

Compliance Plan South Taranaki DC DUML 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 13-Apr-23 To: 04-May-23</p>	<p>The field audit found that the best available estimate indicates that the database is not accurate within $\pm 5.0\%$. There is a 95% level of confidence that the installed capacity is between 3 and 9 kW lower than the database, and the annual consumption is between 12,600 and 39,000 p.a. kWh lower than the database indicates.</p> <p>January 2023 kW values were applied when calculating the March 2023 submission because a database extract was not provided in time for submission for March 2023. Use of the January kW values could have resulted in under submission of up to 254.49 kWh for March 2023.</p> <p>Six items of load do not have an ICP number recorded and are expected to have a DUML ICP number assigned, leading to an estimated under submission of 589 kWh per annum.</p> <p>Items of load do not have a gear wattage recorded in the database. 57 items of load are expected to have a non-zero gear wattage applied and adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission.</p> <p>The data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times</p> <p>Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time, but there is room for improvement.</p> <p>The impact is assessed to be medium based on the kWh volumes.</p>	
Actions taken to resolve the issue		Completion date
Genesis has reviewed the auditors finding and have highlighted these to STDC with the intent that STDC makes every effort to ensure that dataset is sent monthly, accurately maintained and gear wattage is provided.		Continuous Improvement
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis will send monthly reminders to STDC requesting the dataset and will report exceptions identified		Continuous Improvement
Remedial action status		
Identified		

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 13-Apr-23 To: 13-Apr-23	Six items of load do not have an ICP number recorded. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate. There are checks in place for missing ICP numbers which focus on records changed within the last month, but the process could be improved by checking for any lights with missing ICP numbers. The impact on settlement and participants is minor. The lights with missing ICP numbers total 138 W or 589 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have advised STDC of the discrepancy with the intent that STDC takes every effort to ensure the exceptions are rectified	20/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis relies on STDC to accurately maintain its database.	20/08/2023	

Location of each item of load	
Non-compliance	Description
Audit Ref: 2.3 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 13-Apr-23 To: 13-Apr-23	Two of the 2,295 items of load connected to DUMML ICPs do not have sufficient location information recorded to allow them to be readily located. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating
Low	The controls are recorded as strong, because two items of load are affected. The impact is low. If lights cannot be located, the accuracy of database records cannot be verified and it may be difficult to identify the correct record to update when maintenance occurs.

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has brought this to the attention of STDC with the intent that this gets looked into and accurate information if added in RAMM	20/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis relies on STDC to accurately maintain its database.	20/08/2023	

Description and capacity of load	
Non-compliance	Description
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 13-Apr-23</p> <p>To: 13-Apr-23</p>	<p>Items of load do not have a gear wattage recorded in the database. 57 items of load are expected to have a non-zero gear wattage applied and adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission.</p> <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>The controls are rated as moderate. Although gear wattages are maintained in a separate table and applied prior to sending the database extract to Genesis, they are not recorded in the database itself.</p> <p>There is no impact on submission because the wattages are corrected to account for gear wattages before the database extract is provided to Genesis each month.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has brought this to the attention of STDC in May-2023 and again this month with the intent that STDC makes every effort to ensure gear wattage is provided	20/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis relies on STDC to accurately maintain its database.	20/08/2023	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 13-Apr-23 To: 04-May-23	One additional Orangetek – TerraLED 21W 4000k (pole number 0243) was found outside Hawera Kindergarten on Kauri Street. One TerraLED 21W 4000k (pole ID 7775) was not recorded in the database with an ICP number and was therefore excluded from the database count for DUML ICPs. Potential impact: Low Actual impact: Low Audit history: Multiple times 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 ensure that the data is recorded correctly most of the time. The impact is assessed to be low due to the small number of 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
Genesis has brought this to the attention of STDC with the intent that required action is taken and RAMM gets updated accordingly		20/08/2023
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis relies on STDC to accurately maintain its database.		20/08/2023
Remedial action status		
Identified		

Database accuracy	
Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 13-Apr-23 To: 04-May-23	The field audit found that the best available estimate indicates that the database is not accurate within $\pm 5.0\%$. There is a 95% level of confidence that the installed capacity is between 3 and 9 kW lower than the database, and the annual consumption is between 12,600 and 39,000 p.a. kWh lower than the database indicates. Six items of load do not have an ICP number recorded and are expected to have a DUML ICP number assigned, leading to an estimated under submission of 589 kWh per annum. Items of load do not have a gear wattage recorded in the database. 57 items of load are expected to have a non-zero gear wattage applied and adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission. Potential impact: Low Actual impact: Low Audit history: Once Controls: Moderate Breach risk rating: 4

Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be medium based on the kWh volumes.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has reviewed the auditors finding and have highlighted these to STDC with the intent that STDC makes every effort to ensure that dataset is sent monthly, accurately maintained and gear wattage is provided.</p>		<p>Continuous Improvement</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis will send monthly reminders to STDC requesting the dataset and will report exceptions identified</p>		<p>Continuous Improvement</p>	

Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 13-Apr-23 To: 04-May-23</p>	<p>The field audit found that the best available estimate indicates that the database is not accurate within $\pm 5.0\%$. There is a 95% level of confidence that the installed capacity is between 3 and 9 kW lower than the database, and the annual consumption is between 12,600 and 39,000 p.a. kWh lower than the database indicates.</p> <p>Six items of load do not have an ICP number recorded and are expected to have a DUMML ICP number assigned, leading to an estimated under submission of 589 kWh per annum.</p> <p>January 2023 kW values were applied when calculating the March 2023 submission because a database extract was not provided in time for submission for March 2023. Use of the January kW values could have resulted in under submission of up to 254.49 kWh for March 2023.</p> <p>Items of load do not have a gear wattage recorded in the database. 57 items of load are expected to have a non-zero gear wattage applied and adjusted wattages (including the correct gear wattage) are applied to the monthly extract to RAMM prior to submission.</p> <p>The data used for submission does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Low Actual impact: Low Audit history: Three times Controls: Moderate Breach risk rating: 4</p>
Audit risk rating	Rationale for audit risk rating
Medium	<p>Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time, but there is room for improvement.</p> <p>The impact is assessed to be medium based on the kWh volumes.</p>

Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has reviewed the auditors finding and have highlighted these to STDC with the intent that STDC makes every effort to ensure that dataset is sent monthly, accurately maintained and gear wattage is provided.	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will send monthly reminders to STDC requesting the dataset and will report exceptions identified	Continuous Improvement	