

Compliance plan for Whakatane DC GENE DUML 2023,

| Deriving submission information | | |
|--|---|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 08-Oct-21 To: 30-Jun-23</p> | <p>ICP 1000023061BPCA7 has no unmetered load associated but has not been decommissioned resulting in an estimated over submission of 9,248 kWh occurring since September 2020 to date.</p> <p>11 items of load submitted on both ICP 1000023042BPD32 and 1000023060BPOE2 resulting in an estimated over submission of 7,850 kWh since February 2020 to date.</p> <p>Incorrect NST profile applied to ICPs 1000023047BP07D and 1000023042BPD32. Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Variance found between the kWh figure submitted by Genesis and the RAMM database extract, resulting in an estimated annual under submission 134,438 kWh per annum.</p> <p>No database reporting is being provided and therefore changes made in the database are not reflected in submissions.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times previously Controls: Weak Breach risk rating: 9</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| High | <p>The controls are rated as weak as the submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the submission variances.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| 1000023061BPCA7 has been decommissioned by Genesis, corrections will be made within the submission period to correct this. NST profiles have been corrected in the registry. | 1/10/2023 | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Genesis will work with WDC to implement a database submission process until Telensa can be used for monthly reporting and submissions. | 1/11/2023 | |

| Location of each item of load | | |
|--|--|------------------------|
| Non-compliance | Description | |
| Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 08-Oct-21 To: 30-Jun-23 | Two items of load not readily locatable. Potential impact: Low Actual impact: None Audit history: Once previously Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as strong as the processes in place will mitigate risk to an acceptable level. The impact is assessed to be none but low is the only option available to assign. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| 6618 and 4424 location details will be uploaded after these are further investigated in the field. | 1/10/2023 | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Whakatane DC believe their controls are strong regarding location details | NULL | |

| All load recorded in the database | | |
|--|---|------------------------|
| Non-compliance | Description | |
| Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Sep-22 To: 30-Jun-23 | Four additional items of load were found. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1 | |
| Audit risk rating | Rationale for audit risk rating | |
| Low | The controls are rated as strong as the processes in place will mitigate risk to an acceptable level. The impact is assessed to be low as the database was confirmed to be within the allowable +/-5% threshold. | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| 2/5 lights were added to the database that were found in the field; the remainder are still to be investigated. 2/3 wattages have been corrected, with one still to be investigated. | 1/11/2023 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Whakatane DC believe their controls are strong regarding this non-compliance. | NULL | |

| Database accuracy | | |
|--|--|------------------------|
| Non-compliance | Description | |
| <p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 08-Oct-21</p> <p>To: 30-Jun-23</p> | <p>Two items of load not readily locatable.</p> <p>Four items of load with insufficient light description of "LED" and actual wattages are unknown. This will be resulting in a very minor amount of incorrect submission.</p> <p>New connections are recorded from the time of vesting, not from the time of livening.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The audit risk rating is assessed to be low due to the error in kWh.</p> | |
| Actions taken to resolve the issue | Completion date | Remedial action status |
| <p>The four items of load with insufficient light description have been updated.</p> <p>Two items with insufficient location details are being investigated.</p> | 1/10/2023 | Investigating |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Genesis will work with WDC and Horizon to ensure livening dates are provided to WDC in a timely manner. | 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: 08-Oct-21</p> <p>To: 30-Sep-22</p> | <p>ICP 1000023061BPCA7 has no unmetered load associated but has not been decommissioned resulting in an estimated over submission of 9,248 kWh occurring since September 2020 to date.</p> <p>11 items of load submitted on both ICP 1000023042BPD32 and 1000023060BPOE2 resulting in an estimated over submission of 7,850 kWh since February 2020 to date.</p> <p>Incorrect NST profile applied to ICPs 1000023047BP07D and 1000023042BPD32.</p> <p>Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Variance found between the kWh figure submitted by Genesis and the RAMM database extract, resulting in an estimated annual under submission 134,438 kWh per annum.</p> <p>No database reporting is being provided and therefore changes made in the database are not reflected in submissions.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p> | |
| Audit risk rating | Rationale for audit risk rating | |
| High | <p>The controls are rated as weak as the submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the submission variances.</p> | |
| Actions taken to resolve the issue | | Completion date |
| 1000023061BPCA7 has been decommissioned by Genesis, corrections will be made within the submission period to correct this. NST profiles have been corrected in the registry. | | 1/10/2023 |
| Preventative actions taken to ensure no further issues will occur | | Completion date |
| Genesis will work with WDC to implement a database submission process until Telensa can be used for monthly reporting and submissions. | | 1/11/2023 |
| Investigating | | |