

Compliance plan for Upper Hutt CC DUML Audit – 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Apr-23 To: 27-Jul-23</p>	<p>The best available estimate is not precise enough to conclude that the database is accurate within $\pm 5.0\%$ which could result in under submission of 11,000 kWh p.a.</p> <p>The April 2023 submission was estimated based on the March 2023 database extract because the April 2023 extract excluded gear wattages.</p> <p>Three items of load (luminaire_ids 12850, 12851 and 12852) with blank ICP numbers were confirmed not to be present in the field but have a gear wattage recorded which could result in over submission of 179.4 kWh p.a.</p> <p>84 of the 4,242 items of load did not have a valid zero (for LED) or non-zero gear wattage. The incorrect data resulted in potential over submission of 666.3 kWh p.a. and all errors resulting in a wattage difference have been corrected.</p> <p>20 lamps with inconsistent model and wattage information were checked and updated during the audit, and the incorrect data resulted in potential under submission of 4,313.7 kWh p.a.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium Actual impact: Medium</p> <p>Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as moderate as they will mitigate risk most of the time, and there are workarounds in place to resolve the AMDS upgrade issues relating to gear wattages. The audit risk rating is medium based on kWh variances, and most errors resulting in a potential wattage difference have already been corrected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
A data migration took place to transfer the database to the new system, this resulted in several data inaccuracies which have been resolved during the audit period.	1/9/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Upper Hutt CC currently conduct a monthly review when carrying out the data extract before submission to Genesis. This will continue in the new database.	1/10/23	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 31-May-23</p> <p>To: 31-May-23</p>	<p>81 of the 4,242 items of load with a DUML ICP number had a blank or invalid zero gear wattage. 78 are recorded as LED lamps and expected to have a zero year wattage, and UHCC intends to correct the gear wattages to zero. The other three lights were checked, and their lamp models, lamp wattages and gear wattages were corrected during the audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact is low, with estimated over submission of 435.6 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
A data migration took place to transfer the database to the new system, this resulted in several data inaccuracies which have been resolved during the audit period.	1/9/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Upper Hutt CC currently conduct a monthly review when carrying out the data extract before submission to Genesis. This will continue in the new database.	1/10/23	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 31-May-23 To: 27-Jul-23	Four additional lights found in the field. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as moderate as they will mitigate risk most of the time. The impact is assessed to be low as there were four additional lamps found in the sample checked, leading to potential under submission of 217 W or 927 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
These asset inaccuracies have been investigated and resolved in the database.	1/9/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Upper Hutt CC will investigate the viability of carrying out in-field audits on a routines basis to identify their own inaccuracies, looking at key areas where the database has not been edited recently.	1/12/23	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 31-May-23</p> <p>To: 27-Jul-23</p>	<p>The best available estimate is not precise enough to conclude that the database is accurate within $\pm 5.0\%$ which could result in under submission of 11,000 kWh p.a.</p> <p>Three items of load (luminaire_ids 12850, 12851 and 12852) with blank ICP numbers were confirmed not to be present in the field but have a gear wattage recorded which could result in over submission of 179.4 kWh p.a.</p> <p>84 of the 4,242 items of load did not have a valid zero (for LED) or non-zero gear wattage. The incorrect data resulted in potential over submission of 666.3 kWh p.a. and all errors resulting in a wattage difference have been corrected.</p> <p>20 lamps with inconsistent model and wattage information were checked and updated during the audit, and the incorrect data resulted in potential under submission of 1,010 W or 4,313.7 kWh p.a.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</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 as they will mitigate risk most of the time, and there are workarounds in place to resolve the AMDS upgrade issues relating to gear wattages. The audit risk rating is medium based on kWh variances, and most errors resulting in a potential wattage difference have already been corrected.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A data migration took place to transfer the database to the new system, this resulted in several data inaccuracies which have been resolved during the audit period.</p>		1/9/23	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Upper Hutt CC currently conduct a monthly review when carrying out the data extract before submission to Genesis. This will continue in the new database.</p>		1/10/23	

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-Apr-23</p> <p>To: 27-Jul-23</p>	<p>The best available estimate is not precise enough to conclude that the database is accurate within $\pm 5.0\%$ which could result in under submission of 11,000 kWh p.a.</p> <p>The April 2023 submission was estimated based on the March 2023 database extract because the April 2023 extract excluded gear wattages.</p> <p>Three items of load (luminaire_ids 12850, 12851 and 12852) with blank ICP numbers were confirmed not to be present in the field but have a gear wattage recorded which could result in over submission of 179.4 kWh p.a.</p> <p>84 of the 4,242 items of load did not have a valid zero (for LED) or non-zero gear wattage. The incorrect data resulted in potential over submission of 666.3 kWh p.a. and all errors resulting in a wattage difference have been corrected.</p> <p>20 lamps with inconsistent model and wattage information were checked and updated during the audit, and the incorrect data resulted in potential under submission of 4,313.7 kWh p.a.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</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 as they will mitigate risk most of the time, and there are workarounds in place to resolve the AMDS upgrade issues relating to gear wattages. The audit risk rating is medium based on kWh variances, and most errors resulting in a potential wattage difference have already been corrected.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
A data migration took place to transfer the database to the new system, this resulted in several data inaccuracies which have been resolved during the audit period.	1/9/23	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
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