

Compliance plan for Vodafone DUML 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: 11(1) of Schedule 15.3</p> <p>From: 01-May-22 To: 31-Mar-23</p>	<p>Over submission of 89,805 kWh per annum due to incorrect daily kWh values derived for Alpha units where primary measurements are available in the database.</p> <p>Incorrect submission for Auckland and Christchurch ICPs.</p> <p>Potential impact: High Actual impact: High</p> <p>Audit history: Once Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls in place are rated as moderate because the initial application of the adjustment factor was checked for accuracy prior to being applied.</p> <p>The impact is assessed to be high based on the over submission of 89,805 kWh per annum.</p>	
Actions taken to resolve the issue		Completion date
<p>We will correct and do a revision so that the 72% factor is only applied to the alpha cabinets with secondary measurements, not the ones where primary measurements have been taken.</p> <p>We will liaise with Vodafone to conduct primary measurements to confirm the accuracy of the daily kWh figures in Christchurch and Auckland.</p>		May 2023
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Mercury and Vodafone have worked hard to ensure that the database is as accurate as possible; we will continue to collaborate to resolve any accuracy issues.</p>		Ongoing
Remedial action status		
Identified		

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: 15.2 and 15.37B(b)</p> <p>From: 01-May-22</p> <p>To: 31-Mar-23</p>	<p>Over submission of 89,805 kWh per annum due to incorrect daily kWh values derived for Alpha units where primary measurements are available in the database</p> <p>Incorrect submission for Auckland and Christchurch ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls in place are rated as moderate because the initial application of the adjustment factor was checked for accuracy prior to being applied.</p> <p>The impact is assessed to be high based on the over submission of 89,805 kWh per annum.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>We will correct and do a revision so that the 72% factor is only applied to the alpha cabinets with secondary measurements, not the ones where primary measurements have been taken.</p> <p>We will liaise with Vodafone to conduct primary measurements to confirm the accuracy of the daily kWh figures in Christchurch and Auckland.</p>		May 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Mercury and Vodafone have worked hard to ensure that the database is as accurate as possible; we will continue to collaborate to resolve any accuracy issues.</p>		Ongoing	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: 15.2 and 15.37B(c)</p> <p>From: 01-May-22</p> <p>To: 31-Mar-23</p>	<p>Over submission of 89,805 kWh per annum due to incorrect daily kWh values derived for Alpha units where primary measurements are available in the database</p> <p>Incorrect submission for Auckland and Christchurch ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls in place are rated as moderate because the initial application of the adjustment factor was checked for accuracy prior to being applied.</p> <p>The impact is assessed to be high based on the over submission of 89,805 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We will correct and do a revision so that the 72% factor is only applied to the alpha cabinets with secondary measurements, not the ones where primary measurements have been taken.</p> <p>We will liaise with Vodafone to conduct primary measurements to confirm the accuracy of the daily kWh figures in Christchurch and Auckland.</p>	May 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Mercury and Vodafone have worked hard to ensure that the database is as accurate as possible; we will continue to collaborate to resolve any accuracy issues.	Ongoing	