

## Compliance plan for Horowhenua District Council – March 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p>           <p>From: 21-Sep-22</p> <p>To: 04-Oct-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence. There is a 95% level of confidence that the annual consumption is estimated to be between 55,300 kWh lower and 1,700 kWh higher than the database indicates.</p> <p>Two items of load (pole IDs CX0435 17W LED and DX0328 27W LED) had a blank lamp make, lamp model, lamp wattage and gear wattage in RAMM resulting in under submission of 187.9 kWh p.a.</p> <p>Four items of load do not have an ICP number recorded in RAMM totalling 88W or 375 kWh per annum. There is no impact on submission because the missing ICP numbers were populated before sending the database extracts to Contact.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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	
<b>Medium</b>	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be low, based on the low number of changes which occur in the database and the wattage differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Missing items added to RAMM during the audit	10.03.2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
HDC to look into making this field mandatory	10.03.2023	

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: 21-Sep-22</p> <p>To: 21-Sep-22</p>	<p>Four items of load connected to ICP 0016099004EL9CA had blank ICP numbers in RAMM and were updated to during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are strong because almost all items of load had valid ICP numbers recorded and RAMM was updated during the audit.</p> <p>There was no impact on submission. The missing ICP numbers were manually updated in the extract before it was sent to Contact and have now been updated in RAMM.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Missing items added to RAMM during the audit	10.03.2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
HDC to look into making this field mandatory	10.03.2023	

Description and capacity of load	
Non-compliance	Description
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 21-Sep-22</p> <p>To: 21-Sep-22</p>	<p>Two items of load (pole IDs CX0435 and DX0328) had a blank lamp make, lamp model, lamp wattage and gear wattage. The missing details were added during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>
Audit risk rating	Rationale for audit risk rating
<b>Low</b>	<p>The controls are strong because almost all items of load had lamp information recorded and RAMM was updated during the audit.</p> <p>The risk rating is assessed to be low because two items of load are affected, resulting in under submission of 44W or 187.9 kWh p.a.</p>

<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
Missing details were added during the audit	10.03.2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
HDC to look into making this field mandatory	10.03.2023	

<b>All load recorded in database</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 04-Oct-22 To: 04-Oct-22	One L22 (pole CX0153) outside 4 Mark Perreau Pl, Foxton is missing from the database. One unknown LED (estimated 17W) is missing from the database at Derby St, Levin. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Low</b>	Controls are rated as strong because the process is sufficient to ensure that most items of load are recorded in the database. The audit risk rating is assessed to be low because two lamps with an estimated total wattage of 39 W (or 167 kWh per annum) were missing. RAMM was corrected following the field audit.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
HDC confirmed missing details have been added to RAMM	10.03.2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	

<b>Database accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 21-Sep-22</p> <p>To: 04-Oct-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence. There is a 95% level of confidence that the annual consumption is estimated to be between 55,300 kWh lower and 1,700 kWh higher than the database indicates.</p> <p>Two items of load (pole IDs CX0435 17W LED and DX0328 27W LED) had a blank lamp make, lamp model, lamp wattage and gear wattage in RAMM resulting in under submission of 187.9 kWh p.a.</p> <p>Four items of load do not have an ICP number recorded in RAMM totalling 88W or 375 kWh per annum. There is no impact on submission because the missing ICP numbers were populated before sending the database extracts to Contact.</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: 4</p>	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Medium</b>	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be medium based on the kWh difference described above.</p>	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
HDC added missing details during audit	10.03.2023	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
HDC to look into making field mandatory	10.03.2023	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 21-Sep-22</p> <p>To: 04-Oct-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence. There is a 95% level of confidence that the annual consumption is estimated to be between 55,300 kWh lower and 1,700 kWh higher than the database indicates.</p> <p>Two items of load (pole IDs CX0435 17W LED and DX0328 27W LED) had a blank lamp make, lamp model, lamp wattage and gear wattage in RAMM resulting in under submission of 187.9 kWh p.a.</p> <p>Four items of load do not have an ICP number recorded in RAMM totalling 88W or 375 kWh per annum. There is no impact on submission because the missing ICP numbers were populated before sending the database extracts to Contact.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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	
<b>Medium</b>	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be low, based on the low number of changes which occur in the database and the wattage differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
HDC added missing details during audit	10.03.2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
HDC to look into making this field mandatory	10.03.2023	