

Compliance plan for Wellington CC DUML 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Sep-22 To: 31-Mar-23</p>	<p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> • 98,700 kWh per annum under submission from field audit, • 8,362 per annum under submission due to incorrect lamp or gear wattages, • 77,206 kWh potential under submission relating to waterfront lighting not accounted for, • 3,241 kwh under submission from exceptions identified from the previous audit where no database updates have been performed, • the wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,244 kWh annually, and • dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights; the impact varies but is expected to be low. <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: High Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in sections 2.5 and 3.1.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will advise WCC of the audit findings and will request a meeting for resolution.	30/4/2023	Identified
We are in discussions with WCC regarding the operational requirements for use of approved static dimming profiles.	Ongoing	
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to follow up with WCC re database corrections and maintenance.	31/10/2023	
We will continue to work with WCC to implement an approved method of settlement for dimming lights	Ongoing	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clauses 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 01-Oct-22</p> <p>To: 31-Mar-23</p>	<p>Some description and capacity information is incomplete or unknown, including:</p> <ul style="list-style-type: none"> • 111 lamps with unknown or blank lamp descriptions, and • 147 lamp and/or gear wattages discrepancies resulting in an under submission of 8,362 kWh per annum. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate, as they are sufficient to ensure that almost all items of load have wattage and description information recorded.</p> <p>The impact is estimated to be low, based on the information available.</p>	
Actions taken to resolve the issue		Completion date
We will advise WCC of the audit findings and will request a meeting for resolution.		30/04/2023
Preventative actions taken to ensure no further issues will occur		Completion date
We will continue to follow up with WCC re database corrections and maintenance.		31/10/2023
		Identified

All load recorded in database			
Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: Clauses 11(2A) of Schedule 15.3</p> <p>From: 01-Oct-22</p> <p>To: 31-Mar-23</p>	<p>15 additional lamps in the field were not recorded in the database from a sample of 546 items of load.</p> <p>173 light installations relating to Great Harbour Way/Te Aranui o Poneke, Commonwealth Walkway and Clyde Quay walkway not recorded in the database with an assessed load of 77,206 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Controls are rated as weak due to the lack of clarity around the lights associated with the waterfront walkways.</p> <p>The impact is estimated to be high, based on the volume assessed for the missing waterfront walkways.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
We will advise WCC of the audit findings and will request a meeting for resolution.		30/04/2023	Identified
Meridian will advise and discuss with WCC to confirm who is responsible for the illuminated paths along the Wellington Waterfront.		30/05/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to follow up with WCC re database corrections and maintenance.		31/10/2023	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Oct-22</p> <p>To: 31-Mar-23</p>	<p>The database accuracy is assessed to be 101.7% of the database for the sample checked indicating a potential under submission of approximately 98,700 kWh per annum.</p> <p>147 lamp and/or gear wattage discrepancies resulting in an under submission of 8,362 kWh per annum (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).</p> <p>The field audit identified 35 items of load that have incorrect wattages and 15 additional lights not recorded in the database, leading to an over submission by 1,554 kWh per annum.</p> <p>Some description and capacity information is incomplete or unknown, including:</p> <ul style="list-style-type: none"> • 111 lamps with unknown or blank lamp descriptions, and • 147 lamp and/or gear wattages discrepancies resulting in an under submission of 8,362 kWh per annum. <p>173 light installations relating to Great Harbour Way/Te Aranui o Poneke, Commonwealth Walkway and Clyde Quay walkway not recorded in the database with an assessed load of 77,206 kWh per annum.</p> <p>Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low.</p> <p>3,241 kwh under submission from exceptions identified from the previous audit where no database updates have been performed.</p> <p>The wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,244 kWh annually.</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: High</p> <p>Audit history: Three times</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, because they are not sufficient to ensure that database wattage is consistently accurate.</p> <p>The impact is assessed to be high based on the wattage differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>We will advise WCC of the audit findings and will request a meeting for resolution.</p> <p>Meridian will advise and discuss with WCC to confirm who is responsible for the illuminated paths along the Wellington Waterfront.</p> <p>We are in discussions with WCC regarding the operational requirements for use of approved static dimming profiles.</p>	<p>30/04/2023</p> <p>31/05/2023</p> <p>Ongoing</p>	<p>Identified</p>
<p>Preventative actions taken to ensure no further issues will occur</p>	<p>Completion date</p>	
<p>We will continue to follow up with WCC re database corrections and maintenance.</p> <p>We will continue to work with WCC to implement an approved method of settlement for dimming lights.</p>	<p>31/10/2023</p> <p>Ongoing</p>	

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-Oct-22</p> <p>To: 31-Mar-23</p>	<p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> • 98,700 kWh per annum under submission from field audit, • 8,362 per annum under submission due to incorrect lamp or gear wattages, • 77,206 kWh potential under submission relating to waterfront lighting not accounted for, • 3,241 kWh under submission from exceptions identified from previous audit where no database updates have been performed, • the wattage for dimmed lights is rounded and this will be resulting in an estimated over submission of 6,244 kWh annually, and • dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights; the impact varies but is expected to be low. <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: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1 which in turn impacts volume information accuracy.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
We will advise WCC of the audit findings and will request a meeting for resolution.	30/04/2023	Identified
We are in discussions with WCC regarding the operational requirements for use of approved static dimming profiles.	Ongoing	
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to follow up with WCC re database corrections and maintenance.	31/10/2023	
We will continue to work with WCC to implement an approved method of settlement for dimming lights.	Ongoing	