## Compliance plan for Otorohonga DC DUML Genesis 2022

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1 With: Clause 11(1) of	Festive lights are included throughout the year resulting in an estimated annual over submission of 812 kWh.			
Schedule 15.3	Some decorative and festive lights are not recorded in the database.			
	Submission is based on a snapshot and does not consider historic adjustments.			
	Potential impact: Low			
	Actual impact: Low			
	Audit history: Three times previously			
From: 12-Nov-20	Controls: Moderate			
To: 10-Oct-22	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as moderate but there is room for improvement.			
	The impact is assessed to be low based on the kWh impact to the market.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has discussed auditor's findings with ODC. ODC is going to carry out a site visit by mid-January to confirm the wattages and status of the festive and decorative lights. Once done RAMM will be updated accordingly. Genesis has discussed the importance of tracking of change. ODC are happy to have a column added in their dataset for		20/01/2023	Investigating	
"Lamp Replaced Date"				
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will continue to work with the council to increase accuracy levels in their database.		Continuous Improvement		

All load recorded in database					
Non-compliance	Description				
Audit Ref: 2.5	One additional item of load found in the field.				
With: Clause 11(2A) of	Some decorative and festive lights are not recorded in the database.				
Schedule 15.3	Potential impact: Low				
	Actual impact: Low				
	Audit history: Three times previously				
From: unknown	Controls: Weak Breach risk rating: 3				
To: 10-Oct-22					
Audit risk rating	Rationale for audit risk rating				
Low	The controls are rated as weak overall as the controls in place are not robust enough to ensure that all load is recorded in the database.				
	The impact is assessed to be low, as the kWh impact on reconciliation is expected to be small.				
Actions taken to resolve the issue		Completion date	Remedial action status		
Genesis has notified ODC of the additional item found in field and ODC will have this updated in RAMM.		20/01/2023	Investigating		
ODC is going to complete a site visit to confirm the status of decorative and festive lights. RAMM will be updated with findings.					
Preventative actions taken to ensure no further issues will occur		Completion date			
Genesis will continue to work with the council to increase accuracy levels in their database.		20/01/2023			

Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and	Incorrect ICP recorded against 128 items of load that are now being reconciled against the Waka Kotahi RAMM database.			
15.37B(b)	Festive lights are included throughout the year resulting in an estimated annual over submission of 812 kWh.			
	Some decorative and festive lights are not recorded in the database.			
	Potential impact: Low			
	Actual impact: Low			
From: 12-Nov-20 To: 10-Oct-22	Audit history: Multiple times			
	Controls: Weak			
Audit risk rating	Rationale for audit risk rating			
Low	Controls are rated as weak as the processes to manage change in the database were unclear and require review.			
	The impact is assessed to be low based on the kWh impact to the market.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has brought this to the attention of ODC and advised to use NZTA ICP 0008806768WM373 against NZTA's assets. Genesis has revised submissions back to April 2022 to reflect the same.		20/01/2023	Identified	
ODC is going to complete a site visit to confirm the status of decorative and festive lights. RAMM will be updated with findings.				
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis continues to work with the council to increase accuracy levels in their database.		20/01/2023		

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2 With: Clause 15.2 and	Festive lights are included throughout the year resulting in an estimated annual over submission of 812 kWh.			
15.37B(c)	Some decorative and festive lights are not recorded in the database.			
	Submission is based on a snapshot and does not consider historic adjustments.			
	Potential impact: Low			
	Actual impact: Low			
	Audit history: Three times previously			
From: 12-Nov-20	Controls: Moderate			
To: 05-May-22	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as moderate but there is room for improvement.			
	The impact is assessed to be low based on the kWh impact to the market.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has discussed auditor's findings with ODC. ODC is going to carry out a site visit by mid-January to confirm the wattages and status of the festive and decorative lights. Once done RAMM will be updated accordingly. Genesis has discussed the importance of tracking of change. ODC are happy to have a column added in their dataset for "Lamp Replaced Date"		20/01/2023	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will continue to work with the council to increase accuracy levels in their database.		Continuous Improvement		