## Compliance plan for Porirua City Council DUML July 2023

Deriving Submission Information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 109,400 kWh p.a.  Eight items of load are not readily locatable.  One item of load with the incorrect ballast applied resulting in an estimated under submission of 8.542 kWh.  208 private lights not recorded against an ICP or included in submission resulting in an annual under submission of approximately 61,000 kWh.  Livening dates not recorded for new connections.	
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.  Potential impact: High  Actual impact: High  Audit history: Multiple times	
From: 01-Feb-23 To: 30-Jun-23	Controls: Moderate  Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as moderate as improvements have been undertaken to capture and maintain the database attributes and PCC is investigating developing a policy around the management of private lights.  The audit risk rating is high based on kWh variances.	

Actions taken to resolve the issue	Completion date	Remedial action status
Eight items of load – PCC will update this information once the AMDS migration as Road allocation in RAMM is disabled.	31/10 2023	Identified
One item of load with the incorrect ballast – PCC has now corrected.	24/7/2023	
208 private lights – PCC met with WE and are collaborating on a solution to fix this issue.	31/10/2023	
Livening dates not recorded for new connections – Meridian and PCC are currently reviewing the new connections process for improvement on notifications and updates.	31/10/2023	
Preventative actions taken to ensure no further issues will occur	Completion date	
Meridian will continue to follow up and work with PCC in amending the inaccuracies in the database.	31/10/2023	
We have assessed our processes and tools to account for historic lamp installations and changes to the database at a daily level. There are checks in place comparing month to month data to identify any material changes and confirm details for these. These are accounted for in monthly submission.	Ongoing	

ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2 With: Clause 11(2)(a)	ICP assignment is not correct for all items of load resulting in incorrect allocation of submission volumes to the respective NSP.		
and (aa) of Schedule 15.3	208 private lights not recorded against an ICP or included in submission result in an annual under submission of approximately 61,000 kWh.		
	Potential impact: High		
	Actual impact: High		
	Audit history: None		
From: 01-Feb-23	Controls: Moderate		
To: 30-Jun-23	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are recorded as moderate as most lights are assigned an ICP on entry to the database.		
	The impact is rated as high as the volume impacted is large due to the missing private lights from submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
Meridian is currently working with WE to assign the items of load to the correct NSP's.		31/10/2023	Identified
PCC met with WE and are collaborating on a solution to fix this issue.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Meridian will continue to follow up and work with PCC in amending the inaccuracies in the database.		31/10/2023	

Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3 With: Clause 11(2)(b)	Eight items of load do not have sufficient location information to enable them to be readily locatable.		
of Schedule 15.3	Potential impact: Low		
	Actual impact: Low		
	Audit history: Multiple times		
From: 01-Feb-23	Controls: Moderate		
To: 30-Jun-23	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as while no new lights have been added without sufficient location information being provided, there has been no progress to resolve the exceptions identified from previous audits. PCC are working on a solution to create a virtual road which will then allow these lights to be correctly reflected and located in the RAMM database.  The impact is rated as low as there are only eight items of load that are not readily locatable.		
Actions taken to resolve the issue		Completion date	Remedial action status
PCC will update this information once the AMDS migration as Road allocation in RAMM is disabled.		31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Meridian will continue to follow up and work with PCC in amending the inaccuracies in the database.		31/10/2023	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3	11 additional lamps (4%) in the field were not recorded in the database from a sample of 261 items of load.  Potential impact: Low		
	Actual impact: Low		
	Audit history: Multiple times		
From: 01-Feb-23	Controls: Moderate		
To: 30-Jun-23	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as moderate as the recent field activity of light installations and changes do not appear to have been reflected in the database since the last audit.  The audit risk rating is low based on the small volume of lights affected in		
	relation to the sample examined.		
Actions taken to resolve the issue		Completion date	Remedial action status
PCC had been advised of the inaccuracies during a meeting. PCC has since confirmed correction of the inaccuracies.		24/7/2023	Cleared
Preventative actions to	aken to ensure no further issues will occur	Completion date	

Database Accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and	Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 109,400 kWh p.a.	
15.37B(b)	Eight items of load are not readily locatable.	
	ICP assignment is not correct for all items of load resulting in incorrect allocation of submission volumes to the respective NSP.	
	208 private lights not recorded against an ICP or included in submission resulting in an annual under submission of approximately 61,000 kWh.	
	One item of load with the incorrect ballast applied resulting in an estimated under submission of 8.542 kWh.	
	Livening dates not recorded for new connections.	
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.	
	Potential impact: High	
	Actual impact: High	
	Audit history: Multiple times	
From: 01-Feb-23	Controls: Moderate	
To: 30-Jun-23	Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
High	The controls are rated as moderate as improvements have been undertaken to capture and maintain the database attributes and PCC is investigating developing a policy around the management of private lights.	
	The audit risk rating is high based on kWh variances.	

Actions taken to resolve the issue	Completion date	Remedial action status
Eight items of load – PCC will update this information once the AMDS migration as Road allocation in RAMM is disabled.	31/10/2023	Identified
ICP Assignment for incorrect NSP - Meridian is currently working with WE to assign the items of load to the correct NSP's.	31/10/2023	
One item of load with the incorrect ballast – PCC has now corrected.	24/7/2023	
208 private lights – PCC met with WE and are collaborating on a solution to fix this issue.	31/10/2023	
Livening dates not recorded for new connections – Meridian and PCC are currently reviewing the new connections process for improvement on notifications and updates.	31/10/2023	
Preventative actions taken to ensure no further issues will occur	Completion date	
Meridian will continue to follow up and work with PCC in amending the inaccuracies in the database.	31/10/2023	
We have assessed our processes and tools to account for historic lamp installations and changes to the database at a daily level. There are checks in place comparing month to month data to identify any material changes and confirm details for these. These are accounted for in monthly submission.	Ongoing	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and	Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 109,400 kWh p.a.		
15.37B(c)	Eight items of load are not readily locatable.		
	208 private lights not recorded against an ICP or included in submission resulting in an annual under submission of approximately 61,000 kWh.		
	One item of load with the incorrect ballast applied resulting in an estimated under submission of 8.542 kWh.		
	Livening dates not recorded for new connections.		
	Potential impact: High		
	Actual impact: High		
	Audit history: Multiple times		
From: 01-Feb-23	Controls: Moderate		
To: 30-Jun-23	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate as improvements have been undertaken to capture and maintain the database attributes and PCC is investigating developing a policy around the management of private lights.		
	The audit risk rating is high based on kWh variances.		
Actions taken to resolve the issue		Completion date	Remedial action status
Eight items of load – PCC will update this information once the AMDS migration as Road allocation in RAMM is		31/10/2023	Identified
One item of load with the incorrect ballast – PCC has now corrected.		24/7/2023	
208 private lights – PCC met with WE and are collaborating on a solution to fix this issue.		31/10/2023	
Livening dates not recorded for new connections – Meridian and PCC are currently reviewing the new connections process for improvement on notifications and updates.		31/10/2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
Meridian will continue to follow up and work with PCC in amending the inaccuracies in the database.		31/10/2023	