

Compliance Plan for NZTA Northland DUML 2023

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 17.295F of part 17 From: 01-Jun-23 To: 28-Sep-23	Audit not completed within the required timeframe. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong, as Genesis are reliant on the database provider to supply the data and in this case the delay caused this report to be late. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue		Completion date
Significant improvement has been made in the database over the past 18 months. For this audit to worthwhile Genesis and the client have delayed ensuring the database was worth auditing.		21/9/2023
Preventative actions taken to ensure no further issues will occur		Completion date
The database is now with one retailer, Genesis. Future audits will be completed by the due date providing that a sufficient audit period is granted.		21/9/2023
Remedial action status		
Cleared		

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 31-Jul-23</p>	<p>The field audit found that the database is not confirmed as accurate within +/- 5%. In absolute terms, total annual consumption is estimated to be 60,400 kWh lower than the DUML database indicates.</p> <p>Nine items of load have the incorrect wattage applied in the DUML database which would result in over submission of 247.72kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak as the database has a high level of inaccuracy.</p> <p>The impact is assessed to be high due to the kWh volumes.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Significant improvement has been made in the accuracy of the database. 6 databases maintained by different parties have been consolidated for this database to exist. With the previous state of this data there was significant negligence by all contracted parties, partially due to confusion of data ownership. The customer has focused on quantity and location of load to clean this data, wattage has not been the point of concern. Both distributors have accepted this database accuracy and the approach by the customer.</p>	21/9/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All non-compliances found in the field audit have been resolved. Contractor forms have been provided for any light changes in the field, to protect the integrity of the database for future changes.</p>	21/09/2023	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 17-Jun-23	16 additional lights were found in the field. Potential impact: High Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as the database has not been updated to reflect changes made in the field. The impact is assessed to be low due to the kWh volumes.	
Actions taken to resolve the issue	Completion date	Remedial action status
All non-compliances identified in the field audit have been resolved by updating the database.	21/09/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
With the implementation of the contractor forms, this will ensure that any changes made in the field will be captured in the database. This will correct previous inaccuracies when changes are made in the field.	21/09/2023	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: unknown</p> <p>To: 17-Jun-23</p>	<p>The field audit found that the database is not confirmed as accurate within +/- 5%. In absolute terms, total annual consumption is estimated to be 60,400 kWh lower than the DUML database indicates.</p> <p>Nine items of load have the incorrect wattage applied in the DUML database which would result in over submission of 247.72kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak as the database has a high level of inaccuracy.</p> <p>The impact is assessed to be high due to the kWh volumes.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Significant improvement has been made in the accuracy of the database. 6 databases maintained by different parties have been consolidated for this database to exist. With the previous state of this data there was significant negligence by all contracted parties, partially due to confusion of data ownership. The customer has focused on quantity and location of load to clean this data, wattage has not been the point of concern. Both distributors have accepted this database accuracy and the approach by the customer.</p>	21/9/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All non-compliances found in the field audit have been resolved. Contractor forms have been provided for any light changes in the field, to protect the integrity of the database for future changes.</p>	21/09/2023	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: unknown</p> <p>To: 31-Jul-23</p>	<p>The field audit found that the database is not confirmed as accurate within +/- 5%. In absolute terms, total annual consumption is estimated to be 60,400 kWh lower than the DUML database indicates.</p> <p>Nine items of load have the incorrect wattage applied in the DUML database which would result in over submission of 247.72kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak as the database has a high level of inaccuracy.</p> <p>The impact is assessed to be high due to the kWh volumes.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Significant improvement has been made in the accuracy of the database. 6 databases maintained by different parties have been consolidated for this database to exist. With the previous state of this data there was significant negligence by all contracted parties, partially due to confusion of data ownership. The customer has focused on quantity and location of load to clean this data, wattage has not been the point of concern. Both distributors have accepted this database accuracy and the approach by the customer.</p>	21/9/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>All non-compliances found in the field audit have been resolved. Contractor forms have been provided for any light changes in the field, to protect the integrity of the database for future changes.</p>	21/09/2023	