

Compliance plan for Kawerau DC DUML GENE 2022

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 From: 01-Jun-22 To: 18-Aug-22	Audit report not completed by due date. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as a new person has been appointed to the DUML management position and is actively working to get audits completed on time. The impact is assessed to be medium there has been no improvement in the database accuracy resulting in continued inaccurate submissions.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis Energy has appointment a DUML Data & Stakeholder Lead to provide information	01/09/2022	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	01/09/2022	

Participants to give access		
Non-compliance	Description	
Audit Ref: 1.11 With: Clause 16A.4 From: 16-May-22 To: 18-Aug-22	Information was not provided within 15 business days of the request. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as no information was provided despite multiple requests. The impact is assessed to be low as the information was eventually provided.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis Energy has appointment a DUMML Data & Stakeholder Lead to provide information and avoid delays	01/09/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis Energy has appointment a DUMML Data & Stakeholder Lead to provide information and avoid delays	01/09/2022	

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>Clause 11(1) of Schedule 15.3</p> <p>From: 25-Nov-21</p> <p>To: 18-Aug-22</p>	<p>Actual on and off times not used to calculate consumption.</p> <p>Total annual consumption is estimated to be 14,800 kWh lower than the DUML database indicates, based on the field audit.</p> <p>The RAMM database is not being updated with changes made in the field.</p> <p>None of the discrepancies from the last two audits have been updated in the database including adding the lights on Anaru Drive into the database.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak because quality control of the database accuracy is not evident, and no progress has been made since the last audit.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis will investigate options to use accurate on and off times. Genesis Energy has discussed the discrepancies that are still outstanding and needing to be corrected with the council with an intent that KDC takes every effort to have this rectified.</p>		01/03/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis Energy will review the dataset and provide exceptions where required. Genesis relies on KDC to accurately maintain its database.</p>		01/03/2023	

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-Jun-21 To: 18-Aug-22	Blank ICP field for two items of load. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak. The data quality indicates a lack of quality control to check the data being loaded. The impact is assessed to be low based on the low proportion of missing ICPs.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised KDC of the discrepancy with the intent that KDC undertakes a full audit and updates all missing details.	01/03/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with the council to gain accuracy levels within their database.	01/03/2023	

Description and capacity of each item of load		
Non-compliance	Description	
Audit Ref: 2.4 Clause 11(2)(c)&(d) of Schedule 15.3 From: 01-Jun-21 To: 18-Aug-22	Lamp and gear wattage fields not provided for the audit. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak the data quality indicates a lack of quality control to check the data being managed. The impact is assessed to be low based on the low proportion of missing data.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised KDC of the discrepancy with the intent that KDC provides the required information	01/03/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has reviewed the auditors finding and have advised KDC of the discrepancy with the intent that KDC provides the required information. Genesis relies on KDC to provide accurate information	01/03/2023	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jun-21</p> <p>To: 18-Aug-22</p>	<p>Database accuracy is outside the allowable +/-5% threshold resulting in an estimated over submission of 14,800 kWh per annum.</p> <p>Lamp and gear wattages not provided for the audit.</p> <p>Two items of load without ICPs.</p> <p>Festive lighting is connected but the volume is not recorded.</p> <p>The RAMM database is not being updated with changes made in the field.</p> <p>None of the discrepancies from the last two audits have been updated in the database including adding the lights on Anaru Drive into the database.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak because quality control of the database accuracy is not evident and no progress has been made since the last audit.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis Energy has advised council of the auditor's findings regarding missing information, with the intent that the council makes every effort to ensure that exceptions are rectified		01/03/2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to work with the council to increase accuracy levels within their database. Genesis relies on KDC to accurately maintain its database.		Continuous Improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>Clause 15.2 and 15.37B(c)</p> <p>From: 25-Nov-21</p> <p>To: 18-Aug-22</p>	<p>Actual on and off times not used to calculate consumption.</p> <p>Total annual consumption is estimated to be 14,800 kWh lower than the DUML database indicates, based on the field audit.</p> <p>The RAMM database is not being updated with changes made in the field.</p> <p>None of the discrepancies from the last two audits have been updated in the database including adding the lights on Anaru Drive into the database.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as weak because quality control of the database accuracy is not evident.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>	
Actions taken to resolve the issue		Completion date
Genesis will investigate options to use accurate on and off times. Genesis Energy has discussed the discrepancies that are still outstanding and needing to be corrected with the council with an intent that KDC takes every effort to have this rectified.		01/03/2023
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis Energy will review the dataset and provide exceptions where required. Genesis relies on KDC to accurately maintain its database.		01/03/2023
		Remedial action status
		Investigating