

Compliance plan for Palmerston North CC (Mercury) – 2023

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.11 With: Clause 16A.26 and 17.295F From: 26-Mar-23 To: 28-Mar-23	The audit was not completed by the due date. Potential impact: High Actual impact: Unknown Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are assessed to be moderate because the audit was completed close to the due date. The impact is assessed to be low, because completing the audit earlier was unlikely to impact on compliance.	
Actions taken to resolve the issue	Completion date	Remedial action status
Palmerston North City Council switched to Mercury in October 2022 and there were some teething issues in terms of establishing contact with the appropriate people and receiving responses to our queries.	April 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
There have been learnings from this instance and we aim to mitigate delays in the future.	Ongoing	

Deriving submission information	
Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	The best available estimate is not precise enough to conclude that the database is accurate within $\pm 5\%$. There is a 95% level of confidence that the annual consumption is between 32,500 and 188,700 kWh p.a. lower than the database indicates. 34 LED items of connected to DUMML ICPs have a blank lamp wattage but are expected to have a gear wattage of zero. There is no impact on submission. 71 lamps have lamp wattages which differ from the expected value based on the lamp specifications. PNCC intends to update the wattages to reflect the expected values. The estimated impact is 5,018 kWh of under submission per annum.

<p>From: 01-Dec-22 To: 11-Mar-23</p>	<p>Seven disconnected lamps have wattages recorded against DUML ICs. The estimated impact is 2,992 kWh of over submission per annum.</p> <p>Correct wattages were unable to be confirmed for 63 lamps. A list of the affected lamps was provided to PNCC for investigation and correction if necessary.</p> <p>14 lamps have gear wattages which differ from the expected value based on the gear specifications. PNCC intends to update the wattages to reflect the expected values. The estimated impact is 290 kWh of over submission per annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Medium</p>	<p>The controls over the database are moderate; there has been a significant reduction in the quantity of incorrect wattages and PNCC has indicated that they intend to correct the discrepancies.</p> <p>The impact is assessed to be medium, based on the kW differences identified during the wattage accuracy checks for the whole database and that a small number of wattage discrepancies 7/503 (1%) were identified during the field audit. Database accuracy could not be confirmed to be within $\pm 5\%$ due to these discrepancies although both point of estimate R and R_H were both within the threshold.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Palmerston North CC have been made aware of the discrepancies and have advised that they will be making the appropriate corrections.</p>	<p>April 2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Palmerston North City Council are aware of the importance of having an accurate database and we will continue to liaise with them on this.</p>	<p>Ongoing</p>	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 28-Feb-23 To: 28-Feb-23	There is insufficient location information to allow pole ID 64681 to be readily located. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are strong, as almost all lights had sufficient address information recorded. The audit risk rating is low because only one light had insufficient address information recorded and it was connected recently.	
Actions taken to resolve the issue	Completion date	Remedial action status
Palmerston North City Council have advised that they will update the database for this pole.	April 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Palmerston North City Council are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	

Description and capacity of load	
Non-compliance	Description
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 28-Feb-23 To: 28-Feb-23	34 LED items of load connected to DUMML ICPs have a blank gear wattage but should have a gear wattage of zero. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	The controls are strong, as almost all connected lights have valid gear wattages recorded. There is no impact because all the missing wattages should be zero.

Actions taken to resolve the issue	Completion date	Remedial action status
Palmerston North City Council will be populating the relevant blank gear wattage cells with zeroes.	April 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Palmerston North City Council are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 11-Mar-23 To: 11-Mar-23	One CCTV camera was missing from pole ID L10008 outside One School Global on Johnstone Drive. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls over the completeness of database information are assessed to be moderate because the differences are recent changes and are expected to be timing differences. The impact is low, based on the expected wattage.	
Actions taken to resolve the issue	Completion date	Remedial action status
Palmerston North City Council are updating the database.	April 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Palmerston North City Council are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 28-Feb-23</p> <p>To: 11-Mar-23</p>	<p>The best available estimate is not precise enough to conclude that the database is accurate within $\pm 5\%$. There is a 95% level of confidence that the annual consumption is between 32,500 and 188,700 kWh p.a. lower than the database indicates.</p> <p>34 LED items of connected to DUMML ICs have a blank lamp wattage but are expected to have a gear wattage of zero. There is no impact on submission.</p> <p>71 lamps have lamp wattages which differ from the expected value based on the lamp specifications. PNCC intends to update the wattages to reflect the expected values. The estimated impact is 5,018 kWh of under submission per annum.</p> <p>Seven disconnected lamps have wattages recorded against DUMML ICs. The estimated impact is 2,992 kWh of over submission per annum.</p> <p>Correct wattages were unable to be confirmed for 63 lamps. A list of the affected lamps has been provided to PNCC for investigation and correction if necessary.</p> <p>14 lamps have gear wattages which differ from the expected value based on the gear specifications. PNCC intends to update the wattages to reflect the expected values. The estimated impact is 290 kWh of over submission per annum.</p> <p>The lamp description for "TerraLED Mini 34W AP2 4000k" is incorrect, and should be "TerraLED Mini 24W AP2 4000k". The lamp and gear wattages for the 83 affected lamps are correct, and there is no impact on submission.</p> <p>Pole ID 64681 has insufficient address information recorded to enable it to be readily located.</p> <p>Potential impact: High</p> <p>Actual impact: High</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	
Medium	<p>The controls over the database are moderate; there has been a significant reduction in the quantity of incorrect wattage and PNCC has indicated that they intend to correct the discrepancies.</p> <p>The impact is assessed to be medium, based on the kW differences identified during the wattage accuracy checks for the whole database and that a small number of wattage discrepancies 7/503 (1%) were identified during the field audit. Database accuracy could not be confirmed to be within $\pm 5\%$ due to these discrepancies although both point of estimate R and R_H were both within the threshold.</p>	
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Preventative actions taken to ensure no further issues will occur	Completion date
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Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Dec-22</p> <p>To: 11-Mar-23</p>	<p>The best available estimate is not precise enough to conclude that the database is accurate within $\pm 5\%$. There is a 95% level of confidence that the annual consumption is between 32,500 and 188,700 kWh p.a. lower than the database indicates.</p> <p>34 LED items of connected to DUMML ICPs have a blank lamp wattage but are expected to have a gear wattage of zero. There is no impact on submission.</p> <p>71 lamps have lamp wattages which differ from the expected value based on the lamp specifications. PNCC intends to update the wattages to reflect the expected values. The estimated impact is 5,018 kWh of under submission per annum.</p> <p>Seven disconnected lamps have wattages recorded against DUMML ICPs. The estimated impact is 2,992 kWh of over submission per annum.</p> <p>Correct wattages were unable to be confirmed for 63 lamps. A list of the affected lamps has been provided to PNCC for investigation and correction if necessary.</p> <p>14 lamps have gear wattages which differ from the expected value based on the gear specifications. PNCC intends to update the wattages to reflect the expected values. The estimated impact is 290 kWh of over submission per annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p> <p>Actual impact: Unknown</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
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