Compliance Plan Kaikoura District Council DUML 2023

Deriving submission information					
Non-compliance	Description				
Audit Ref: 2.1	Submissions are made using HHR profile.				
With: Clause 11(1) of Schedule 15.3	Submission is based on database wattage and does not account for the new 25% dimming profile, resulting in an approximate over submission of 12,359.21 kWh per annum. Mercury is following a compliant process because they do not have an approved profile which allows them to use the dimmed data for submission.				
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.				
	Potential impact: Medium				
	Actual impact: Medium				
	Audit history: Multiple times				
From: 01-Jul-23	Controls: Weak				
To: 31-Jul-23	Breach risk rating: 6				
Audit risk rating	Rationale for audit risk rating				
Medium	The controls are rated as weak because dimming is not accounted for.				
	The impact is assessed to be medium due to the impact of over submission.				
Actions taken to resolve the issue		Completion date	Remedial action status		
We are in the process of drafting our profile application which once approved will allow us to be compliant in submitting half hourly data for DUML. As agreed with the EA we will implement the new profile once we move to a new platform which is currently planned for 2024		2024	Identified		
Preventative actions taken to ensure no further issues will occur		Completion date			
As above		As above			

ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2	No items of load have the ICP recorded against them in the database.		
With: (Clause 11(2)(a) and (aa) of Schedule 15.3)	Potential impact: Low		
	Actual impact: Low		
	Audit history: Once		
From: 15-Apr-21	Controls: Weak		
To: 02-Oct-23	Breach risk rating: 3		

Low	The controls are rated as weak because the ICP is not recorded in the database. The impact is assessed to be low. There is only one ICP, so there is no impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
KDC investigating with a view to adding the field, we will follow up.		December 2023	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
As above		As above	

Rationale for audit risk rating

Audit risk rating

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2	Submissions are made using HHR profile.		
With: Clause 15.2 and 15.37B(c)	Submission is based on database wattage and does not account for the new 25% dimming profile, resulting in an approximate over submission of 12,359.21 kWh per annum. Mercury is following a compliant process because they do not have an approved profile which allows them to use the dimmed data for submission.		
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Weak		
From: 01-Jul-23	Breach risk rating: 6		
To: 31-Jul-23			
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak because dimming is not accounted for. The impact is assessed to be medium due to the impact of over submission.		

Actions taken to resolve the issue	Completion date	Remedial action status
We are in the process of drafting our profile application which once approved will allow us to be compliant in submitting half hourly data for DUML. As agreed with the EA we will implement the new profile once we move to a new platform which is currently planned for 2024	2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above	As above	