Compliance plan for Hutt CC DUML – September 2023

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1 With: Clause 11(1) of	LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.			
Schedule 15.3	398 of the 14,126 poles in the database did not have any light model information populated in any of the six fields resulting in potential under submission of 47,596 kWh p.a.			
	Light models for 576 items of load were missing from the wattage table which is used to populate the wattages in the aggregated database extract resulting in potential under submission of 54,732 kWh p.a.			
	Missing or unexpected zero gear wattages were recorded on the table of wattages for 161 items of load resulting in potential under submission of 8,020.9 kWh p.a.			
	Unexpected non-zero gear wattages were recorded on the table of wattages for 341 items of load resulting in potential over submission of 19,877.2 kWh p.a.			
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.			
	Potential impact: High			
	Actual impact: High			
	Audit history: Multiple times			
From: 01-Nov-22	Controls: Weak			
To: 31-Jul-23	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as weak overall, due to the issues with the accuracy of the summarised database extract, missing light information, and missing wattages for some light models. The audit risk rating is high based on kWh variances identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
The GIS database is being cleaned for migration to RAMM, discrepancies and exceptions are to be investigated where possible. This will be through field investigations and use of the database to cross reference and match up data.		1/12/2023	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
With the migration to RAMM, reporting on the database will be improved to identify, manage and clear inconsistencies and exceptions on a routine bases.		1/12/2023		

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3	398 of the 14,126 poles in the database did not have any light model information populated in any of the six fields resulting in potential under submission of 47,596 kWh p.a. Light models for 576 items of load were missing from the wattage table which is used		
	to populate the wattages in the summary database extract resulting in potential under submission of 54,732 kWh p.a.		
	Missing or unexpected zero gear wattages were recorded on the table of wattages for 161 items of load resulting in potential under submission of 8,020.9 kWh p.a.		
	Potential impact: Unknown		
	Actual impact: Medium		
	Audit history: Multiple times		
From: 30-May-23	Controls: Weak		
To: 30-May-23	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak overall, due to the issues with the accuracy of the summarised database extract (which adds the wattages), missing light information, and missing wattages for some light models. The audit risk rating is high based on kWh variances identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
The GIS database is being cleaned for migration to RAMM, discrepancies and exceptions are to be investigated where possible. This will be through field investigations and use of the database to cross reference and match up data.		1/12/2023	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
With the migration to RAMM, reporting on the database will be improved to identify, manage and clear inconsistencies and exceptions on a routine bases.		1/12/2023	

All load recorded in database				
Non-compliance	Description			
Audit Ref: 2.5	Two additional lights found in the field.			
With: Clause 11(2)(c) and	Potential impact: Low			
(d) of Schedule 15.3	Actual impact: Low			
	Audit history: Twice			
From: 30-May-23	Controls: Weak			
To: 25-Jul-23	Breach risk rating: 3			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as weak as process to track changes is not capturing all changes made in the field. The impact is assessed to be low as there were only two additional lamps found in the sample checked, leading to potential under submission of 30 W or 256 kWh per annum.			
Actions take	en to resolve the issue	Completion date	Remedial action status	
Site investigations will take place at the locations listed above to ensure information is correct and then capture these in the database to improve accuracy.		1/10/2023	Identified	
Preventative actions tak	cen to ensure no further issues will occur	Completion date		
Move to RAMM is to take place once database cleanse is complete, changes in the database are being logged to ensure no data is lost. Once moved to RAMM field workers will have access to pocket RAMM to improve the flow of information from the field.		1/12/2023		

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and	LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.			
15.37B(b)	398 of the 14,126 poles in the database did not have any light model information populated in any of the six fields resulting in potential under submission of 47,596 kWh p.a.			
	Light models for 576 items of load were missing from the wattage table which is used to populate the wattages in the summary database extract resulting in potential under submission of 54,732 kWh p.a.			
	Missing or unexpected zero gear wattages were recorded on the table of wattages for 161 items of load resulting in potential under submission of 8,020.9 kWh p.a.			
	Unexpected non-zero gear wattages were recorded on the table of wattages for 341 items of load resulting in potential over submission of 19,877.2 kWh p.a.			
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.			
	Potential impact: High			
	Actual impact: High			
	Audit history: Multiple times			
From: 30-May-23	Controls: Weak			
To: 25-Jul-23	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as weak overall, due to the issues with the accuracy of the summarised database extract, missing light information, and missing wattages for some light models. The audit risk rating is high based on kWh variances identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
The GIS database is being cleaned for migration to RAMM, discrepancies and exceptions are to be investigated where possible. This will be through field investigations and use of the database to cross reference and match up data.		1/12/2023	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
With the migration to RAMM, reporting on the database will be improved to identify, manage and clear inconsistencies and exceptions on a routine bases.		1/12/2023		

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2 With: Clause 15.2 and	LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.			
15.37B(c)	398 of the 14,126 poles in the database did not have any light model information populated in any of the six fields resulting in potential under submission of 47,596 kWh p.a.			
	Light models for 576 items of load were missing from the wattage table which is used to populate the wattages in the aggregated database extract resulting in potential under submission of 54,732 kWh p.a.			
	Missing or unexpected zero gear wattages were recorded on the table of wattages for 161 items of load resulting in potential under submission of 8,020.9 kWh p.a.			
	Unexpected non-zero gear wattages were recorded on the table of wattages for 341 items of load resulting in potential over submission of 19,877.2 kWh p.a.			
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.			
	Potential impact: High			
	Actual impact: High			
From: 01-Nov-22	Audit history: Multiple times			
To: 31-Jul-23	Controls: Weak Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as weak overall, due to the issues with the accuracy of the summarised database extract, missing light information, and missing wattages for some light models. The audit risk rating is high based on kWh variances identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
The GIS database is being cleaned for migration to RAMM, discrepancies and exceptions are to be investigated where possible. This will be through field investigations and use of the database to cross reference and match up data.		1/12/2023	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
With the migration to RAMM, reporting on the database will be improved to identify, manage and clear inconsistencies and exceptions on a routine bases.		1/12/2023		