

Compliance plan for Waka Kotahi Otagonet 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: 01-Jun-18</p> <p>To: 29-Jun-23</p>	<p>Audit not conducted in accordance with the Code since 7 April 2016.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<p>Medium</p>	<p>The controls are recorded as weak because there was data available in the Waitaki DC database that could have been audited earlier than 2023.</p> <p>The impact on settlement and participants is moderate because under submission of approx. 5,000 kWh per annum has occurred for seven years, totaling 35,000 kWh, much of which is outside the 14-month revision cycle.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Submit completed audit</p>	<p>31/07/2023</p>	<p>Identified</p>
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>	<p>Complete</p>	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 07-Apr-16 To: 29-Jun-23</p>	<p>Inaccurate database information leading to annual under submission of 4,946 kWh per annum.</p> <p>15 lights were recorded against the incorrect ICP.</p> <p>Potential impact: Medium Actual impact: Low Audit history: None</p> <p>Controls: Weak Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak because there are not robust processes in place to ensure data is correct.</p> <p>The impact is assessed to be low, based on the kWh differences described in section 3.1.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Discrepancies and updated lamp information identified in this audit will be used to update our records within the SLIM system. We will then conduct revisions of previous reconciliations 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>	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: 07-Apr-16</p> <p>To: 29-Jun-23</p>	<p>16 additional lights in the field not in the database.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</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 there are not robust processes in place to ensure data is correct.</p> <p>The impact is assessed to be low, based on the kWh differences described in section 3.1.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Discrepancies and updated lamp information identified in this audit will be used to update our records within the SLIM system. We will then conduct revisions of previous reconciliations 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>	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	

Tracking of load changes			
Non-compliance	Description		
<p>Audit Ref: 2.6</p> <p>With: Clause 11(3) of Schedule 15.3</p> <p>From: 07-Apr-16</p> <p>To: 29-Jun-23</p>	<p>The spreadsheet for ICP 0001982641TG19E does not track load changes in accordance with this clause.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>The controls are recorded as strong for ICP 0001982403TG9B9 but there is no process in place for ICP 0001982641TG19E, therefore the controls are moderate overall.</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 request additional information regarding load changes for ICP 0001982641TG19E where possible. We recognise due to a lack of maintenance on this database additional information may be difficult to identify.</p> <p>Any additional information received will be applied to SLIM and used to revise submissions within the available 14 months.</p>		31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Manawa to work with Waka Kotahi to apply the same process for tracking load changes across all ICPs, so that calculation of consumption is consistent and accurate.</p>		31/10/2023	

Audit trail		
Non-compliance	Description	
<p>Audit Ref: 2.7</p> <p>With: Clause 11(4) of Schedule 15.3</p> <p>From: 07-Apr-16</p> <p>To: 29-Jun-23</p>	<p>The spreadsheet for ICP 0001982641TG19E does not have an audit trail.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as strong for ICP 0001982403TG9B9 but there is no process in place for ICP 0001982641TG19E, therefore the controls are moderate overall.</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
Manawa to request additional information regarding the audit trail for ICP 0001982641TG19E from WK. We recognise due to a lack of maintenance on this database additional information may be difficult to identify.	31/10/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Manawa to work with Waka Kotahi to apply the same audit trail process across all ICPs.	31/10/2023	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 07-Apr-16</p> <p>To: 29-Jun-23</p>	<p>Inaccurate database information leading to annual under submission of 4,946 kWh per annum.</p> <p>15 lights were recorded against the incorrect ICP.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</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 historically there has not been robust processes in place to ensure data is correct.</p> <p>The impact is assessed to be low, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Discrepancies and updated lamp information identified in this audit will be used to update our records within the SLIM system. We will then conduct revisions of previous reconciliations 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>	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 and will advise them of the risk of double submission posed by the 17 lamps in the CODC 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: 07-Apr-16</p> <p>To: 29-Jun-23</p>	<p>Inaccurate database information leading to annual under submission of 4,946 kWh per annum.</p> <p>15 lights were recorded against the incorrect ICP.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: None</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 there are no robust processes in place to ensure data is correct.</p> <p>The impact is assessed to be low, based on the kWh differences described in section 3.1.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Discrepancies and updated lamp information identified in this audit will be used to update our records within the SLIM system. We will then conduct revisions of previous reconciliations 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>	04/08/2023	Identified
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<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	