

# Compliance plan for Greater Wellington Regional Council 2022

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Jul-22</p> <p>To: 25-Jan-23</p>	<p>Under submission of 12.8 kWh per annum due to incorrect gear wattage.</p> <p>53 lights associated with Porirua Carpark incorrectly assigned to PNI0331 GXP and not TKR0331.</p> <p>Under submission of approx. 2,270 kWh per annum for ICP 0000161690CK4EE and over submission of 1,046 kWh per annum for ICP 0000160523CK83F due to not using the current database capacities.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated over submission of 5,164 kWh p.a.</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: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as moderate, as while the database accuracy has improved, the process to revise Meridian's database capacities for the two ICPs is not robust resulting in out-of-date information being used.</p> <p>The volume impact is small therefore the audit risk rating is low.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We have met with GWRC to review all audit findings.</p> <p>Field audit findings will be validated with GWRC contractors and database corrections made where required.</p> <p>We are confirming with Wellington Electricity the GXP that Porirua Station is fed from and will have a new ICP created for these lights if this is confirmed.</p>		<p>27 Feb 23</p> <p>30 April 23</p> <p>30 April 23</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>We have agreed a process for GWRC to notify us of any future updates to the DURL database. These are expected to be infrequent now their station lighting upgrade projects are complete.</p>		Ongoing	

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 01-Jul-22 To: 25-Jan-23	ICP assignment is not correct for all items of load resulting in incorrect allocation of submission volumes to the respective NSP. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as all lights are assigned an ICP on entry to the database. The impact is rated as low as both NSPs are part of the same balancing area.	
Actions taken to resolve the issue	Completion date	Remedial action status
We are confirming with Wellington Electricity the GXP that Porirua Station is fed from and will have a new ICP created for these lights if this is confirmed.	30 April 23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Jul-22 To: 25-Jan-23	Location information not sufficient to locate each item of load. Potential impact: Low Actual impact: Low Audit history: Twice Controls: None Breach risk rating: 5	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The database does not contain location details apart from a description field identifying the carpark the light is located. The impact on settlement and participants is minor; therefore, the audit risk rating is low. The main impact is that the audit is difficult to conduct, and discrepancies are difficult to identify.	
Actions taken to resolve the issue		Completion date
The addition of GPS co-ordinates to the GWRC database is a planned future improvement.		31 Dec 2023
Preventative actions taken to ensure no further issues will occur		Completion date
Remedial action status		
Identified		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 01-Jul-22 To: 25-Jan-23	One additional lamp in the field was not recorded in the database.  Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong as recent installations of new lights at the Porirua station in October 2022 have been reflected in the database.  The audit risk rating is low based on the small volume of lights across the database population.	
Actions taken to resolve the issue	Completion date	Remedial action status
Field audit findings will be validated with GWRC contractors and database corrections made where required.	30 April 23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jul-22</p> <p>To: 25-Jan-23</p>	<p>Under submission of 12.8 kWh per annum due to incorrect gear wattage.</p> <p>53 lights associated with Porirua Carpark incorrectly assigned to PNI0331 GXP and not TKR0331.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated over submission of 5,164 kWh p.a.</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: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate due to poor accuracy found in the field.</p> <p>The database is largely accurate therefore the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We have met with GWRC to review all audit findings.</p> <p>Field audit findings will be validated with GWRC contractors and database corrections made where required.</p> <p>We are confirming with Wellington Electricity the GXP that Porirua Station is fed from and will have a new ICP created for these lights if this is confirmed.</p>	<p>27 Feb 23</p> <p>30 April 23</p> <p>30 April 23</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>We have agreed a process for GWRC to notify us of any future updates to the DUML database. These are expected to be infrequent now their station lighting upgrade projects are complete.</p>	Ongoing	

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-Jul-22</p> <p>To: 25-Jan-23</p>	<p>Under submission of 12.8 kWh per annum due to incorrect gear wattage.</p> <p>Under submission of approx. 2,270 kWh per annum for ICP 0000161690CK4EE and over submission of 1,046 kWh per annum for ICP 0000160523CK83F due to not using the current database capacities.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated over submission of 5,164 kWh p.a.</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: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are recorded as moderate, as while the database accuracy has improved, the process to revise Meridian's database capacities for the two ICPs is not robust resulting in out-of-date information being used.</p> <p>The volume impact is small therefore the audit risk rating is low.</p>	
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Preventative actions taken to ensure no further issues will occur		Completion date
<p>We have agreed a process for GWRC to notify us of any future updates to the DUML database. These are expected to be infrequent now their station lighting upgrade projects are complete.</p>		Ongoing
Remedial action status		
Identified		