

ELECTRICITY INDUSTRY PARTICIPATION CODE
DISTRIBUTED UNMETERED LOAD AUDIT REPORT



VERITEK

For

WELLINGTON ADVERTISING SIGNS AND
PRIME ENERGY LIMITED

Prepared by: Bernie Cross

Date audit commenced: 21 March 2023

Date audit report completed: 31 May 2023

Audit report due date: 1 June 2023

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EXECUTIVE SUMMARY

This audit of the **Wellington Advertising Signs** DUML database and processes was conducted at the request of **Prime Energy Limited (Prime)** in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied. The billboards included in this database relate to the night operation of floodlights to illuminate these signs.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A database exists in the form of a spreadsheet, and it has an audit trail. A new sheet is saved if any changes are made.

There have been no updates to the spreadsheet since March 2019, however, there have been a number of signs decommissioned, replaced with digital signs or where the lighting fixtures have been removed since the last audit.

This audit found five non-compliances and makes one recommendation. Three of the non-compliances relate to changes not being tracked in the database as expected. I have recommended that this process is reviewed.

The future risk rating of 25 indicates that the next audit be in three months. I have considered this in conjunction with Prime's comments, the size and potential impact on the market and that database has now been updated to reflect the additional lights and I recommend that the next audit be in nine months.

The matters raised are detailed in the table below.

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	11(1) of Schedule 15.3	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 29,547 kWh per annum.	Weak	Medium	6	Identified
All load recorded in database	2.5	11(2A) of Schedule 15.3	17 additional items of load identified in the field were not recorded in the database.	Weak	Medium	6	Identified
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify the user who made the data change.	Strong	Low	1	Identified
Database accuracy	3.1	15.2 and 15.37B(b)	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated under submission of 29,547 kWh per annum. The site labelled Main Hutt Road, Petone incorrectly assigned to WIL0331 not GFD0331.	Weak	Medium	6	Identified
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated under submission of 29,547 kWh per annum. The site labelled Main Hutt Road, Petone incorrectly assigned to WIL0331 not GFD0331.	Weak	Medium	6	Identified
Future Risk Rating						25	

Future risk rating	0	1-4	5-8	9-15	16-18	19+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Clause	Recommendation
Review the change management process.	3.2	15.2 and 15.37B(c)	Recommend that the change management process is reviewed to ensure all changes in the field are being reported to Prime in a timely manner.

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

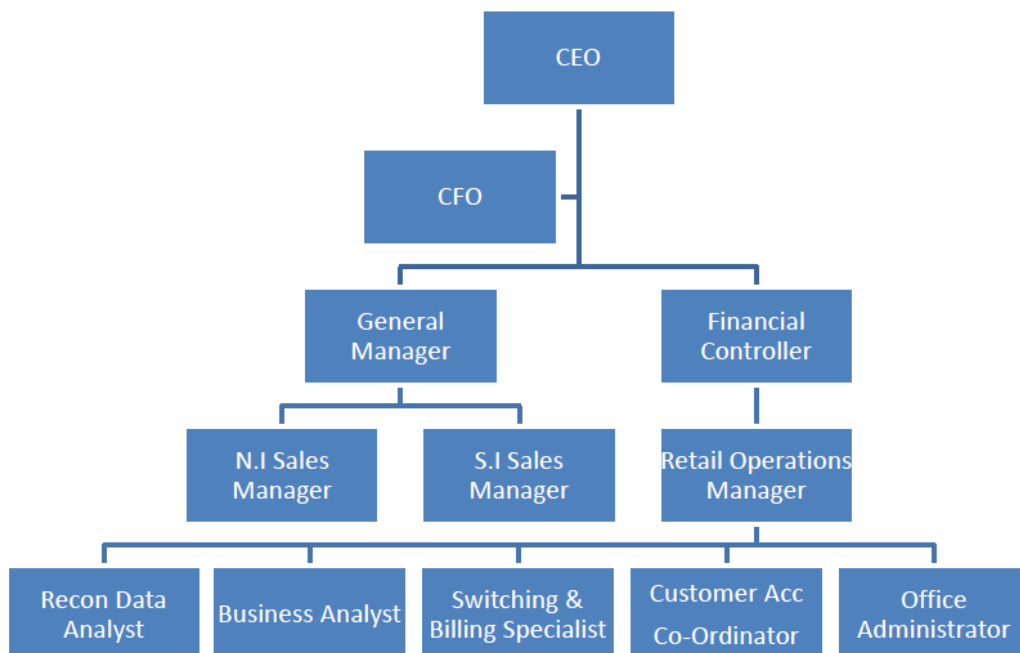
Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Prime provided a copy of their organisational structure.

Prime Energy Organizational Structure



1.3. Persons involved in this audit

Auditor:

Bernie Cross

Veritek Limited

Electricity Authority Approved Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Jackson Luo	Business Analyst	Prime

1.4. Hardware and Software

Data is contained in a spreadsheet managed by Prime and APN (the customer for the DUML). The customer notifies Prime of any changes by providing a revised spreadsheet.

Backup is in accordance with standard industry protocols, with Amazon and in-house backups performed.

Systems used by the trader to calculate submissions are assessed as part of their reconciliation participant audits.

1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

1.6. ICP Data

ICP Number	Description	NSP	Number of items of load	Database wattage (watts)	Daily kWh
0000156503CK186	APN CPK0331	CPK0331	35	25,722	47.032
0001259564UN4AC	APN WIL0331	WIL0331	19	13,183	24.941
Total			54	38,905	

1.7. Authorisation Received

All information was provided directly by Prime.

1.8. Scope of Audit

This audit of the Wellington Advertising Signs DUML database and processes was conducted at the request of Prime Energy Limited (Prime) in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

A database exists in the form of a spreadsheet, and it has an audit trail. A new sheet is saved if any changes are made.

1.9. Summary of previous audit

I reviewed the last audit report undertaken by Rebecca Elliot of Veritek Limited in May 2021. The table below records the current status of those findings.

Table of Non-Compliance

Subject	Section	Clause	Non-compliance	Status
DUML audit	1.10	16A.26	Audit conducted late for database.	Cleared
Deriving submission information	2.1	11(1) of Schedule 15.3	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 1,951 kWh per annum.	Still existing
Audit trails	2.7	11(4) of Schedule 15.3	The available audit trails do not specify the user who made the data change.	Still existing
Database accuracy	3.1	15.2 and 15.37B(b)	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 1,951 kWh per annum.	Still existing
Volume information accuracy	3.2	15.2 and 15.37B(c)	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 1,951 kWh per annum.	Still existing

1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

- 1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)*
- 2. within three months of submission to the reconciliation manager (for new DUML)*
- 3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.*

Audit observation

Prime have requested Veritek to undertake this DUML audit.

Audit commentary

The completion of this audit report confirms compliance with this clause.

Audit outcome

Compliant

2. DUMML DATABASE REQUIREMENTS

2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- DUMML database is up to date,
- methodology for deriving submission information complies with Schedule 15.5.

Audit observation

The process for calculation of consumption was examined.

Audit commentary

Prime reconciles this DUMML load using the RPS profile. The kW figures are derived from the database, and it is assumed the hours of operation each day are 11.877, which is a reasonable average compared to streetlight on/off times in the same area. Whilst the RPS profile is not the most suitable profile for night only lighting, the Code allows it to be used.

The submission totals were checked for March 2023 and no differences were found as shown in the table below.

ICP	March 2023 kW	Burn hours	Calculated kWh	March 2023 kWh submitted
0000156503CK186	25.772	368.187	1,457.99	1458
0001259564UN4AC	13.183	368.187	773.17	774

The field audit found that the database accuracy did not fall within the allowable +/-5% threshold. This is recorded as non-compliance and will be resulting in an estimated under submission of 29,547 kWh per annum.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 01-May-21 To: 31-Mar-23	The database is outside the allowable +/-5% accuracy threshold resulting in an estimated over submission of 29,547 kWh per annum. Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak as the change management process requires review. The impact is assessed to be medium, based on the kWh values described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Will request customer to report back with any work completed with fittings and wattage ratings to more accurately calculate kWh per annum.		30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
New allocated staff will communicate regularly with customer on an agreed schedule to request reports on any updates to the supplied sites.		30/06/2023	

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUML database must contain:

- *each ICP identifier for which the retailer is responsible for the DUML,*
- *the items of load associated with the ICP identifier.*

Audit observation

The database was checked to confirm an ICP is recorded for each item of load.

Audit commentary

An ICP is recorded for each item of load in the database.

Audit outcome

Compliant

2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

The DUML database must contain the location of each DUML item.

Audit observation

The database was checked to confirm the location is recorded for all items of load.

Audit commentary

The spreadsheet contains a street address and a photo of each item of load so it can be located.

Audit outcome

Compliant

2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

Code reference

Clause 11(2)(c) and (d) of Schedule 15.3

Code related audit information

The DUML database must contain:

- *a description of load type for each item of load and any assumptions regarding the capacity*
- *the capacity of each item in watts.*

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage.

Audit commentary

The spreadsheet contains a description of the sign, count of the light fittings inside each sign with an estimation of wattage per light, total wattage and kWh per day.

The accuracy of lamp descriptions, wattages and ballasts is recorded in **section 3.1**.

Audit outcome

Compliant

2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.

Audit observation

A field audit was undertaken of all items of load.

Audit commentary

The field audit found several discrepancies as detailed in the table below:

Location	Sign ID	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
ICP 0000156503CK186						
95 Ghuznee St	0050602	2	2	0	2	2 x 400w (438w) Metal Halide lights incorrectly recorded as 120w lights.
131 Manners St	0042201	1	0	-1	0	No light located here. Now non illuminated sign
80 Adelaide Rd, Mt Cook	0050101	2	0	-2	0	Site now used by another party.
Corner of Tory & Vivian St	0050201	1	0	-1	0	No light located here. Now non illuminated sign
Cnr Moxham Ave & Taurima St	0050901	0	0	0	0	Record in spreadsheet but light removed prior to previous audit.
Cnr Manners & Cuba Mall	0079901 0079902	2	2	0	2	2 x 400w (438w) Metal Halide lights incorrectly recorded as 120w lights.
Cnr Dixon St & Cuba Mall	0080601 0080602	2	0	-2	0	Site now used by another party.
Boulcott St	0078301	1	1	0	1	1 x 400w (438w) Metal Halide light incorrectly recorded as 120w light.
Boulcott St, Wellington Central	0052001 0052002	4	2	-2	2	2 x 120w Phillips Tango LED lights incorrectly recorded as 110w lights. 2 x 110W lights not found in the field
Kent Terrace	0058501	0	0	0	0	Record in spreadsheet but light removed prior to previous audit.
181 Wakefield St	0041602	5	5	0	5	5 x 400w (438w) Metal Halide lights incorrectly recorded as 120w lights.
79 Taranaki St	0051201	3	0	-3	0	Billboard replaced with digital and now metered on separate ICP.
53 Cuba St, Wellington	0041401	1	0	-1	0	No light located here. Now non illuminated sign
190 Lambton Quay	0041801	3	3	0	3	3 x 400w (438w) Metal Halide lights incorrectly recorded as 120w lights.
104 The Terrace	0009202	2	2	0	2	2 x 400w (438w) Metal Halide lights incorrectly recorded as 120w lights.
89 Ghuznee St	0050602	2	0	-2	0	Billboard replaced with digital and now metered on separate ICP.
15 Adelaide Rd	0076201	1	0	-1	0	Billboard replaced with digital and now metered on separate ICP.
160 Adelaide Rd	0077901	2	2	0	2	2 x 400w (438w) Metal Halide lights incorrectly recorded as 110w lights.

Location	Sign ID	Database count	Field count	Light count differences	Wattage recorded incorrectly	Comments
Manners St	0078201	1	0	-1	0	No light located here. Now non illuminated sign
ICP 0001259564UN4AC						
Aotea Quay, Wgtn Central	0012401	2	2	0	2	2 x 400w (438w) Metal Halide lights incorrectly recorded as 110w lights.
Main Hutt Rd	0011801 0011802 0011803 0011804 0011805 0011806 0011807 0011808	8	3	-5	3	5 lights removed – billboards decommissioned. 3 x 400w (438w) Metal Halide lights incorrectly recorded as 110w lights.
Thorndon Quay, Wellington Central	0009601	1	0	-1	0	Billboard replaced with digital and now metered on separate ICP.
85 Hutt Rd, Wellington	0011101	0	3	+3	0	3 x 400w (438w) Metal Halide lights sighted – bottom mounted as base of billboard.
Custom House 17-21 Whitmore St	0032301	2	2	0	2	2 x 120w Phillips Tango LED lights incorrectly recorded as 110w lights.
Cnr Whitmore & Stout Streets		0	1	+1	0	1 x 400w (438w) Metal Halide light sighted.
154 The Terrace	0032601 0032602	2	0	-2	0	Prime now advised that billboards are tenant billed by landlord so not part of DUML database.
Murphy St		1	0	-1	0	No light located here. Now non illuminated sign
The Terrace Off-Ramp		1	0	-1	0	Billboard replaced with digital and now metered on separate ICP.
Waterloo Quay		1	0	-1	0	Billboard replaced with digital and now metered on separate ICP.
162 Thorndon Quay		1	14	+13	1	1 x 72w 1200mm Fluro incorrectly recorded as 110w light. 13 x 1200mm 72w Fluro not recorded in the database
Grand Total		54	44	44 (+17, - 27)	27	

17 additional items of load were located. The database accuracy is detailed in **section 3.1**.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-May-21 To: 31-Mar-23	17 additional items of load identified in the field were not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak as the change management process requires review. The impact is assessed to be medium, based number of differences identified across the entire database population.		
Actions taken to resolve the issue		Completion date	Remedial action status
Updated database to match auditor findings		TBC – pending audit update	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Previous staff managing DUMML has left the company, new staff will be assigned to oversee and regularly communicate with customer for updates.		TBC	

2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

The DUMML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

Audit observation

The ability of the database to track changes was assessed and the process for tracking of changes in the database was examined.

Audit commentary

The spreadsheet tracks changes at a daily level.

Audit outcome

Compliant

2.7. Audit trail (Clause 11(4) of Schedule 15.3)

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

The DUML database must incorporate an audit trail of all additions and changes that identify:

- the before and after values for changes
- the date and time of the change or addition
- the person who made the addition or change to the database.

Audit observation

The database was checked for audit trails.

Audit commentary

The spreadsheet contains an audit trail of all additions and changes. A new sheet is created when any changes are made, however the user is not specified. This is recorded as non-compliance.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 01-May-21 To: 31-Mar-23	The available audit trails do not specify the user who made the data change. Potential impact: Low Actual impact: None Audit history: Once Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong, because there is typically one person who updates the spreadsheet. The impact is assessed to be low based on the nature and type of the non-compliance.		
Actions taken to resolve the issue		Completion date	Remedial action status
Previously only one staff was responsible for the database and others had no access, the identification of the user was implied.		N/A	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Previous staff has since left the company and a new staff will be assigned to this role, new fields will be added to future spreadsheets to clearly the identified the user and time of when changes were made.		30/06/2023	

3. ACCURACY OF DUML DATABASE

3.1. Database accuracy (Clause 15.2 and 15.37B(b))

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

Audit observation

A full field audit was undertaken. The change management processes were reviewed, and the determination of wattage was confirmed.

Audit commentary

The field audit found 14 billboard sites had either been removed, partially removed or were not in use. 17 additional items of load were identified as detailed in **section 2.5**.

Lamp description and capacity accuracy

The database contains wattage values of either 110 or 120 watts, but no lamp make or model descriptions. Using a telephoto lens, I was able to view the nameplate details of a sample of the lights and using the same shape of the light fixtures I have been able to allocate a reasonable assessment of the load at each billboard location. This assessment of the onsite lighting load has resulted in an estimated under submission of 29,547 kWh per annum or 53% under submission. This is outside of the allowable +/-5% accuracy threshold. This is recorded as non-compliance below.

Change management process findings.

The last change to the database is recorded as 1 July 2019. As part of this audit Prime acquired a revised spreadsheet of illuminated billboards from their customer which identified a number of sites where these billboards have either been replaced with new digital signs that are metered, or billboards that have been decommissioned/lights have been removed.

A recommendation is recorded in **section 3.2** that the change management process is reviewed as not all changes in the field are being reported to Prime in a timely manner.

ICP accuracy

The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC which is allocated to NSP WIL0331 CKHK. However, all other ICPs on this street are assigned to NSP GD0331 indicating that the load for this billboard is being submitted against the incorrect NSP. I recommend that Prime Energy works with the customer and Wellington Electricity to confirm the correct NSP for this billboard and, if required, create a new ICP to correctly allocate this load to the correct NSP.

Audit outcome

Non-compliant

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 01-May-21 To: 31-Mar-23	<p>The database is outside the allowable +/-5% accuracy threshold resulting in an estimated under submission of 29,547 kWh per annum.</p> <p>The site labelled Main Hutt Road, Petone incorrectly assigned to WIL0331 not GFD0331.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak as the change management process requires review.</p> <p>The impact is assessed to be medium, based on the kWh values described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Network to be contacted and confirm allocated NSP is correct. Database to be updated to audit findings and customer response to more accurately represent what is physically onsite.</p> <p>Will request customer to report back with any work completed with fittings and wattage ratings to more accurately calculate kWh per annum.</p>		30/06/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>New allocated staff will communicate regularly with customer on an agreed schedule to request reports on any updates to the supplied sites.</p>		30/06/2023	

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- volume information for the DUML is being calculated accurately,
- profiles for DUML have been correctly applied.

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that all ICPs have the correct profile and submission flag,

- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

As detailed in **section 2.1**, I checked the submission calculation provided by Prime Energy for March 2023 and found it matched a manual calculation of the connected load and the hours of operation as recorded by the streetlight logger.

The field audit found 14 billboard sites had either been removed, partially removed or were not in use. 17 additional items of load were identified as detailed in **section 2.5**.

Lamp description and capacity accuracy

The database contains wattage values of either 110 or 120 watts, but no lamp make or model descriptions. Using a telephoto lens, I was able to view the nameplate details of a sample of the lights and using the same shape of the light fixtures I have been able to allocate a reasonable assessment of the load at each billboard location. This assessment of the onsite lighting load has resulted in an estimated under submission of 29,547 kWh per annum or 53% under submission. This is outside of the allowable +/-5% accuracy threshold. This is recorded as non-compliance below.

Change management process findings.

The last change to the database is recorded as 1 July 2019. As part of this audit Prime acquired a revised spreadsheet of illuminated billboards from their customer which identified a number of sites where these billboards have either been replaced with new digital signs that are metered, or billboards that have been decommissioned/lights have been removed.

I recommend that the change management process is reviewed as not all changes in the field are being reported to Prime in a timely manner.

Recommendation	Description	Audited party comment	Remedial action
Review the change management process.	Recommend that the change management process is reviewed to ensure all changes in the field are being reported to Prime in a timely manner.	Process under review as previous staff in charge has left the company, new staff will request more regular communication/reports from customer for any field work taken	Identified

ICP accuracy

The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC which is allocated to NSP WIL0331 CKHK. However, all other ICPs on this street are assigned to NSP GD0331 indicating that the load for this billboard is being submitted against the incorrect NSP. I recommend that Prime Energy works with the customer and Wellington Electricity to confirm the correct NSP for this billboard and, if required, create a new ICP to correctly allocate this load to the correct NSP.

Audit outcome

Non-compliant

Non-compliance	Description
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<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-May-21 To: 31-Mar-23</p>	<p>The database is outside the allowable +/-5% accuracy threshold resulting in an estimated under submission of 29,547 kWh per annum.</p> <p>The site labelled Main Hutt Road, Petone incorrectly assigned to WIL0331 not GFD0331.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Once Controls: Weak Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
<p>Medium</p>	<p>The controls are rated as weak as the change management process requires review.</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>Network to be contacted and confirm allocated NSP is correct. Database to be updated to audit findings and customer response to more accurately represent what is physically onsite.</p> <p>Will request customer to report back with any work completed with fittings and wattage ratings to more accurately calculate kWh per annum.</p>		<p>30/06/2023</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>New allocated staff will communicate regularly with customer on an agreed schedule to request reports on any updates to the supplied sites.</p>		<p>30/06/2023</p>	

CONCLUSION

A database exists in the form of a spreadsheet, and it has an audit trail. A new sheet is saved if any changes are made.

There have been no updates to the spreadsheet since March 2019, however, there have been a number of signs decommissioned, replaced with digital signs or where the lighting fixtures have been removed since the last audit.

This audit found five non-compliances and makes one recommendation. Three of the non-compliances relate to changes not being tracked in the database as expected. I have recommended that this process is reviewed.

The future risk rating of 25 indicates that the next audit be in three months. I have considered this in conjunction with Prime's comments, the size and potential impact on the market and that database has now been updated to reflect the additional lights and I recommend that the next audit be in nine months.

PARTICIPANT RESPONSE