

Compliance Plan Kaikoura DC DUML 2022

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 15-Apr-21 To: 11-Apr-23	Late submission of report Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak because of limited availability of personnel. The impact is assessed to be low as there is no impact to submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
We encountered delays in receiving data that was usable for the purposes of submission; we could not complete the audit until we were able to receive usable data and complete a submission. Delays were compounded by Kaikoura DC having a relatively new staff member looking after DUML and being unable to assist when the staff member was on leave. We kept the EA informed of the delays.	May 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
N/A	N/A	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 15-Apr-21</p> <p>To: 11-Apr-23</p>	<p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Submission is based on database wattage and does not account for the new 25% dimming profile, resulting in an approximate over submission of 16,677 kWh per annum.</p> <p>In absolute terms, total annual consumption is estimated to be 2,800 kWh lower than the DUMML database indicates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</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 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
We will advise Kaikoura DC to update the database and are working with them so that we can account for dimming in our submissions.	July 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have new processes in place so that we are fully aware before a DUMML customer switches to us of whether they have dimming and whether they already have the requirements for dimming so appropriate action can be taken to ensure that we are submitting accurately.	March 2023	

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: 15-Apr-21 To: 11-Apr-23	No items of load have the ICP recorded against them in the database. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak because the ICP is not recorded in the database. The impact is assessed to be low as there is only one ICP so there is no impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will advise Kaikoura DC to update this in the database.	June 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Kaikoura DC are aware of the importance of the database being accurate.	Ongoing	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 15-Apr-21 To: 11-Apr-23	One additional light found in the field of the sample of 105 items of load checked. 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 they mitigate risk to an acceptable level. The impact is assessed to be low due to one additional light 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
We will advise Kaikoura DC to update this in the database.	June 2023	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
Kaikoura DC are aware of the importance of the database being accurate.	Ongoing	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 15-Apr-21 To: 11-Apr-23	In absolute terms, total annual consumption is estimated to be 2,800 kWh lower than the DUML database indicates. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be low due to the impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
We will advise Kaikoura DC to update the database and are working with them so that we can account for dimming in our submissions.	July 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Kaikoura DC are aware of the importance of the database being accurate.	Ongoing	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 15-Apr-21</p> <p>To: 11-Apr-23</p>	<p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Submission is based on database wattage and does not account for the new 25% dimming profile, resulting in an approximate over submission of 16,677 kWh per annum.</p> <p>In absolute terms, total annual consumption is estimated to be 2,800 kWh lower than the DUMML database indicates.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Twice</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 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
We will advise Kaikoura DC to update the database and are working with them so that we can account for dimming in our submissions.	July 2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Kaikoura DC are aware of the importance of the database being accurate.	Ongoing	