

## Compliance plan for Palmerston North CC (Meridian) – 2022

Distributed unmetered load audits			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F  From: 26-May-21 To: 30-May-22	The audit was not completed by the due date.  Potential impact: High Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	Controls are assessed to be weak as the audit was one year overdue. Meridian delayed the audit in an effort to resolve the known non-compliances before the next audit was completed.  The impact is assessed to be low, because completing the audit earlier was unlikely to impact on compliance.		
Actions taken to resolve the issue		Completion date	Remedial action status
Meridian delayed the audit of this database while attempting to resolve the substantive issue regarding dimmable lights.  Following consultation with the Authority the audit was undertaken to resolve non-compliance with 16A.26 and 17.295F.		30/05/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Deriving submission information	
Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	The database information used to calculate submissions is not accurate within $\pm 5\%$ .  Six lights in North St, Ashhurst (Slim pole IDs 12657-12662) have a blank ICP group and total 600W. The lights have been connected since May 2022.  Lamp wattages have been adjusted down to account for dimming for 3,932 lights, which could result in under submission of 22,244W or 95,004 kWh per annum.  Lamp wattages differed from expected values for a further 883 lights, which could result in over submission of 5,135W or 21,934 kWh per annum.

<p>From: 01-Mar-22 To: 23-Apr-22</p>	<p>17 lights have incorrect gear wattages, which PNCC intends to correct. The impact of the incorrect gear wattages is 18.8W, which could lead to over submission of 80 kWh per annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
<p><b>Audit risk rating</b></p>	<p><b>Rationale for audit risk rating</b></p>		
<p><b>Medium</b></p>	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is medium. The majority of the database inaccuracies relate to dimmed lights, and the method used to calculate the dimmed wattages provides a reasonable estimate of the true wattage. Until a dimming profile is applied, use of the full wattage would result in over submission.</p>		
<p><b>Actions taken to resolve the issue</b></p>	<p><b>Completion date</b></p>	<p><b>Remedial action status</b></p>	
<p>Palmerston North City Council advises the 6 lights in North Street, Ashhurst are now connected to the Powerco network and are recorded in our RAMM Database.</p> <p>Meridian is working with Palmerston North City Council to meet the requirement of the LGS profile so this can be used for the dimming lights. Palmerston North City Council advises they are in the process of meter installations.</p> <p>Meridian advised Palmerston North City Council regarding the 883 lights. Palmerston North City Council advise the 2 x LED CRI 80 3000K 14W have been corrected in the database. The 75 x Road Grace BRP711 30LED26W are covered in the dimming profile. The remaining 806 lights are confirmed as correct.</p> <p>Palmerston North City Council confirm that the 17 lights with incorrect gear wattages have been corrected in the RAMM Database.</p>	<p>15/6/2022</p> <p>1/12/2022</p> <p>15/6/2022</p> <p>15/6/2022</p>	<p>Identified</p>	
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>		
<p>Meridian will continue to work with and follow up with Palmerston North City Council in setting up the dimming lights profile.</p>	<p>1/12/2022</p>		

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3  From: 01-May-22 To: 25-May-22	Six lights in North St, Ashhurst (Slim pole IDs 12657-12662) have a blank ICP group and total 600W. The lights have been connected since May 2022.  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 moderate, as almost all ICPs which should be recorded against DUML ICPs had the correct ICP recorded. The exceptions appear to be caused by a delay in updating the database for these newly connected lights.  The audit risk rating is low because 1) the lights were connected within the last month and 2) the unmetered volume is small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Palmerston North City Council advises the 6 lights in North Street, Ashhurst are now connected to the Powerco network and are recorded in our RAMM Database.	15/6/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
The Council and contractor processes to keep the database up to date with changes are generally robust	Ongoing	

All load recorded in database	
Non-compliance	Description
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 22-Apr-22 To: 25-May-22	Two lights on Ruamahanga Crescent which were not recorded in the database: L46 lights outside street numbers 17 (pole L13490) and 111 (pole L13493).  Six lights in North St, Ashhurst (Slim pole IDs 12657-12662) have a blank ICP group and total 600W. The lights have been connected since May 2022.  Potential impact: Medium  Actual impact: Low  Audit history: None  Controls: Moderate  Breach risk rating: 2

Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls over the completeness of database information are assessed to be moderate because the differences are recent changes and are expected to be timing differences.</p> <p>The impact is low, based on the wattages.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Palmerston North City Council confirm that the 2 lights on Ruamahanga Crescent have now been added to the RAMM Database.</p> <p>Palmerston North City Council advises the 6 lights in North Street, Ashhurst are now connected to the Powerco network and are recorded in our RAMM Database.</p>		15/6/2022	Identified
<p>Preventative actions taken to ensure no further issues will occur</p>		15/6/2022	
<p>The Council and contractor processes to keep the database up to date with changes are generally robust</p>		Ongoing	

Database accuracy	
Non-compliance	Description
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)  From: 01-Mar-22 To: 25-May-22</p>	<p>The database information used to calculate submissions is not accurate within ±5%.</p> <p>Lamp wattages have been adjusted down to account for dimming for 3,932 lights, which could result in under submission of 22,244W or 95,004 kWh per annum.</p> <p>Lamp wattages differed from expected values for a further 883 lights, which could result in over submission of 5,135W or 21,934 kWh per annum.</p> <p>17 lights have incorrect gear wattages, which PNCC intends to correct. The impact of the incorrect gear wattages is 18.8W, which could lead to over submission of 80 kWh per annum.</p> <p>The road name recorded for Slim Pole IDs 9284 and 9285 is COLYTON RD_A but is expected to be Oxford Street.</p> <p>Six lights in North St, Ashhurst (Slim pole IDs 12657-12662) have a blank ICP group and total 600W. The lights have been connected since May 2022.</p> <p>Potential impact: High Actual impact: High Audit history: Three times Controls: Weak Breach risk rating: 6</p>

Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is medium. The majority of the database inaccuracies relate to dimmed lights, and the method used to calculate the dimmed wattages provides a reasonable estimate of the true wattage. Until a dimming profile is applied, use of the full wattage would result in over submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Meridian is working with Palmerston North City Council to meet the requirement of the LGS profile so this can be used for the dimming lights. Palmerston North City Council advises they are in the process of meter installations.</p> <p>Meridian advised Palmerston North City Council regarding the 883 lights. Palmerston North City Council advise the 2 x LED CRI 80 3000K 14W have been corrected in the database. The 75 x Road Grace BRP711 30LED26W are covered in the dimming profile. The remaining 806 lights are confirmed as correct.</p> <p>Palmerston North City Council confirm that the 17 lights with incorrect gear wattages have been corrected in the RAMM Database.</p> <p>Palmerston North City Council advise the name has been corrected from Colyton Road to Oxford Street in the RAMM Database.</p> <p>Palmerston North City Council advises the 6 lights in North Street, Ashhurst are now connected to the Powerco network and are recorded in our RAMM Database.</p>		<p>1/12/2022</p> <p>15/6/2022</p> <p>15/6/2022</p> <p>15/6/2022</p> <p>15/6/2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Meridian will continue to work and follow up with Palmerston North City Council in setting up the dimming lights profile.</p>		<p>1/12/2022</p>	

Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p>	<p>The database information used to calculate submissions is not accurate within <math>\pm 5\%</math>.</p> <p>Six lights in North St, Ashhurst (Slim pole IDs 12657-12662) have a blank ICP group and total 600W. The lights have been connected since May 2022.</p> <p>Lamp wattages have been adjusted down to account for dimming for 3,932 lights, which could result in under submission of 22,244W or 95,004 kWh per annum.</p>

<p>From: 01-Mar-22 To: 23-Apr-22</p>	<p>Lamp wattages differed from expected values for a further 883 lights, which could result in over submission of 5,135W or 21,934 kWh per annum.</p> <p>17 lights have incorrect gear wattages, which PNCC intends to correct. The impact of the incorrect gear wattages is 18.8W, which could lead to over submission of 80 kWh per annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times Controls: Weak Breach risk rating: 6</p>	
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<p><b>Medium</b></p>	<p>The controls over the database are rated as weak, due to the large number of discrepancies identified during the field count and analysis of the RAMM database extract.</p> <p>The audit risk rating is medium. The majority of the database inaccuracies relate to dimmed lights, and the method used to calculate the dimmed wattages provides a reasonable estimate of the true wattage. Until a dimming profile is applied, use of the full wattage would result in over submission.</p>	
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