

Compliance plan for Kapiti Retirement Trust DUML – 2022

Participants to give access			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 01-Mar-21 To: 14-Nov-22	The audit was not completed by the due date. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak because Contact were not actively monitoring the audit due dates. The audit risk rating is low because though the information was not provided in time for the audit to be completed before its due date, the volume impact relatively small.		
Actions taken to resolve the issue		Completion date	Remedial action status
Audit has been finalised		16/12/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This ICP is switching to Simply Energy 1 January 2023		1/1/2023	

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-Mar-21 To: 14-Nov-22	Submissions are not calculated using current spreadsheet information. The spreadsheet is not accurate within $\pm 5.0\%$. Lamp installation, change, and removal dates are not recorded in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: Twice Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as none, because no attempt was made to request or receive an updated spreadsheet from KRT since the last DUML audit. The impact is low: <ul style="list-style-type: none"> the wattage differences could result in estimated under reporting of approximately 4,069.8 kWh per annum if the current database information was used for submission, the spreadsheet contains 39 items of load and 2,022W, changes are infrequent, and occur mainly when faulty lights are replaced, and the difference between the actual wattage found in the field and wattage applied for submission is small. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Updated information has now been received and will be used in submission going forward	1/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.	1/1/2023	

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-Mar-21 To: 14-Nov-22	The ICP number is not recorded in the spreadsheet or spreadsheet name. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate and there is not expected to be any impact because the spreadsheet is clearly named, and all items of load relate to ICP 0015768900ELB35.	
Actions taken to resolve the issue		Completion date
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023
Preventative actions taken to ensure no further issues will occur		Completion date
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023
Remedial action status		
Identified		

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Mar-21 To: 14-Nov-22	Two items of load not recorded in the database of the sample of 39 items of load checked. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate as Contact has not requested an updated spreadsheet from KRT since the last audit. 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
Updated records are now being used in submission		1/11/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023	

Tracking of load changes			
Non-compliance	Description		
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: 01-Mar-21 To: 14-Nov-22	Lamp installation, change, and removal dates are not recorded in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as weak because installation, change and removal dates are not recorded, and it is not possible to derive the load in kW for any given day. The impact is low, because the spreadsheet contains 39 items of load and 2,022W. Changes are infrequent and occur mainly when faulty lights are replaced.		
Actions taken to resolve the issue		Completion date	Remedial action status
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 01-Mar-21 To: 14-Nov-22	The spreadsheet does not contain an audit trail. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong and the impact as low, because all the information required to meet the audit trail requirements is available, although it is not formally recorded within the spreadsheet.	
Actions taken to resolve the issue	Completion date	Remedial action status
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.	1/1/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.	1/1/2023	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Mar-21</p> <p>To: 14-Nov-22</p>	<p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 3,100 kWh p.a.</p> <p>Lamp installation, change, and removal dates are not recorded in the spreadsheet.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak, because they are not sufficient to ensure that data for most lamps is recorded correctly.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> the wattage differences could result in estimated over reporting of approximately 3,100 kWh per annum (35% of current database load) if the current database information was used for submission, and the spreadsheet contains 39 items of load and 2,022W, changes are infrequent, and occur mainly when faulty lights are replaced. 	
Actions taken to resolve the issue		Completion date
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023
Preventative actions taken to ensure no further issues will occur		Completion date
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.		1/1/2023
Remedial action status		
Identified		

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-Mar-21</p> <p>To: 14-Nov-22</p>	<p>Submissions are not calculated using current spreadsheet information.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 3,100 kWh p.a.</p> <p>Lamp installation, change, and removal dates are not recorded in the spreadsheet.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak, because they are not sufficient to ensure that data for most lamps is recorded correctly.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> the wattage differences could result in estimated over reporting of approximately 3,100 kWh per annum (35% of current database load) if the current database information was used for submission, the spreadsheet contains 39 items of load and 2,022W, changes are infrequent, and occur mainly when faulty lights are replaced, and the difference between the actual wattage found in the field and wattage applied for submission is small. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Updated records have now been received and are being used in submission	1/11/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
This ICP is switching to Simply Energy 1 January 2023, who will engage KRT to put in place a new database management and reporting process.	1/1/2023	