

Compliance Plan Marlborough DUML 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: 15-Oct-21</p> <p>To: 01-Aug-22</p>	<p>A correction has not been made to the estimated under submission of 31,968 kWh per annum identified in the previous audit.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</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 are rated as moderate as processes to manage change capture most changes.</p> <p>The impact is assessed to be medium based on the submission values detailed above.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis has identified the reason due to which the volumes calculated were low and has made the required change in process to avoid this happening again. As the period where submissions need to be revised is falling outside of 14 months Genesis is unable to make the revision.</p>		31/03/2023
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis has made the required change in process to correct volumes can be calculated.</p>		31/03/2023
Identified		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 15-Oct-21 To: 01-Aug-22	One additional item of load found in the field of the 401 items of load sampled. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as Marlborough Lines have robust processes to ensure that changes are tracked, and this is reflected in the high level of accuracy found in the database. The impact is assessed to be low as the database was found to be within the allowable accuracy threshold as detailed in section 3.1 .	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised MDC of the discrepancy with the intent that MDC makes every effort to ensure the exceptions are rectified.	28/02/2023	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis continues to work with the council to increase accuracy levels in their database.	Continuous Improvement	

Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.6 Clause 11(3) of Schedule 15.3 From: 15-Oct-21 To: 01-Aug-22	Changes not tracked in EAM. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as whilst the processes for updating the database are robust, it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised MDC of requirement of visibility of tracking of change within their data base. Genesis relies on MDC to accurately maintain its database and provide information required.	28/02/2023	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis continues to work with the council to increase accuracy levels in their database.	28/02/2023	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 Clause 11(4) of Schedule 15.3 From: 15-Oct-21 To: 01-Aug-22	Audit trail not visible in EAM. Potential impact: Low 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 rated as weak as whilst the processes for updating the database are robust, it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors findings and have advised MDC of requirement of visibility of tracking of change within their data base. Genesis relies on MDC to accurately maintain its database and provide the information required.	28/02/2023	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis continues to work with the council to increase accuracy levels in their database.	28/02/2023	

Volume information accuracy		
Non-compliance	Description	
Audit Ref: 3.2 Clause 15.2 and 15.37B(c) From: 15-Oct-21 To: 01-Aug-22	A correction has not been made to the estimated under submission of 31,968 kWh per annum identified in the previous audit. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate as processes to manage change capture most changes. The impact is assessed to be medium based on the submission values detailed above.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has identified the reason due to which the volumes calculated were low and has made the required change in process to avoid this happening again. As the period where submissions need to be revised is falling outside of 14 months Genesis is unable to make the revision.	31/03/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has made the required change in process to correct volumes can be calculated.	31/03/2023	

