Compliance Plan Marlborough DUML Oct 2023

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	Mercury applies the HHR profile for submission of the DUML load.		
With: Clause 11(1) of Schedule 15.3	One lamp had a missing circuit wattage, and five lamps had incorrect circuit wattages.		
	Potential impact: Low		
From: 08-Jun-23	Actual impact: Low		
To: 31-Jul-23	Audit history: Multiple times		
	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate, because data is entered manually into the database and a small number of errors were identified and the Authority, Mercury and approved auditors had not identified that exemption 233 had expired and that corrective action was required.		
	The impact is low because the error could result in over submission of 131 W or 560 kWh pa. The use of an unapproved profile is not expected to have an impact on submission volumes or the accuracy of allocation results.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will advise Marlborough DC of the required fixes.		August 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Marlborough DC are aware of the importance of maintaining an accurate database.		Ongoing	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3	One 13W LED light (SL11649) has no circuit wattage recorded. Potential impact: Low Actual impact: Low		
From: 08-Jun-23 To: 08-Jun-23	Audit history: None Controls: Strong Breach risk rating: 1		

Audit risk rating	Rationale for audit risk rating		
Low	Controls are strong because only one circuit wattage was missing. The impact is low, because the omission could result in under submission of 55.5 kWh per annum.		
Actions taken to resolve the issue		Completion date	Remedial action status
We will advise Marlborough DC of the required fixes.		August 2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Marlborough DC are aware of the importance of maintaining an accurate database.		Ongoing	

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and	One lamp had a missing circuit wattage, and five lamps had incorrect circuit wattages.			
15.37B(b)	Five lamps had incorrect nominal wattages.			
	Three poles had an incorrect number of lamps.			
Four lamps had a missing fitting type.				
	Two lamps had an incorrect fitting type. Potential impact: Low			
From: 08-Jun-23	Actual impact: Low			
To: 31-Jul-23	Audit history: None			
	Controls: Moderate Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as moderate, because data is entered manually into the database and a small number of errors were identified. The impact is low because the missing and incorrect circuit wattages could result in over submission of 131 W or 560 kWh pa. The incorrect or missing nominal wattages, numbers of lamps and fitting types have no impact on submission.			
Actions taken to resolve the issue		Completion date	Remedial action status	
We will advise Marlborough DC of the required fixes.		August 2023	Identified	

Preventative actions taken to ensure no further issues will occur	Completion date
Marlborough DC are aware of the importance of maintaining an accurate database.	Ongoing

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2	Mercury applies the HHR profile for submission of the DUML load.		
Clause 15.2 and 15.37B(c)	One lamp had a missing circuit wattage, and five lamps had incorrect circuit wattages.		
	Potential impact: Low		
From: 08-Jun-23	Actual impact: Low		
To: 31-Jul-23	Audit history: Multiple times		
	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate, because data is entered manually into the database and a small number of errors were identified and the Authority, Mercury and approved auditors had not identified that exemption 233 had expired and that corrective action was required. The impact is low because the error could result in over submission of 131 W or 560 kWh pa. The use of an unapproved profile is not expected to have an impact on submission volumes or the accuracy of allocation results.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are in discussions with the Electricity Authority regarding the HHR issue.		Ongoing	Investigating
We will advise Marlborough DC of the required fixes.		August 2023	
Preventative actions taken to ensure no further issues will occur		Completion date	
Marlborough DC are aware of the importance of maintaining an accurate database.		Ongoing	