

## Compliance plan for CCC Orion area DUML December 2023

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Nov-22 To: 23-Nov-23</p>	<p>In absolute terms, total annual consumption is estimated to be 637,200 kWh lower than the DUML database indicates.</p> <p>Estimated over submission of 443,543 kWh per annum based on dimming of 31,000 lamps.</p> <p>Over submission of approx. 149,000 kWh per annum due to incorrect monthly reporting.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times previously</p> <p>Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls are rated as weak because they do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be high, based on the kWh differences described above, which result in over submission of approx. 1.2GWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Dimming project still ongoing, CCC will continue to work on this and keep us updated	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 01-Jan-23 To: 21-Nov-23	26,087 items of load have insufficient descriptions. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. The impact on settlement and participants is minor; therefore the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
CCC looking to add standardized descriptions to remove this non-compliance	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 01-Nov-22 To: 23-Nov-23	One additional item of load identified in the field audit. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong because they mitigate risk to an acceptable level. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
CCC will update their database accordingly	01/02/2023	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Nov-22</p> <p>To: 23-Nov-23</p>	<p>In absolute terms, total annual consumption is estimated to be 696,100 kWh lower than the DUMML database indicates.</p> <p>At least 32 items of load with incorrect coordinates.</p> <p>13,000 kWh over submission outside the 14-month revision window due to a delay in updating the database following LED upgrades on Rose St.</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 because they do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Dimming project still ongoing, CCC will continue to work on this and keep us updated	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Nov-22 To: 23-Nov-23</p>	<p>In absolute terms, total annual consumption is estimated to be 637,200 kWh lower than the DUMML database indicates.</p> <p>Estimated over submission of 443,543 kWh per annum based on dimming of 31,000 lamps.</p> <p>Over submission of approx. 149,000 kWh per annum due to incorrect monthly reporting.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times previously</p> <p>Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls are rated as weak because they do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be high, based on the kWh differences described above, which result in over submission of approx. 1.2GWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
CCC working on changing their reporting so unmetered load such as tsunami warning sirens and bus stop lights not included	01/03/2023	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	