

# Compliance plan for Central Otago DC Contact Energy DUML 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 12-Jan-22</p> <p>To: 08-May-23</p>	<p>Over submission of an estimated 25,000 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.</p> <p>The data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Three lamps with incorrect ballast applied resulting in a very minor over submission.</p> <p>In absolute terms, total annual consumption is estimated to be 7,200 kWh lower than the DUML database indicates.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as weak because the new dimming profile is not being applied.</p> <p>The impact is assessed to be medium due to the impact of over submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
CODC are working with their Streetlight Maintenance team to have correct ballast information added	01/10/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Regular checking of this information to ensure accuracy	01/10/2023	

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 Clause 11(2)(a) & (aa) of Schedule 15.3  From: 12-Jan-22 To: 08-May-23	The ICP is not recorded in the database for 16 items of load. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as the ICP is recorded for all but 16 items of load. The impact is assessed to be low due to the impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
CODC have now added the ICPs for these 16 items	23/06/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
CODC may look to make this field mandatory	01/07/2023	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 12-Jan-22 To: 08-May-23	Four additional lights were found in the field. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate because they ensure most information is accurate. The impact is assessed to be low due to four additional lights found in the field in relation to the overall count of the items of load.	
Actions taken to resolve the issue	Completion date	Remedial action status
CODC are working with their Streetlight Maintenance team to identify these lights and correct	01/10/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Regular checking of this information to ensure accuracy	01/10/2023	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 19-Jul-21</p> <p>To: 11-Jan-22</p>	<p>In absolute terms, total annual consumption is estimated to be 7,200 kWh lower than the DUMML database indicates.</p> <p>Three lamps with incorrect ballast applied resulting in very minor over submission.</p> <p>New lights are not added to RAMM at the date of electrical connection.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate, because field audit indicated the controls are robust but there is room for errors to occur.</p> <p>The impact is assessed to be low due to the kWh impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
CODC are working with their Streetlight Maintenance team to have correct ballast information added	01/10/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Regular checking of this information to ensure accuracy	01/10/2023	

<b>Volume information accuracy</b>		
<b>Non-compliance</b>	<b>Description</b>	
Audit Ref: 3.2 Clause 15.2 and 15.37B(c)  From: 12-Jan-22 To: 08-May-23	Over submission of an estimated 25,000 kWh per annum due to the hard-wired dimming LED lamps for 83% of the total lamps installed.  The data used for submission does not track changes at a daily basis and is provided as a snapshot.  Three lamps with incorrect ballast applied resulting in very minor over submission.  In absolute terms, total annual consumption is estimated to be 7,200 kWh lower than the DUML database indicates.  Potential impact: Medium  Actual impact: Medium  Audit history: Multiple times previously  Controls: Weak  Breach risk rating: 6	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>Medium</b>	The controls are rated as weak because the new dimming profile is not being applied.  The impact is assessed to be medium due to the impact of over submission.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
CODC are working with their Streetlight Maintenance team to have correct ballast information added	01/10/2023	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Regular checking of this information to ensure accuracy	01/10/2023	