

Compliance plan for Napier City Council DUML 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 30-May-22 To: 01-Dec-22</p>	<p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>In absolute terms, total annual consumption is estimated to be 137,000 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>12 items of load with the incorrect ballast recorded resulting in an estimated very minor estimated under submission of 198 kWh.</p> <p>46 lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 20,403 kWh.</p> <p>Potential impact: High Actual impact: High</p> <p>Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the field findings indicate that the database management processes have not improved during the audit period.</p> <p>The impact is assessed to high due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will investigate and discuss with NCC if they are happy to assist with installation of a check meter to have a profile shape created.</p> <p>Genesis has notified PSL of the discrepancies for the incorrect ballast with an intent these exceptions are rectified.</p> <p>Genesis has reviewed the auditors finding and have advised NCC of the discrepancy around the lights that are recorded as "Private" with the intent that NCC makes every effort to ensure the exceptions are rectified.</p>	10/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis is trying to get council's engagement so discrepancies can be resolved	10/07/2023	

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: 30-May-22</p> <p>To: 01-Dec-22</p>	<p>Nine items of load with no ICP and incorrectly recorded as "PRIVATE".</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are rated as weak because the design of the database does not ensure ICP identifiers are correct.</p> <p>The audit risk rating is low as there were only nine items of load without an ICP associated.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised NCC of the discrepancy with the intent that NCC makes every effort to ensure the exceptions are rectified.		10/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis is trying to get council's engagement so discrepancies can be resolved		10/06/2023	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 30-May-22 To: 01-Dec-22	Errors are still present from previous audits. Three additional lights were found in the field of 372 items of load sampled. Potential impact: Medium Actual impact: Low Audit history: Three times previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as weak as the processes in place do not ensure that the changes in the database are updated. The impact is assessed to be low based on number of additional lights found in the field in comparison to the overall number of lights checked.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis is trying to get council's engagement so discrepancies can be resolved.	10/07/2023	Identified
Genesis has notified PSL of additional lights found in field. PSL is going to arrange for a contractor to go on site and update RAMM.	10/07/2023	
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis is trying to get council's engagement so discrepancies can be resolved.	10/07/2023	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 13-May-21</p> <p>To: 30-May-22</p>	<p>In absolute terms, total annual consumption is estimated to be 137,000 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>Incorrect ICP identifiers because they are against the pole not the light.</p> <p>46 lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 20,403 kWh.</p> <p>12 items of load with the incorrect ballast recorded resulting in an estimated very minor estimated under submission of 198 kWh.</p> <p>18 items of load with the incorrect ICP identifier recorded.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the field findings indicate that the database management processes do not track changes made in the field especially in relation to the addition of new lights to the database.</p> <p>The impact on settlement and participants is assessed to be high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>NCC has been notified of the discrepancies. Genesis relies on NCC to accurately maintain its database.</p> <p>Genesis has notified PSL about auditor's findings to have ICP identifiers listed against light with an intent that actions is taken to have this rectified.</p> <p>PSL have been notified about the incorrect ballast recorded.</p>	10/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis is trying to get council's engagement so discrepancies can be resolved	10/07/2023	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 30-May-22</p> <p>To: 01-Dec-22</p>	<p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>In absolute terms, total annual consumption is estimated to be 137,000 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>12 items of load with the incorrect ballast recorded resulting in an estimated very minor estimated under submission of 198 kWh.</p> <p>46 lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 20,403 kWh.</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 are rated as weak as the field findings indicate that the database management processes have not improved during the audit period.</p> <p>The impact is assessed to high due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will discuss with NCC if they are happy to assist with installation of a check meter to have a profile shape created.</p> <p>Genesis has notified PSL of the discrepancies for the incorrect ballast with an intent these exceptions are rectified.</p> <p>Genesis has reviewed the auditors finding and have advised NCC of the discrepancy around the lights that are recorded as "Private" with the intent that NCC makes every effort to ensure the exceptions are rectified.</p>	10/07/2023	Identified
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