Compliance plan for Auckland Transport and Meridian Energy (January 2023)

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: 11(1) of Schedule 15.3	The variance of wattage values between the SLV system and RAMM is calculated be 237,955 kWh per annum. I have not considered this in the audit risk rating at RAMM is less accurate, but the more accurate SLV is being used for submission.		the audit risk rating as
	Over submission because of dimming be unknown.	ing used. The imp	act on submission is
	850 items of load with no ICP recorded indicating a potential under submission of 174,631 kWh per annum.		
	Incorrect wattages applied based on lam resulting in an estimated over submissio		
	Incorrect ballasts applied to some items over submission of 5,166 kWh per annur		resulting in an estimated
	Seven embedded networks with unmetered streetlights incorrectly allocated to a LE ICP resulting in an estimated under submission of 13,594 kWh for since Octobe 2022.		
	Four LE ICPs with load allocated are still to be investigated to determine if these are Auckland Transport items of load and are metered or not, potentially resulting in an estimated under submission of 6,753 kWh per annum.		
	156 metered or solar items of load recorded against unmetered ICPs resulting in an estimated over submission of 54,245 kWh per annum.		
	Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month.		
	Potential impact: High		
From: 06-Apr-22	Actual impact: High		
To: 15-Nov-22	Audit history: Multiple times		
	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate. The accuracy of the database has improved, and processes continue to be strengthened to ensure accuracy.		
	The audit risk rating is high due to the indicative kWh variances found for those that can be quantified.		
Actions to	aken to resolve the issue	Completion date	Remedial action status
	Meridian has continued to work with Auckland Transport, Smart power and Veritek toward use of an approved profile for dimming		

lights. Following a meeting in Nov 22 we are awaiting information from AT to progress this.	
Auckland Transport has been notified of the database discrepancies identified during this audit and required corrections. Auckland Transport has advised that they are continuing investigation and site visits and will continue to work on making corrections to the database.	31/03/2023
Meridian will revise historic submissions for embedded networks with unmetered lights back to Oct 22 to correct the under	31/05/2023
submission due to incorrect allocation of the LE ICP.	
Preventative actions taken to ensure no further issues will occur	Completion date
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ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2 With: 11(2)(a) of Schedule 15.3	850 items of load with no ICP recorded indicating a potential under submission of 174,631 kWh per annum. Potential impact: High Actual impact: High Audit history: Once previously		
From: 06-Apr-22	Controls: Moderate		
To: 15-Nov-22	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate. ICP allocation of new load has robust controls but there is still some data cleansing to be done of historical data. The audit risk rating is high due to potential submission against the incorrect NSP		
	and balancing area having a direct impact on settlement		
Actions taken to resolve the issue Completion Remedial action status date			
Auckland Transport has been notified of the database discrepancies identified during this audit and required corrections. Auckland Transport has advised that they are continuing investigation and site visits and will continue to work on making corrections to the database.		31/03/2023	Identified

Preventative actions taken to ensure no further issues will occur	Completion date
Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.	Ongoing

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: 11(2)(c) and (d) of	591 items of load with zero or blank wattage recorded indicating a potential under submission of 126,208 kWh per annum		
Schedule 15.3	Potential impact: High		
	Actual impact: High		
	Audit history: Multiple times		
From: 06-Apr-22	Controls: Moderate		
To: 15-Nov-22	Breach risk rating: 6		
Audit risk rating	Rationale for	audit risk rating	
High	The controls are rated as moderate. The accuracy of the database has improved, and processes continue to be strengthened to ensure accuracy.		
	The audit risk rating is high due to potential impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
Auckland Transport has been notified of the database discrepancies identified during this audit and required corrections. Auckland Transport has advised that they are continuing investigation and site visits and will continue to work on making corrections to the database.		31/03/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.		Ongoing	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3	22 additional lights found in the field or 2% of the load sampled. Potential impact: High Actual impact: Medium Audit history: Multiple times	
From: 06-Apr-22		

To: 16-Nov-22	Controls: Moderate Breach risk rating: 4
Audit risk rating	Rationale for audit risk rating
Medium	The controls are recorded as moderate as they will mitigate risk most of the time but there is room for improvement. The audit risk rating is medium as the number of additional lights found in the field was 2% of the overall sample checked which would potentially have a medium impact on reconciliation accuracy for this large database.

Actions taken to resolve the issue	Completion date	Remedial action status
Auckland Transport has been notified of the database discrepancies identified during this audit and required corrections. Auckland Transport has advised that they are continuing investigation and site visits and will continue to work on making corrections to the database.	31/03/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.	Ongoing	

Database accuracy	
Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and	Incorrect wattages applied based on lamp description for 60 lamp types recorded resulting in an estimated over submission of 379,238 kWh per annum.
15.37B(b)	Incorrect ballasts applied to some items of load recorded resulting in an estimated over submission of 5,166 kWh per annum.
	850 items of load with no ICP recorded indicating a potential under submission of 174,631 kWh per annum.
	Seven embedded networks with unmetered streetlights incorrectly allocated to an LE ICP resulting in an estimated under submission of 13,594 kWh for since October 2022.
	Four LE ICPs with load allocated are still to be investigated to determine if these are Auckland Transport items of load and are metered or not, potentially resulting in an estimated under submission of 6,753 kWh per annum.
	156 metered or solar items of load recorded against unmetered ICPs resulting in an estimated over submission of 54,245 kWh per annum.
	Potential impact: High
	Actual impact: High
	Audit history: Multiple times
From: 06-Apr-22	Controls: Moderate

To: 15-Nov-22	Breach risk rating: 6
Audit risk rating	Rationale for audit risk rating
High	The controls are rated as moderate. The accuracy of the database has improved and processed continue to be strengthened to ensure the accuracy. The impact is assessed to be high, based on the kWh differences described above.

Actions taken to resolve the issue	Completion date	Remedial action status
Auckland Transport has been notified of the database discrepancies identified during this audit and required corrections. Auckland Transport has advised that they are continuing investigation and site visits and will continue to work on making corrections to the database.	31/03/2023	Identified
Meridian will revise historic submissions for embedded networks with unmetered lights back to Oct 22 to correct the under submission due to incorrect allocation of the LE ICP.	31/05/2023	
Preventative actions taken to ensure no further issues will occur	Completion date	
Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.	Ongoing	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	The variance of wattage values between the SLV system and RAMM is calculated to be 237,955 kWh per annum. I have not considered this in the audit risk rating as RAMM is less accurate, but the more accurate SLV is being used for submission.	
13.375(c)	Over submission because of dimming being used. The impact on submission is unknown.	
	850 items of load with no ICP recorded indicating a potential under submission of 174,631 kWh per annum.	
	Incorrect wattages applied based on lamp description for 60 lamp types recorded resulting in an estimated over submission of 379,238 kWh per annum.	
	Incorrect ballasts applied to some items of load recorded resulting in an estimated over submission of 5,166 kWh per annum.	
	Seven embedded networks with unmetered streetlights incorrectly allocated to an LE ICP resulting in an estimated under submission of 13,594 kWh for since October 2022.	
	Four LE ICPs with load allocated are still to be investigated to determine if these are Auckland Transport items of load potentially resulting in an estimated under submission of 6,753 kWh per annum.	
	156 metered or solar items of load recorded against unmetered ICPs resulting in an estimated over submission of 54,245 kWh per annum.	

	Any changes that are made during any given month take effect from the beginning of that month. This process does not account for historic changes or changes within a month.			
From: 06-Apr-22 To: 15-Nov-22	Potential impact: High			
	Actual impact: High			
	Audit history: Multiple times			
	Controls: Moderate			
	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as moderate. The accuracy of the database has improved, and processes continue to be strengthened to ensure accuracy.			
	The audit risk rating is high due to the indicative kWh variances found for those that can be quantified.			
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Actions taken to resolve the issue	Completion date	Remedial action status
Meridian has continued to work with Auckland Transport, Smart power and Veritek toward use of an approved profile for dimming lights. Following a meeting in Nov 22 we are awaiting information from AT to progress this.	Oct 2023	Identified
Auckland Transport has been notified of the database discrepancies identified during this audit and required corrections. Auckland Transport has advised that they are continuing investigation and site visits and will continue to work on making corrections to the database.	31/03/2023	
Meridian will revise historic submissions for embedded networks with unmetered lights back to Oct 22 to correct the under submission due to incorrect allocation of the LE ICP.	31/05/2023	
Preventative actions taken to ensure no further issues will occur	Completion date	
Meridian will continue to work with Auckland Transport regularly to ensure continued improvements on the database and that corrections are up to date.	Ongoing	
Once there is an approved profile for the dimming lights and the SLV System Output is used for submission, there will be significant improvement on accuracy		