

Compliance Plan Stratford District Council DUML and Mercury Energy 2023

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 27-Jan-23 To: 02-Feb-23	Late provision of data resulted in the audit report being completed late. Potential impact: Medium Actual impact: Medium Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong because information was provided as soon as practicable once it was received. The impact is assessed to be low because Mercury advised the Authority of the issue and arranged for an extension.	
Actions taken to resolve the issue	Completion date	Remedial action status
There was relatively minor delay in receiving the wattage data but the main delay was caused by difficulties in identifying the correct logger.	January 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have taken some learnings from this experience and if/when DUML switches in to Mercury in the future we will hopefully be able to resolve these teething issues quicker.	Ongoing.	

Deriving submission information	
Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	No initial or r1 submission data was provided for October, November, or December 2022 because a database extract was not received in time. Submission data will be provided through the wash up process. 14 unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120W or 50.4 kWh p.a. Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 170W or 726 kWh p.a. 87 items of load do not have an ICP number recorded resulting in a potential estimated under submission of 24,096 kWh per annum. One item of load (light ID 1832) has an unknown lamp model, zero lamp wattage and zero gear wattage. One item of load (light ID 1832) has a blank lamp wattage. 22 items of load have a blank gear (total) wattage.

From: 30-Sep-22 To: 30-Sep-22	<p>Two 40W LED lights (light IDs 1559 and 1583) were recorded with total wattage of 81, but 40W was expected resulting in estimated over submission of 82 W or 350 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: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate because they ensure most information is accurate, and submissions will be provided on time now that database extracts are received. The impact is assessed to be medium based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have provided SDC with feedback and details of the specific discrepancies so that they can make the appropriate improvements and corrections.	February 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to liaise with SDC with the goal of improving their database accuracy.	Ongoing	

ICP identifier and items of load		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 28-May-21</p> <p>To: 30-Sep-22</p>	<p>87 items of load do not have an ICP number recorded resulting in a potential estimated under submission of 24,096 kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be medium based on the estimated kWh impact described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will follow up with SDC on their investigation.	February 2023	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
We will continue to liaise with SDC with the goal of improving their database accuracy.	Ongoing

Description and capacity of load	
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Non-compliance	Description
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 28-May-21</p> <p>To: 13-May-22</p>	<p>One item of load (light ID 1832 connected to 0089352004PCE32) has an unknown lamp model, zero lamp wattage and zero gear wattage.</p> <p>One item of load (light ID 1832 connected to 0089352004PCE32) has a blank lamp wattage.</p> <p>22 items of load connected to 0089352004PCE32 have a blank gear (total) wattage.</p> <p>A further 38 items of load with missing or blank ICP numbers had missing descriptions, lamp and/or gear (total) wattages.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>

Audit risk rating	Rationale for audit risk rating
Low	Controls are rated as moderate because most lamps have a valid lamp and total wattage recorded but there is room for improvement. The impact is assessed to be low on the estimated kWh impact of the items of load connected to settled ICPs.

Actions taken to resolve the issue	Completion date	Remedial action status
We have provided SDC with feedback and details of the specific discrepancies so that they can make the appropriate improvements and corrections.	February 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to liaise with SDC with the goal of improving their database accuracy.	Ongoing	

All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3</p> <p>From: 30-Sep-22 To: 30-Sep-22</p>	<p>Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 170W or 726 kWh p.a.</p> <p>14 unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of at least 120W or 50.4 kWh p.a.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times previously</p> <p>Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>A control rating of moderate was selected, because the controls over the inclusion of Christmas and decorative lights are weak but will improve to strong once the lights have been added to the database.</p> <p>The impact is assessed to be low based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We have provided SDC with feedback and details of the specific discrepancies so that they can make the appropriate improvements and corrections.	February 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to liaise with SDC with the goal of improving their database accuracy.	Ongoing	

Database accuracy	
Non-compliance	Description
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)</p>	<p>87 items of load do not have an ICP number recorded resulting in a potential estimated under submission of 24,096 kWh per annum.</p> <p>One item of load (light ID 1832) has an unknown lamp model, zero lamp wattage and zero gear wattage.</p> <p>One item of load (light ID 1832) has a blank lamp wattage.</p> <p>22 items of load have a blank gear (total) wattage.</p> <p>Two 40W LED lights (light IDs 1559 and 1583) were recorded with total wattage of 81, but 40W was expected resulting in estimated over submission of 82 W or 350 kWh per annum.</p> <p>14 unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120W or 50.4 kWh p.a.</p> <p>Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 170W or 726 kWh p.a.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Multiple times previously</p>

From: 30-Sep-22 To: 30-Sep-22	Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	A control rating of moderate was selected, because the controls over the inclusion of Christmas and decorative lights are weak but will improve to strong once the lights have been added to the database. The impact is assessed to be medium based on the kWh differences described above.	
Actions taken to resolve the issue	Completion date	Remedial action status
We have provided SDC with feedback and details of the specific discrepancies so that they can make the appropriate improvements and corrections.	February 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to liaise with SDC with the goal of improving their database accuracy.	Ongoing	

Volume information accuracy	
Non-compliance	Description
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) From: 30-Sep-22 To: 30-Sep-22	No initial or r1 submission data was provided for October, November, or December 2022 because a database extract was not received in time. Submission data will be provided through the wash up process. 14 unmetered Christmas lights are not recorded in RAMM. This may result in estimated under submission of 120W or 50.4 kWh p.a. Ten unmetered decorative lights are not recorded in RAMM. This may result in estimated under submission of 170W or 726 kWh p.a. 87 items of load do not have an ICP number recorded resulting in a potential estimated under submission of 24,096 kWh per annum. One item of load (light ID 1832) has an unknown lamp model, zero lamp wattage and zero gear wattage. One item of load (light ID 1832) has a blank lamp wattage. 22 items of load have a blank gear (total) wattage. Two 40W LED lights (light IDs 1559 and 1583) were recorded with total wattage of 81, but 40W was expected resulting in estimated over submission of 82 W or 350 kWh per annum. The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4

Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate because they ensure most information is accurate, and submissions will be provided on time now that database extracts are received. The impact is assessed to be medium based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have provided SDC with feedback and details of the specific discrepancies so that they can make the appropriate improvements and corrections.		February 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to liaise with SDC with the goal of improving their database accuracy.		Ongoing	