

Compliance plan for Kawerau DC DUML 2023

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 From: 15-Feb-23 To: 23-May-23	Audit report not completed by due date. 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 because Genesis puts significant effort into ensuring audits are completed on time. The impact is assessed to be low because the delay was largely to accommodate a full field audit of the load in the database.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis discussed with KDC and after mutually agreeing with KDC opted to delay the audit. Genesis has also received an extension from the EA until end of May-2023 to complete this audit. The reason to delay was to ensure full field audit is completed and RAMM updated with latest findings (This can be seen in the dataset provided for auditing). Genesis has been continuously working with KDC and their contractors to improve on all compliance aspects.	26/05/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will continue to work with the council to help them increase database accuracy.	26/05/2023	

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>Clause 11(1) of Schedule 15.3</p> <p>From: 01-Sep-22</p> <p>To: 24-May-23</p>	<p>Submission incorrect for April 2023.</p> <p>On off times are based on a logger located in Taupo and not in Kawerau.</p> <p>Some ballast wattage discrepancies leading to over submission of 11,131 kWh per annum.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</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 have improved during the audit period. A full field audit was conducted and Kawerau DC is now responsive to the audit findings. The controls are rated as moderate.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has revised submissions for April 2023.</p> <p>Genesis will investigate if any other logger is available which is closer to the one currently being used.</p> <p>Genesis has brought this to the attention of KDC and relies on KDC to accurately maintain their database.</p> <p>Genesis will discuss with KDC to add more details to their database rather than a snapshot so It gives more visibility and changes are clearly indicated to submit volumes more accurately</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to work with the council to help them increase database accuracy.		Continuous Improvement	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Sep-22 To: 24-May-23	Five additional lights in the field Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue		Completion date
Genesis has informed KDC of the auditors finding with the intent that KDC makes every effort to ensure the exceptions are rectified.		01/09/2023
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis relies on KDC to accurately maintain its database.		01/09/2023
		Identified

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Sep-22</p> <p>To: 24-May-23</p>	<p>Festive lighting is connected but the volume is not recorded.</p> <p>Some ballast wattage discrepancies leading to over submission of 11,131 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</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 have improved during the audit period. A full field audit was conducted and Kawerau DC is now responsive to the audit findings. The controls are rated as moderate.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has brought this to the attention on KDC to add festive lighting to RAMM.</p> <p>Genesis has advised KDC to update correct ballast in RAMM and provide an updated dataset so submission can be revised accordingly</p>		01/09/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to 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>Clause 15.2 and 15.37B(c)</p> <p>From: 01-Sep-22</p> <p>To: 24-May-23</p>	<p>Submission incorrect for April 2023.</p> <p>On off times are based on a logger located in Taupo and not in Kawerau.</p> <p>Some ballast wattage discrepancies leading to over submission of 11,131 kWh per annum.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</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 have improved during the audit period. A full field audit was conducted and Kawerau DC is now responsive to the audit findings. The controls are rated as moderate.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has revised submissions for April 2023.</p> <p>Genesis will investigate if any other logger is available which is closer to the one currently being used.</p> <p>Genesis has brought this to the attention of KDC and relies on KDC to accurately maintain their database.</p> <p>Genesis will discuss with KDC to add more details to their database rather than a snapshot so It gives more visibility and changes are clearly indicated to submit volumes more accurately</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to work with the council to help them increase database accuracy.		Continuous Improvement	