

Compliance plan for Wellington CC DUML 2022

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Sep-21</p> <p>To: 30-Sep-22</p>	<p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> • 294,400 kWh per annum under submission from field audit, • 7,117 per annum under submission due to incorrect lamp or gear wattages, • 2,776 kWh per annum under submission due to missing lamp or gear wattages, and • 1,811,553 kWh per annum over submission due to static dimming adjustment not applied to submission capacities. • Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low. <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1.</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
<p>We will revise Jul – Sept submissions using capacities with static dimming adjustment applied and will use the adjusted capacities for submission calcs going forward.</p> <p>WCC have been provided audit findings for resolution.</p>	<p>28 Feb 2023</p> <p>25 Oct 2022</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>We will be discussing with WCC operational requirements for use of approved static dimming profile and progress made to date on meter installations etc.</p>	<p>30 Nov 2023</p>	
<p>We will continue to work with WCC to implement an approved method of settlement for dimming lights and follow up re database corrections required and improvements to maintenance processes for changes and new connections.</p>	<p>Ongoing</p>	

Location of each item of load		
Non-compliance	Description	
<p>Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Sep-21 To: 30-Sep-22</p>	<p>64 items of load do not have GPS coordinates or street numbers. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Low</p>	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>WCC have been provided audit findings for resolution.</p>	<p>25 Oct 2022</p>	<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We will continue to follow up with WCC re database corrections required and improvements to maintenance processes for changes and new connections.</p>	<p>Ongoing</p>	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: Clauses 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 01-Sep-21</p> <p>To: 30-Sep-22</p>	<p>Some description and capacity information is incomplete or unknown, including:</p> <ul style="list-style-type: none"> • 76 lamps with unknown or blank lamp descriptions, and • 57 gear wattages discrepancies. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate, as they are sufficient to ensure that almost all items of load have wattage and description information recorded.</p> <p>The impact is estimated to be low, based on the information available.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
WCC have been provided audit findings for resolution.		25 Oct 2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to follow up with WCC re database corrections required and improvements to maintenance processes for changes and new connections.		Ongoing	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clauses 11(2A) of Schedule 15.3 From: 01-Sep-21 To: 30-Sep-22	38 additional lamps in the field were not recorded in the database from a sample of 554 items of load. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, as they are sufficient to ensure that the majority of items of load are recorded in the database. The impact is estimated to be low, based on the information available.		
Actions taken to resolve the issue		Completion date	Remedial action status
WCC have been provided audit findings for resolution.		25 Oct 2022	
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to follow up with WCC re database corrections required and improvements to maintenance processes for changes and new connections.		Ongoing	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Sep-21</p> <p>To: 30-Sep-22</p>	<p>The database accuracy is assessed to be 105.1% of the database for the sample checked indicating a potential under submission of approximately 294,400 kWh per annum.</p> <p>205 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer's specifications available. The impact of these differences is estimated to be approximately 7,117 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>Field audit identified 118 items of load that have incorrect wattages, leading to under submission by 3,242 kWh per annum.</p> <p>Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as weak, because they are not sufficient to ensure that database wattage is consistently accurate.</p> <p>The impact is assessed to be medium based on the wattage differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
WCC have been provided audit findings for resolution.		25 Oct 2022	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<ul style="list-style-type: none"> We will continue to follow up with WCC re database corrections required and improvements to maintenance processes for changes and new connections. 		Ongoing	

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 used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> 294,400 kWh per annum under submission from field audit,

<p>From: 01-Sep-21 To: 30-Sep-22</p>	<ul style="list-style-type: none"> • 7,117 per annum under submission due to incorrect lamp or gear wattages, • 2,776 kWh per annum under submission due to missing lamp or gear wattages, and • 1,811,553 kWh per annum over submission due to static dimming adjustment not applied to submission capacities. • Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low. <p>Potential impact: High Actual impact: High Audit history: Three times Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<p>High</p>	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1.</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
<p>We will revise Jul – Sept submissions using capacities with static dimming adjustment applied and will use the adjusted capacities for submission calcs going forward.</p> <p>WCC have been provided audit findings for resolution.</p>	<p>28 Feb 2023 25 Oct 2022</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We will be discussing with WCC operational requirements for use of approved static dimming profile and progress made to date on meter installations etc.</p> <p>We will continue to work with WCC to implement an approved method of settlement for dimming lights and follow up re database corrections required and improvements to maintenance processes for changes and new connections.</p>	<p>30 Nov 2023 Ongoing</p>	