

Compliance plan for Waka Kotahi Aurora DUML and Manawa Energy July 2023

Distributed unmetered load audits		
Non-compliance	Description	
<p>Audit Ref: 1.10</p> <p>With: Clause 16A.26 and 17.295F</p> <p>From: 31-Mar-23</p> <p>To: 30-Jun-23</p>	<p>Audit conducted late.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history:</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>Revisions required as a result of previous audits have not been conducted because Manawa was waiting for this database to be provided and audited, therefore the impact is moderate.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Submit completed audit	31/07/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa has implemented a new compliance management system called Totum which is now live. Totum allows us to track Audit due dates, and follow up actions from completed audits, transparently; it also gives us the ability to assign responsibility to these actions.</p> <p>Totum has been live since March 2023</p>	Complete	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Mar-22 To: 30-Jun-23</p>	<p>Revisions not carried out for duplicated lights resulting in an estimated over submission of 23,121 kWh over the available 14-month revision period.</p> <p>Revisions not carried out to correct the volumes for the available 14-month revision period resulting in approximately 17,103 kWh of submission against the incorrect balancing area.</p> <p>Inaccurate database resulting in under submission of 52,100 kWh per annum.</p> <p>Submission is based on a snapshot at the end of each month and does not consider changes made during the month.</p> <p>Potential impact: High Actual impact: High Audit history: Three times Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak because they do not mitigate risk and inaccuracies to an acceptable level.</p> <p>The audit risk rating is assessed to be high due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Updated database and identified discrepancies to be added to SLIM system; this will be used to conduct revisions of previous reconciliations which will resolve the incorrect submissions for each balancing area for the available 14 months.</p> <p>Updates within the SLIM system will be completed before revisions are due for submission in August.</p>	04/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and to improve Database maintenance processes. We will also work with WK to continue their work to amalgamate and update the Otago area ICPs into one database.</p>	01/04/2024	

All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 01-Mar-22</p> <p>To: 30-Jun-23</p>	<p>Seven additional lights found in the field.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak because they do not mitigate risk and inaccuracies to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and use the updated database to update our records within the SLIM system.</p> <p>Updates within the SLIM system will be completed before revisions are due for submission in August.</p>	04/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and to improve Database maintenance processes. We will also work with WK to continue their work to amalgamate and update the Otago area ICPs into one database.</p>	01/04/2024	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Mar-22</p> <p>To: 30-Jun-23</p>	<p>Inaccurate database resulting in under submission of 52,100 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak because they do not mitigate risk and inaccuracies to an acceptable level.</p> <p>The audit risk rating is assessed to be high due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and use the updated database to update our records within the SLIM system.</p> <p>Updates within the SLIM system will be completed before revisions are due for submission in August.</p>	04/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and to improve Database maintenance processes. We will also work with WK to continue their work to amalgamate and update the Otago area ICPS into one database.</p>	01/04/2024	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Mar-22</p> <p>To: 30-Jun-23</p>	<p>Revisions not carried out for duplicated lights resulting in an estimated over submission of 23,121 kWh over the available 14-month revision period.</p> <p>Revisions not carried out to correct the volumes for the available 14-month revision period resulting in approximately 17,103 kWh of submission against the incorrect balancing area.</p> <p>Inaccurate database resulting in under submission of 52,100 kWh per annum.</p> <p>Submission is based on a snapshot at the end of each month and does not consider changes made during the month.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak because they do not mitigate risk and inaccuracies to an acceptable level.</p> <p>The audit risk rating is assessed to be high due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and use the updated database to update our records within the SLIM system; this will be used to conduct revisions of previous reconciliations which will resolve the incorrect submissions for each balancing area within the available 14-month revision period.</p> <p>Updates within the SLIM system will be completed before revisions are due for submission in August.</p>	10/08/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa to work with Waka Kotahi to update RAMM with lamp discrepancies identified in this audit and to improve Database maintenance processes. We will also work with WK to continue their work to amalgamate and update the Otago area ICPs into one database.</p> <p>Manawa has also implemented the new compliance management system Totum which will give additional transparency and traceability of audit actions.</p> <p>Totum has been live since March 2023</p>	01/04/2024	