

Compliance plan for Genesis Energy Whakatane DC DUML audit 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: 08-Oct-21</p> <p>To: 30-Sep-22</p>	<p>Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Two ICPs with no unmetered load associated not decommissioned resulting in over submission of 11,064 kWh occurring since September 2020 to date.</p> <p>Variance found between the kWh figure submitted by Genesis and the RAMM database extract, resulting in an estimated annual under submission 141,474 kWh per annum.</p> <p>No database reporting is being provided and therefore changes made in the database are not reflected in submissions.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times 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 submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the submission variances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will re-engage with the council in installing a Golden meter to use CMS data however until the golden meter has been installed and supporting data has been obtained to validate on/off times and asset kWh within CMS, Genesis will continue to work with the council to obtain monthly data output.</p> <p>Genesis has requested the WDC to confirm a date from which there were no assets connected to ICP's 1000023042BPD32 and 1000023061BPCA7. Once we receive a confirmation of the date and an approval for the decommission, we will proceed to have the ICP's decommissioned.</p> <p>Genesis is currently using registry information for submission and have requested WDC to provide database monthly so +/- in submission can be looked at and monthly changes made can reflect in submission.</p>	Continuous improvement	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will work with the council to increase accuracy levels in their database.	Continuous improvement	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 08-Oct-21 To: 30-Sep-22	One item of load not readily locatable. Potential impact: Low Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as the processes in place will mitigate risk to an acceptable level. The impact is assessed to be none but low is the only option available to assign.	
Actions taken to resolve the issue	Completion date	Remedial action status
Whakatane DC has been advised of the discrepancy and relies on them to accurately maintain the database.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will work with the council to increase accuracy levels in their database.	Continuous improvement	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 08-Oct-21</p> <p>To: 30-Sep-22</p>	<p>One item of load is not readily locatable.</p> <p>New connections are recorded from the time of vesting, not from the time of livening.</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		
Low	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is assessed to be low due to the error in kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has requested WDC to provide a database so we can review it and report exceptions like location ballast etc.</p> <p>Genesis has reviewed the auditors finding and have advised WDC of the discrepancy with the intent that WDC makes every effort to ensure the exceptions are rectified.</p>		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will work with the council to help them increase database accuracy.		Continuous Improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 08-Oct-21</p> <p>To: 30-Sep-22</p>	<p>Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Two ICPs with no unmetered load associated not decommissioned resulting in over submission of 11,064 kWh occurring since September 2020 to date.</p> <p>Variance found between the kWh figure submitted by Genesis and the RAMM database extract, resulting in an estimated annual under submission 141,474 kWh per annum.</p> <p>No database reporting is being provided and therefore changes made in the database are not reflected in submissions.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times 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 submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the submission variances.</p>	
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<p>Genesis will re-engage with the council in installing a Golden meter to use CMS data however until the golden meter has been installed and supporting data has been obtained to validate on/off times and asset kWh within CMS, Genesis will continue to work with the council to obtain monthly data output.</p> <p>Genesis has requested the WDC to confirm a date from which there were no assets connected to ICP's 1000023042BPD32 and 1000023061BPCA7. Once we receive a confirmation of the date and an approval for the decommission, we will proceed to have the ICP's decommissioned.</p> <p>Genesis is currently using registry information for submission and have requested WDC to provide database monthly so +/- in submission can be looked at and monthly changes made can reflect in submission.</p>	Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will work with the council to increase accuracy levels in their database.	Continuous improvement	