# Compliance plan for Auckland Transport DUML 2022

| Deriving submission information | |
|---|---|
| **Non-compliance** | **Description** |
| Audit Ref: 2.1<br>With: 11(1) of Schedule 15.3<br><br>From: 30-Apr-21<br>To: 05-Apr-22 | The variance of wattage values between the SLV system and RAMM is calculated to be 414,131.54 kWh per annum. I have not considered this in the audit risk rating as RAMM is less accurate, but the more accurate SLV is being used for submission.<br><br>Over submission because of dimming being used. The impact on submission is unknown.<br><br>185 items of load with zero or blank wattage recorded indicating potential under submission of 39,507 kWh.<br><br>491 items of load with the incorrect ballast recorded resulting in an estimated over submission of 23,540 kWh per annum.<br><br>Items of load for NSP STG0111 recorded against the incorrect ICP resulting in an estimated 20,586.22 kWh per annum being reconciled to the wrong network.<br><br>Metered streetlights on embedded networks NSP WHA0011, CMW0011, KUA0011, ORA0011 and BJL0011 incorrectly reconciled as unmetered load resulting in an estimated over submission of 96,674.78 kWh per annum.<br><br>856 metered or solar items of load recorded against unmetered ICPs resulting in an estimated over submission of 332,284.65 kWh per annum.<br><br>107 items of load recorded against the incorrect ICP, NSP and network.<br><br>There is a 95% level of confidence that the annual consumption is between 1,772,300 kWh p.a. lower to 1,824,300 kWh p.a. higher than the database indicates.<br><br>Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month.<br><br>Potential impact: High<br><br>Actual impact: High<br><br>Audit history: Multiple times<br><br>Controls: Moderate<br><br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **High** | The controls are rated as moderate, as the processes in place will mitigate risk to an acceptable level and once submission is derived from the SLV system this should move to strong.<br><br>The audit risk rating is high due to the indicative kWh variances found for those that can be quantified. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Meridian is working with Auckland Transport to determine whether eligibility criteria for recently approved profiles can be met with the SLV system or whether a further profile for the dimming lights will be necessary.<br><br>Meridian has notified Auckland Transport of the discrepancies and required corrections. Auckland Transport has advised that they will be conducting site visits and will work on corrections over the next 2 months. There has been a dedicated resource allocated. | Ongoing<br><br>1/7/2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.<br><br>Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy | **Ongoing** | |

| ICP identifier and items of load | |
|---|---|
| **Non-compliance** | **Description** |
| Audit Ref: 2.2<br>With: 11(2)(a) of Schedule 15.3<br><br>From: 30-Apr-21<br>To: 05-Apr-22 | No load associated with ICP 0000041244WE13A resulting in an estimated 20,586.11 kWh being reconciled to the incorrect ICP and network.<br>Potential impact: Medium<br>Actual impact: Medium<br>Audit history: None<br>Controls: Weak<br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **Medium** | The controls are rated as weak as the accuracy of load associated with ICPs is not managed.<br>The audit risk rating is medium due to potential submission against the incorrect NSP and balancing area having a direct impact on settlement |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Meridian has notified Auckland Transport of the discrepancies and required corrections. Auckland Transport has advised that they will be conducting site visits and will work on corrections over the next 2 months. There has been a dedicated resource allocated. | 1/7/2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.<br><br>Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy | Ongoing | |

| Description and capacity of load | |
|---|---|
| **Non-compliance** | **Description** |
| Audit Ref: 2.4<br>With: 11(2)(c) and (d) of Schedule 15.3<br><br>From: 03-May-21<br>To: 31-Mar-22 | 185 items of load with blank or zero wattage recorded. 173 of these have no lamp description resulting in an estimated annual under submission of 39,507 kWh.<br>134 items of load with invalid descriptions.<br>Potential impact: High<br>Actual impact: Medium<br>Audit history: Multiple times<br>Controls: Moderate<br>Breach risk rating: 4 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **Medium** | The controls are rated as moderate. Meridian are working with Auckland Transport to align the data in RAMM with SLV and SLV is expected to be used for the LED lighting load which will move the controls to strong.<br>The audit risk rating is medium due to potential under submission of 39,507 kWh per annum. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Meridian has notified Auckland Transport of the discrepancies and required corrections. Auckland Transport has advised that they will be conducting site visits and will work on corrections over the next 2 months. There has been a dedicated resource allocated. | 1/7/2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.<br><br>Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy | Ongoing | |

| All load recorded in database | | | |
|---|---|---|---|
| **Non-compliance** | **Description** | | |
| Audit Ref: 2.5<br>With: 11(2A) of Schedule 15.3<br><br>From: 01-Aug-20<br>To: 30-Apr-21 | 48 additional lights found in the field or 5.5% of the load sampled.<br>Potential impact: High<br>Actual impact: Medium<br>Audit history: Multiple times<br>Controls: Moderate<br>Breach risk rating: 4 | | |
| **Audit risk rating** | **Rationale for audit risk rating** | | |
| **Medium** | The controls are recorded as moderate as they will mitigate risk most of the time but there is room for improvement.<br>The audit risk rating is medium as the number of additional lights found in the field was 5% of the overall sample checked which would potentially have a medium impact on reconciliation accuracy for this large database. | | |
| **Actions taken to resolve the issue** | | **Completion date** | **Remedial action status** |
| Meridian has notified Auckland Transport of the discrepancies and required corrections. Auckland Transport has advised that they will be conducting site visits and will work on corrections over the next 2 months. There has been a dedicated resource allocated. | | 1/7/2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | | **Completion date** | |
| Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.<br><br>Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy | | Ongoing | |

| Database accuracy | |
|---|---|
| **Non-compliance** | **Description** |
| Audit Ref: 3.1<br>With: Clause 15.2 and 15.37B(b)<br><br>From: 03-May-21<br>To: 31-Mar-22 | There is a 95% level of confidence that the annual consumption is between 1,772,300 kWh p.a. lower to 1,824,300 kWh p.a. higher than the database indicates.<br><br>185 items of load with blank or zero wattage recorded. 173 of these have no lamp description resulting in an estimated annual under submission of 39,507 kWh.<br><br>134 items of load with invalid descriptions.<br><br>4,887 26.7 watt LEDs are recorded as 26 watts in the database. The wattage will be correctly recorded in SLV, so I have not considered this in the audit risk rating.<br><br>491 items of load with the incorrect ballast recorded resulting in an estimated over submission of 23,540 kWh per annum.<br><br>Items of load for NSP STG0111 recorded against the incorrect ICP resulting in an estimated 20,586.22 kWh per annum being reconciled to the wrong network.<br><br>Metered streetlights on embedded networks NSP WHA0011, CMW0011, KUA0011, ORA0011 and BJL0011 incorrectly reconciled as unmetered load resulting in an estimated over submission of 96,674.78 kWh per annum.<br><br>107 items of load recorded against the incorrect ICP, NSP and network.<br><br>856 metered or solar items of load recorded against unmetered ICPs resulting in an estimated over submission of 332,284.65 kWh per annum.<br><br>Potential impact: High<br><br>Actual impact: High<br><br>Audit history: Multiple times<br><br>Controls: Moderate<br><br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **High** | The controls are rated as moderate. Whilst there are a large number of discrepancies, processes are being improved to ensure the accuracy improves. 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 |
|---|---|---|
| No comment provided | | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.<br><br>Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy | Ongoing | |

| Volume information accuracy | |
|---|---|
| **Non-compliance** | **Description** |
| Audit Ref: 3.2<br>With: Clause 15.2 and 15.37B(c)<br><br>From: 30-Apr-21<br>To: 05-Apr-22 | The variance of wattage values between the SLV system and RAMM is calculated to be 414,131.54 kWh per annum. I have not considered this in the audit risk rating as RAMM is less accurate, but the more accurate SLV is being used for submission.<br><br>Over submission because of dimming being used. The impact on submission is unknown.<br><br>185 items of load with zero or blank wattage recorded indicating potential under submission of 39,507 kWh.<br><br>491 items of load with the incorrect ballast recorded resulting in an estimated over submission of 23,540 kWh per annum.<br><br>Items of load for NSP STG0111 recorded against the incorrect ICP resulting in an estimated 20,586.22 kWh per annum being reconciled to the wrong network.<br><br>Metered streetlights on embedded networks NSP WHA0011, CMW0011, KUA0011, ORA0011 and BJL0011 incorrectly reconciled as unmetered load resulting in an estimated over submission of 96,674.78 kWh per annum.<br><br>856 metered or solar items of load recorded against unmetered ICPs resulting in an estimated over submission of 332,284.65 kWh per annum.<br><br>107 items of load recorded against the incorrect ICP, NSP and network.<br><br>There is a 95% level of confidence that the annual consumption is between 1,772,300 kWh p.a. lower to 1,824,300 kWh p.a. higher than the database indicates.<br><br>Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month.<br><br>Potential impact: High<br><br>Actual impact: High<br><br>Audit history: Multiple times<br><br>Controls: Moderate<br><br>Breach risk rating: 6 |
| **Audit risk rating** | **Rationale for audit risk rating** |
| **High** | The controls are rated as moderate, as the processes in place will mitigate risk to an acceptable level and once submission is derived from the SLV system this should move to strong.<br><br>The audit risk rating is high due to the indicative kWh variances found for those that can be quantified. |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|---|---|
| Meridian is working with Auckland Transport to determine whether eligibility criteria for recently approved profiles can be met with the SLV system or whether a further profile for the dimming lights will be necessary.<br><br>Meridian has notified Auckland Transport of the discrepancies and required corrections. Auckland Transport has advised that they will be conducting site visits and will work on corrections over the next 2 months. There has been a dedicated resource allocated. | Ongoing<br><br>1/7/2022 | Identified |
| **Preventative actions taken to ensure no further issues will occur** | **Completion date** | |
| Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.<br><br>Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy | Ongoing | |