

Compliance plan for Hutt CC DUML – 2023

Deriving submission information	
Non-compliance	Description
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Sep-22 To: 28-Feb-23</p>	<p>The database is not accurate within $\pm 5\%$. There is a 95% level of confidence that the annual consumption is between 513,000 kWh p.a. lower to 445,100 kWh p.a. higher than the database indicates.</p> <p>The power summary monthly report provided to Genesis Energy was missing mappings for 15 lamp models resulting in 577 lights being excluded from submission as these lights were not found in the wattage look up resulting in an under submission of 56,683 kWh p.a.</p> <p>LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.</p> <p>Where more than one light model field was populated, the lamp, gear and total wattage in most cases reflected the values for only one of the recorded light models and in some cases were inconsistent with the expected values for any of the models.</p> <p>Where only one light model field was populated, the recorded lamp and gear wattage did not always reflect the expected wattage for all lights connected to the listed pole.</p> <p>85 items of load do not have information populated in the light model fields. 53 of these had some information populated in the "If Other Light Type Pls Specify" field, and I confirmed that 42 had a wattage consistent with that description. 35 had insufficient information to confirm the correct wattages, and eight had wattages inconsistent with the description.</p> <p>29 poles had a zero-value wattage value when a non-zero value was expected.</p> <p>There is not a clear process to communicate festive light wattages and on and off dates to Genesis. Under submission is expected as festive lights wattages were not included in the January 2023 database extract provided to Genesis.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
High	<p>The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.</p> <p>The audit risk rating is high based on kWh variances identified.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
<p>HCC has been notified of the discrepancies. Genesis relies on HCC to accurately maintain its database.</p> <p>In regard to festive lights Genesis has advised Hutt CC to notify when the festive lights have been turned on/off.</p> <p>Genesis has advised Hutt CC that Genesis requires monthly extracts that track any changes within the month to meet the DUML regulations and track changes at a daily level.</p>	01/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis will send monthly reminders to HCC to provide the dataset. Genesis will continue to work with the council to help them increase database accuracy.</p>	Continuous Improvement	

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: 01-Sep-22</p> <p>To: 28-Feb-23</p>	<p>LED make and model details are not recorded in the database.</p> <p>85 items of load do not have information populated in the light model fields, and 32 of these also have no information populated in the "If Other Light Type Pls Specify" field.</p> <p>29 poles had a zero-value wattage value when a non-zero value was expected.</p> <p>Potential impact: Unknown</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak as wattages are not consistently populated, and there are no LED lamp makes and models recorded.</p> <p>The impact is assessed to be medium as the database does not have LED make and model recorded and the field audit indicates that the data is not accurate.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
HCC has been notified of the discrepancies. Genesis relies on HCC to accurately maintain its database.		01/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to work with the council to help them increase database accuracy.		Continuous Improvement	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-Sep-22 To: 28-Feb-23	Three additional lights found in the field. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as process to track changes is not capturing all changes made in the field. The impact is assessed to be low as there were only three additional lamps found in the sample checked.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised HCC of the discrepancy with the intent that HCC makes every effort to ensure the exceptions are rectified.	01/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will continue to work with the council to help them increase database accuracy.	Continuous Improvement	

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-22</p> <p>To: 28-Feb-23</p>	<p>The database is not accurate within $\pm 5\%$. There is a 95% level of confidence that the annual consumption is between 513,000 kwh p.a. lower to 445,100 kWh p.a. higher than the database indicates.</p> <p>The power summary monthly report provided to Genesis Energy was missing mappings for 15 lamp models resulting in 577 lights being excluded from submission as these lights were not found in the wattage look up resulting in an under submission of 56,683 kWh p.a.</p> <p>LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.</p> <p>Where more than one light model field was populated, the lamp, gear and total wattage in most cases reflected the values for only one of the recorded light models and in some cases were inconsistent with the expected values for any of the models.</p> <p>Where only one light model field was populated, the recorded lamp and gear wattage did not always reflect the expected wattage.</p> <p>85 items of load do not have information populated in the light model fields. 53 of these had some information populated in the "If Other Light Type Pls Specify" field, and I confirmed that 42 had a wattage consistent with that description. 35 had insufficient information to confirm the correct wattages, and eight had wattages inconsistent with the description.</p> <p>29 poles had a zero-value wattage value when a non-zero value was expected.</p> <p>There is not a clear process to communicate festive light wattages and on and off dates to Genesis. Under submission is expected as festive lights wattages were not included in the January 2023 database extract provided to Genesis.</p> <p>Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.</p> <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>The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.</p> <p>The audit risk rating is high based on kWh variances identified.</p>

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Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Sep-22 To: 28-Feb-23</p>	<p>The database is not accurate within $\pm 5\%$. There is a 95% level of confidence that the annual consumption is between 513,000 kwh p.a. lower to 445,100 kWh p.a. higher than the database indicates.</p> <p>The power summary monthly report provided to Genesis Energy was missing mappings for 15 lamp models resulting in 577 lights being excluded from submission as these lights were not found in the wattage look up resulting in an under submission of 56,683 kWh p.a.</p> <p>LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.</p> <p>Where more than one light model field was populated, the lamp, gear and total wattage in most cases reflected the values for only one of the recorded light models and in some cases were inconsistent with the expected values for any of the models.</p> <p>Where only one light model field was populated, the recorded lamp and gear wattage did not always reflect the expected wattage.</p> <p>85 items of load do not have information populated in the light model fields. 53 of these had some information populated in the "If Other Light Type Pls Specify" field, and I confirmed that 42 had a wattage consistent with that description. 35 had insufficient information to confirm the correct wattages, and eight had wattages inconsistent with the description.</p> <p>29 poles had a zero-value wattage value when a non-zero value was expected.</p> <p>There is not a clear process to communicate festive light wattages and on and off dates to Genesis. Under submission is expected as festive lights wattages were not included in the January 2023 database extract provided to Genesis.</p> <p>Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times</p> <p>Controls: Weak Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
High	<p>The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.</p> <p>The audit risk rating is high based on kWh variances identified.</p>

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