

Compliance plan for Hastings District Council GENE, DUML 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Aug-22</p> <p>To: 03-Jul-23</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated under submission of 85,600 kWh per annum.</p> <p>36 items of load with no wattage recorded resulting in an under submission of 2,998 kWh per annum based on the most common lamp wattage of 19.5W.</p> <p>12 items of load with the incorrect ballast applied resulting in a very minor under submission of 64.9kWh per annum.</p> <p>57 items of load with no ICP associated resulting in an estimated under submission of 6,750 kWh additional lights identified in the field count.</p> <p>Inaccurate on and off times as the logger times will vary slightly from the CMS on and off times.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate overall but there is room for improvement.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will work with HDC to improve database accuracy by reviewing the database extract to identify the exceptions and discrepancies.	1/2/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Scripting for exceptions reports with HDC will be reviewed to better identify these issues and resolve them. This exceptions report will be run routinely to identify and resolve these issues on a continuous basis.	1/11/2023	

ICP identifier		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 01-Aug-22</p> <p>To: 03-Jul-23</p>	<p>57 items of load with no ICP associated resulting in an estimated under submission of 6,750 kWh additional lights identified in the field count.</p> <p>Potential impact: Low</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 rated as moderate overall but there is room for improvement.</p> <p>The impact is assessed to be low based on the estimated missing submission volume.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will work with HDC to identify and resolve these inaccuracies by removing the Waka Kotahi lights if appropriate, loading wattage and ensuring proper ICP recordings.	1/12/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Scripting for exceptions reports with HDC will be reviewed to better identify these issues and resolve them. This exceptions report will be run routinely to identify and resolve these issues on a continuous basis	1/11/2023	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-Aug-22 To: 03-Jul-23	36 items of load with no wattage recorded resulting in an estimated under submission of 2,998 kWh per annum based on the most common lamp wattage of 19.5W. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate overall but there is room for improvement. The impact is assessed to be low based on the estimated missing submission volume.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will work with HDC to identify and resolve these inaccuracies by loading correct wattage against these items of load.	1/12/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Scripting for exceptions reports with HDC will be reviewed to better identify these issues and resolve them. This exceptions report will be run routinely to identify and resolve these issues on a continuous basis	1/11/2023	

All load recorded in the database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Aug-22 To: 03-Jul-23	Four additional lights identified in the field count. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate as processes in place to update the database are generally robust. The impact is assessed to be low based on small number of additional lights found in the field.	
Actions taken to resolve the issue	Completion date	Remedial action status
HDC will investigate these asset locations to ensure they are properly recorded in the database if found to be belonging to HDC.	1/12/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will rely on HDC to accurately maintain its database, with the strengthening of processes with it's field workers / contractors.	1/12/2023	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-May-21</p> <p>To: 31-Jul-22</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated under submission of 85,600 kWh per annum.</p> <p>36 items of load with no wattage recorded resulting in an under submission of 2,998 kWh per annum based on the most common lamp wattage of 19.5W.</p> <p>12 items of load with the incorrect ballast applied resulting in a very minor under submission of 64.9kWh per annum.</p> <p>57 items of load with no ICP associated resulting in an estimated under submission of 6,750 kWh additional lights identified in the field count.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as moderate overall but there is room for improvement.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will work with HDC to improve database accuracy by reviewing the database extract to identify the exceptions and discrepancies.		1/2/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Scripting for exceptions reports with HDC will be reviewed to better identify these issues and resolve them. This exceptions report will be run routinely to identify and resolve these issues on a continuous basis		1/11/2023	

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-Aug-22</p> <p>To: 03-Jul-23</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated under submission of 85,600 kWh per annum.</p> <p>36 items of load with no wattage recorded resulting in an under submission of 2,998 kWh per annum based on the most common lamp wattage of 19.5W.</p> <p>12 items of load with the incorrect ballast applied resulting in a very minor under submission of 64.9kWh per annum.</p> <p>57 items of load with no ICP associated resulting in an estimated under submission of 6,750 kWh additional lights identified in the field count.</p> <p>Inaccurate on and off times as the logger times will vary slightly from the CMS on and off times.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as moderate overall but there is room for improvement.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will work with HDC to improve database accuracy by reviewing the database extract to identify the exceptions and discrepancies.	1/2/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Scripting for exceptions reports with HDC will be reviewed to better identify these issues and resolve them. This exceptions report will be run routinely to identify and resolve these issues on a continuous basis	1/11/2023	