjustments.	Cleared
Description and capacity of load	2.4	11(2)(d) of Schedule 15.3	LED lamp descriptions are not adequate to identify whether the wattages are correct.	Cleared
All load recorded in database	2.5	11(2A) of Schedule 15.3	One additional item of load was found in the field.	Still existing
Database accuracy	3.1	15.2 and 15.37B(b)	The field audit identified over submission of 28,100 kWh per annum.	Still existing
			Two items of load had incorrect GPS coordinates.	Still existing
			LED descriptions are not sufficient to confirm wattages are correct.	Cleared
			Electrical connection dates may be incorrect for new subdivisions.	Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	The field audit indicated that in absolute terms, total annual consumption is estimated to be 28,100 kWh lower than the DUMML database indicates.	Still existing
			Submission is based on a snapshot and does not consider historic adjustments.	Cleared

## 1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

### **Code reference**

*Clause 16A.26 and 17.295F*

### **Code related audit information**

*Retailers must ensure that DUML database audits are completed:*

- 1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)*
- 2. within three months of submission to the reconciliation manager (for new DUML)*
- 3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.*

### **Audit observation**

Genesis have requested Veritek to undertake this streetlight audit.

### **Audit commentary**

This audit report confirms that the requirement to conduct an audit has been met for this database.

### **Audit outcome**

Compliant

## 2. DUML DATABASE REQUIREMENTS

### 2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

#### Code reference

*Clause 11(1) of Schedule 15.3*

#### Code related audit information

*The retailer must ensure the:*

- *DUML database is up to date*
- *methodology for deriving submission information complies with Schedule 15.5.*

#### Audit observation

The process for calculation of consumption was examined and the application of profiles was checked. The database was checked for accuracy.

#### Audit commentary

Genesis reconciles the DUML load as NHH using the NST profile. This database switched to Genesis in July 2022. A RAMM extract is sent each month, and this includes changes made during the month, so changes are calculated on a daily basis. The total volume submitted to the Reconciliation Manager is based on a monthly database report derived from RAMM and the “burn time” which is sourced from data loggers installed on the WEL and Waipa networks.

I recalculated the submissions for July 2022 using the data logger and the database information and the submission figures matched.

As recorded in **section 3.1**:

- seven items of load with the incorrect ballast and one light recorded with the incorrect light type. This will result in a very minor amount of over submission.
- the database is not within the allowable +/-5% accuracy threshold. This will be resulting in an estimated under annual submission of 131,400 kWh and could potentially be between 30,500 kWh p.a. to 361,400 kWh p.a. under submission.

#### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of schedule 15.3  From: 16-Dec-21 To: 31-Jul-22	<p>Seven items of load with the incorrect ballast and one light recorded with the incorrect light type. This will result in a very minor amount of over submission.</p> <p>The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400kWh p.a. higher than the database indicates.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as weak as the processes in relation to submission are strong but there are no controls in place to ensure the database is accurate, so the overall rating is assessed to be weak.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to work with the council to improve accuracy levels within their database.		01/10/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis relies on Waipa DC to accurately maintain its database.		01/10/2022	

## 2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

### Code reference

*Clause 11(2)(a) and (aa) of Schedule 15.3*

### Code related audit information

*The DUMML database must contain:*

- *each ICP identifier for which the retailer is responsible for the DUMML*
- *the items of load associated with the ICP identifier.*

### Audit observation

The database was checked to confirm an ICP was recorded against each item of load.

### Audit commentary

All items of load in RAMM have an ICP number recorded.

### Audit outcome

Compliant

## 2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

### Code reference

*Clause 11(2)(b) of Schedule 15.3*

### Code related audit information

*The DUMML database must contain the location of each DUMML item.*

### Audit observation

The database was checked to confirm the location is recorded for all items of load.

### Audit commentary

The database contains the nearest street address for all items of load and most have a GPS location recorded. No blanks were identified. The field audit found that the GPS co-ordinates for a number of items of load were incorrect. This is discussed in **section 3.1**.

### Audit outcome

Compliant

## 2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

### Code reference

*Clause 11(2)(c) and (d) of Schedule 15.3*

### Code related audit information

*The DUMML database must contain:*

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

### Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

### Audit commentary

The database contains two records for wattage, firstly the lamp wattage and secondly the gear wattage, which represents ballast losses. The wattage value was being derived by separating the lamp model value out to a separate column instead of using the value recorded in the lamp wattage field. This has been corrected from July 2022. The accuracy of the ballast values applied is discussed in **section 3.1**.

The previous audits found that the lamp type descriptions for LEDs was insufficient to determine the correct wattage was applied. I confirmed in this audit that these are recorded in the database and are sufficient to determine this.

### Audit outcome

Compliant

## 2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

### Code reference

Clause 11(2A) of Schedule 15.3

### Code related audit information

*The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.*

### Audit observation

The field audit was undertaken of a statistical sample of 246 items of load.

### Audit commentary

The field audit discrepancies are detailed in the table below.

Discrepancy	Quantity
Items of load in the field not in the database	3
Items of load in the database not in the field	3
Incorrect wattages	25

The discrepancies from the last audit have not been corrected. These have been resent to WDC for attention.

The field audit found three additional lamps in the field.

The accuracy of the database is discussed in **section 3.1**.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 16-Dec-21 To: 31-Jul-22	Three additional items of load were found in the field. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak as there are no quality control processes in place to ensure data quality in the field. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has reviewed the auditors finding and will advise WDC of the discrepancy with the intent that WDC makes every effort to ensure the exceptions are rectified.		01/10/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
WDC will be notified of the asset discrepancies. Genesis relies on WDC to accurately maintain its database.		01/10/2022	

## 2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

### Code reference

Clause 11(3) of Schedule 15.3

### Code related audit information

*The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.*

### Audit observation

The process for tracking of changes in the database was examined.

### Audit commentary

The RAMM database functionality achieves compliance with the code.

The change management process and the compliance of the database reporting provided to Genesis is detailed in **sections 3.1** and **3.2**.

### Audit outcome

Compliant

## 2.7. Audit trail (Clause 11(4) of Schedule 15.3)

### **Code reference**

*Clause 11(4) of Schedule 15.3*

### **Code related audit information**

*The DUML database must incorporate an audit trail of all additions and changes that identify:*

- *the before and after values for changes*
- *the date and time of the change or addition*
- *the person who made the addition or change to the database.*

### **Audit observation**

The database was checked for audit trails.

### **Audit commentary**

The RAMM database has a complete audit trail of all additions and changes to the database information.

### **Audit outcome**

Compliant



### 3. ACCURACY OF DUML DATABASE

#### 3.1. Database accuracy (Clause 15.2 and 15.37B(b))

##### Code reference

Clause 15.2 and 15.37B(b)

##### Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

##### Audit observation

The DUML Statistical Sampling Guideline was used to determine the database accuracy. The table below shows the survey plan.

Plan Item	Comments
Area of interest	Te Awamutu and surrounds
Strata	The database contains items of load in Waipa District Council area. The processes for the management of WDC items of load are the same, but I decided to place the items of load into four strata, as follows: <ol style="list-style-type: none"> <li>1. Waipa A-G,</li> <li>2. Waipa H-O,</li> <li>3. Waipa P-Z, and</li> <li>4. UVL.</li> </ol>
Area units	I created a pivot table of the roads in each area, and I used a random number generator in a spreadsheet to select a total of 37 sub-units.
Total items of load	246 items of load were checked.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority against the database or in the case of LED lights against the LED light specification.

The change management process and timeliness of database updates was evaluated.

##### Audit commentary

##### Database accuracy based on the field audit

A field audit was conducted of a statistical sample of 246 items of load. The “database auditing tool” was used to analyse the results, which are shown in the table below.

Result	Percentage	Comments
The point estimate of R	114.1	Wattage from survey is higher than the database wattage by 14.1%
R <sub>L</sub>	103.3	With a 95% level of confidence, it can be concluded that the error could be between +3.3% and +38.8%
R <sub>H</sub>	138.8	

These results were categorised in accordance with the “Distributed Unmetered Load Statistical Sampling Audit Guideline”, effective from 1 February 2019. The conclusion from Scenario B is that the variability of the sample results across the strata with statistical significance means that the true wattage (installed in the field) could be between 3.3% and 38.8% higher than the wattage recorded in the DUML database. Non-compliance is recorded because the potential error is greater than 5.0%.

- In absolute terms the installed capacity is estimated to be 31.0 kW lower than the database indicates.
- There is a 95% level of confidence that the installed capacity is between 7 kW to 85 kW higher than the database.
- In absolute terms, total annual consumption is estimated to be 131,400 kWh higher than the DUML database indicates.
- There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400 kWh p.a. lower than the database indicates.

Scenario	Description
<b>A - Good accuracy, good precision</b>	<p>This scenario applies if:</p> <p>(a) <math>R_H</math> is less than 1.05; and</p> <p>(b) <math>R_L</math> is greater than 0.95</p> <p>The conclusion from this scenario is that:</p> <p>(a) the best available estimate indicates that the database is accurate within +/- 5 %; and</p> <p>(b) this is the best outcome.</p>
<b>B - Poor accuracy, demonstrated with statistical significance</b>	<p>This scenario applies if:</p> <p>(a) the point estimate of R is less than 0.95 or greater than 1.05</p> <p>(b) as a result, either <math>R_L</math> is less than 0.95 or <math>R_H</math> is greater than 1.05.</p> <p>There is evidence to support this finding. In statistical terms, the inaccuracy is statistically significant at the 95% level</p>
<b>C - Poor precision</b>	<p>This scenario applies if:</p> <p>(a) the point estimate of R is between 0.95 and 1.05</p> <p>(b) <math>R_L</math> is less than 0.95 and/or <math>R_H</math> is greater than 1.05</p> <p>The conclusion from this scenario is that the best available estimate is not precise enough to conclude that the database is accurate within +/- 5 %</p>

I recommend that a full field audit is undertaken to correct the data.

Recommendation	Description	Audited party comment	Remedial action
Database accuracy	Undertake 100% field audit to bring database up to date, including resurveying the Te Awamutu under verandah lighting and plotting these correctly.	Genesis will discuss auditor’s recommendations with WDC with the intent that WDC makes every effort to ensure this is actioned as soon as best suitable to them.	Investigating

## Lamp description and capacity accuracy

### Wattage accuracy

The database contains two records for wattage, firstly the lamp wattage and secondly the gear wattage, which represents ballast losses. The wattage value was being derived by separating the lamp model value out to a separate column instead of using the value recorded in the lamp wattage field. This has been corrected from July 2022.

The database was examined and found a small number of incorrect ballasts being applied as detailed below:

Lamp Type	Expected ballast	Ballast applied	Total items of load	Total wattage
60W MH	6	14	7	-56

There are approximately 221 lights in the Leamington area that are labelled as 60W metal halide (total 74W) but are recorded in the database as 70W HPS (83W total wattage). I was unable to determine if these have physically changed in the field or incorrectly updated in the database. If they have been incorrectly updated this will be causing an estimated over submission of 8,495 kWh per annum. I have not recorded non-compliance as I cannot determine if over submission is occurring but recommend that this is investigated as soon as possible.

Recommendation	Description	Audited party comment	Remedial action
Database accuracy	Confirm the correct lamp wattage for all lights labelled 60W MH in the field but recorded as 70W HPS in the database in Leamington.	Genesis will raise with WDC and request the lamp wattage exceptions to be investigated.	Investigating

One incorrect light type of 90W MH is recorded but no such light type exists. These findings have been passed to WDC to investigate.

The previous audits found that the lamp type descriptions for LEDs was insufficient to determine the correct wattage was applied. I confirmed in this audit that these are recorded in the database and are sufficient to determine this.

### **NZTA lighting**

NZTA lights are not included in the load recorded by WDC. These are managed by NZTA directly.

### **Private lights**

No private lights are recorded in the database.

### **ICP accuracy**

All items of load have the correct ICP recorded.

### **Location accuracy**

The sample of under-verandah lighting in Te Awamutu checked found that the GPS coordinates were incorrect. I recommend that all the under-verandah lighting is resurveyed and plotted correctly as part of the 100% field audit recommended above.

**Change management process findings**

Processes to track changes to the database were reviewed.

McKay Electrical enters details of changes directly into the database using pocket RAMM. Subdivision information comes from developers via “as built” plans. Waipa DC enters these details, using the install date from the plans, which may differ to the electrical connection date.

There are no quality control measures in place to ensure that the data entered is correct. This is evident in the database accuracy findings. I recommend that quality control processes are put in place.

Recommendation	Description	Audited party comment	Remedial action
Database accuracy	Put quality control processes in place to improve data accuracy from the field.	Genesis will highlight auditors finding to WDC with the intent that WDC makes every effort to ensure quality control is put in place to improve accuracy.	Investigating

There are no festive lights connected to the streetlight circuits.

**Audit outcome**

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)  From: 16-Dec-21 To: 31-Jul-22	The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400kWh p.a. higher than the database indicates.  Seven items of load with the incorrect ballast and one light recorded with the incorrect light type. This will result in a very minor amount of over submission.  Electrical connection dates may be incorrect for new subdivisions.  Potential impact: High  Actual impact: High  Audit history: Twice  Controls: Weak  Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
<b>High</b>	The controls are rated as weak as there are no quality control processes in place to ensure data quality entered in the field.  The impact is assessed to be high, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to work with the council to improve accuracy levels within their database.  Genesis will discuss with WDC and notify asset discrepancies.		01/10/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis relies on WDC to accurately maintain its database.		01/10/2022	

### 3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

#### Code reference

Clause 15.2 and 15.37B(c)

#### Code related audit information

The audit must verify that:

- volume information for the DUML is being calculated accurately
- profiles for DUML have been correctly applied.

#### Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that the ICP has the correct profile and submission flag, and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

### Audit commentary

Genesis reconciles the DUML load as NHH using the NST profile. This database switched to Genesis in July 2022. A RAMM extract is sent each month, and this includes changes made during the month, so changes are calculated on a daily basis. The total volume submitted to the Reconciliation Manager is based on a monthly database report derived from RAMM and the “burn time” which is sourced from data loggers installed on the WEL and Waipa networks.

I recalculated the submissions for July 2022 using the data logger and the database information and the submission figures matched.

As recorded in **section 3.1**, the database is not within the allowable +/-5% accuracy threshold. This will be resulting in an estimated under annual submission of 131,400 kWh and could potentially be between 30,500 kWh p.a. to 361,400 kWh p.a. under submission.

### Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)  From: 16-Dec-21 To: 31-Jul-22	The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 30,500 kWh p.a. to 361,400kWh p.a. higher than the database indicates.  Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak as the processes in relation to submission are strong but there are no controls in place to ensure the database is accurate, so the overall rating is assessed to be weak.  The impact is assessed to be high, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to work with the council to improve accuracy levels within their database.		01/10/2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis relies on Waipa DC to accurately maintain its database.		01/10/2022	

## CONCLUSION

This database switched to Genesis Energy from 1 July 2022 on 26 July 2022.

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by Waipa DC. McKay Electrical conducts the installation fieldwork and maintenance. They are expected to provide information on all work carried out back to Waipa DC and this is then loaded into RAMM. The field audit found a high level of error indicating that this process is not working as expected. There is an estimated under submission of 131,400 kWh per annum and could potentially be between 30,500 kWh to 361,400 kWh under submission of under submission. I have recommended a full field audit to bring the database up to date.

Waipa DC provides reporting to Genesis on a monthly basis, and this includes any changes made during the month so that change is calculated on a daily basis as required by the code.

The previous audits found that LED lamp descriptions were insufficient to determine the wattage, but I was able to confirm in this audit that these details are contained in another field in RAMM and are sufficient. I did identify that the wattage and lamp value fields were not populated and were being derived by separating the fields in the monthly wattage report. This is non-compliant and WDC are working to populate these fields.

This audit found four non-compliances and makes three recommendations. The future risk rating of 30 indicates that the next audit be completed in three months. I have considered this in conjunction with the fact that Genesis has only just gained this database and recommend that the next audit is conducted in nine months, to allow sufficient time for them to engage with the council to get the matters raised resolved.

## PARTICIPANT RESPONSE

Genesis continues to build on their relationship with the council. Genesis continues to work with the council to improve accuracy levels within their database.