Compliance plan for Genesis Waka Kotahi Waikato DUML 2023

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	Submission values did not align for the month of October 2022 due to the registry figures being used. This will have resulted in an estimated under submission of 152,365.64 kWh.	
Scriedule 13.3	Data loggers used across more than one network resulting in the incorrect burn hours being applied.	
	Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 1,456,700 kWh per annum.	
	256 items of load with zero wattage recorded potentially resulting in an estimated under submission of 183,687 kWh p.a.	
	Five 250W HPS light recorded with an incorrect wattage recorded resulting in an estimated under submission of 3,396 kWh p.a.	
	78 items of load with the incorrect ballast applied resulting in a very minor estimated under submission of 234 kWh p.a.	
	98 items of load missing from ICP 0001111171WM17A resulting in an estimated monthly under submission of 6,157 kWh per month since 1 September 2022.	
	Potential impact: High	
	Actual impact: High	
From: 02-May-22	Audit history: Three times previously	
To: 11-Nov-22	Controls: Moderate	
	Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as moderate as Genesis and Waka Kotahi are working to improve the data quality and once complete the data capture going forward is expected to be good.	
	The impact is assessed to be high due to the estimated kWh impact however once RAMM is used for submission on a regular basis I expect the database accuracy to improve, and volume corrections will flow through the revision process.	

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has been helping NZTA with asset reallocation and will be revising submissions once asset reallocation has been completed.	01/07/2023	Identified
Genesis will identify the loggers which the auditor is concerned about and try to find if there is another logger available which is closer. If no other loggers are available Genesis will arrange for a quote for installing a new logger and send it to NZTA Waikato for approval.		
The database provided to the auditor is no longer being used. NZTA have started providing and managing their own dataset from January 2023. Genesis relies on NZTA to accurately maintain its database.		

ICP Identifier			
Non-compliance	Description		
Audit Ref: 2.2 With: Clause 11(2)(a) & (aa)of Schedule 15.3	20 items of load with no ICP recorded potentially resulting in an estimated under submission of 14,350 kWh p.a. Potential impact: Medium Actual impact: Medium		
From: 02-May-22	Audit history: None Controls: Moderate		
To: 11-Nov-22	Breach risk rating: 4		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as moderate as Genesis and Waka Kotahi have worked together to ensure that ICPs are correctly allocated. I expect this to move to strong once the Waka Kotahi RAMM database is being provided on a regular basis. The impact is assessed to be medium due to the potential impact on reconciliation.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA have advised Solar has been listed in ICP field for relevant load. All remaining items have been allocated ICP's		25/01/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to work with NZTA to increase accuracy levels in their database.		25/01/2023	

Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3	544 items of load (7.7%) of the 7,016 total items of load have no GPS coordinates or location number populated and are not locatable. Potential impact: Low		
	Actual impact: Low Audit history: None		
From: 02-May-22 To: 11-Nov-22	Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as contractors use pocket RAMM to update the field and the historic data missing has or is being populated. The impact is assessed to be low as the database quality is continually being improved so the number of unlocatable items is expected to decline and data accuracy improve.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA have advised that the RAMM currently with them only has 59 items of load with no GPS coordinates. 90% of these are related to the new Hamilton expressway lights recently added. GPS locations will be determined from physical checks by matching pole IDs and location.		01/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to work with NZTA to increase accuracy levels in their database.		01/07/2023	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) &	256 items of load with zero wattage recorded potentially resulting in an estimated under submission of 183,687 kWh p.a.		
(d)of Schedule 15.3	Potential impact: High		
	Actual impact: High		
	Audit history: Twice previously		
From: 02-May-22	Controls: Moderate		
To: 11-Nov-22	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate as Genesis and Waka Kotahi are working to improve the data quality and once complete the data capture going forward is expected to be good.		
	The impact is assessed to be high based on the kWh difference identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA have advised that in the updated RAMM file there are only 22 items of load with zero wattage. NZTA will be investigating these and arrange for site visits where necessary so accurate information is updated in RAMM		01/07/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to work with NZTA to increase accuracy levels in their database.		01/07/2023	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	23 additional items of load found in the field of a sample of 389 (6% error rate).		
With: Clause 11(2A) of Schedule 15.3	Potential impact: High		
Schedule 15.3	Actual impact: High		
5 02.14 22	Audit history: Once previously		
From: 02-May-22	Controls: Moderate		
To: 11-Nov-22	Breach risk rating: 6		
Audit risk rating	Rationale fo	r audit risk rating	
High	The controls are rated as moderate as Genesis and Waka Kotahi are cleansing the RAMM database and the most recent data extract provided to Genesis is close to being usable. The impact is assessed to be high, as the current dataset being used for		
	submission has duplications and not all changes made since April have been updated in the Genesis dataset. This is expected to improve once monthly RAMM extracts are provided. This is expected to commence in early 2023.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised NZTA of the discrepancy with the intent that NZTA makes every effort to ensure the exceptions are rectified.		01/07/2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis continues to work with NZTA to increase accuracy levels in their database.		1/07/2023	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	Submission values did not align for the month of October 2022 due to the registry figures being used. This will have resulted in an estimated under submission of 152,365.64 kWh.	
15.57 b(c)	Data loggers used across more than one network resulting in the incorrect burn hours being applied.	
	Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 1,456,700 kWh per annum.	
	256 items of load with zero wattage recorded potentially resulting in an estimated under submission of 183,687 kWh p.a.	
	Five 250W HPS light recorded with an incorrect wattage recorded resulting in an estimated under submission of 3,396 kWh p.a.	
	78 items of load with the incorrect ballast applied resulting in a very minor estimated under submission of 234 kWh p.a.	
	98 items of load missing from ICP 0001111171WM17A resulting in an estimated monthly under submission of 6,157 kWh per month since 1 September 2022.	
From: 02-May-22	Potential impact: High	
To: 11-Nov-22	Actual impact: High	
	Audit history: Three times previously	
	Controls: Moderate	
	Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as moderate as Genesis and Waka Kotahi are working to improve the data quality and once complete the data capture going forward is expected to be good.	
	The impact is assessed to be high due to the estimated kWh impact however once RAMM is used for submission on a regular basis I expect the database accuracy to improve, and volume corrections will flow through the revision process.	

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has been helping NZTA with asset reallocation and will be revising submissions once asset reallocation has been completed.	01/07/2023	Identified
Genesis will identify the loggers which the auditor is concerned about and try to find if there is another logger available which is closer. If no other loggers are available Genesis will arrange for a quote for installing a new logger and send it to NZTA Waikato for approval.		
The database provided to the auditor is no longer being used. NZTA have started providing and managing their own dataset from January 2023. Genesis relies on NZTA to accurately maintain its database.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with NZTA to increase accuracy levels in their database.	01/07/2023	