

## Compliance plan for Nulite DUML 2023

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26  From: 01-Jun-23 To: 04-Dec-23	Audit not completed within the timeframe specified by the Electricity Authority. 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 rated as strong, as the delay was outside of the control of Genesis. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: Unknown To: 31-Oct-23</p>	<p>Incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments. The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are recorded as weak as changes in load are not being reported to Genesis and neither the database nor submission information reflect the true load installed in the field.</p> <p>The impact is assessed to be medium due to the impact on submission.</p>	
Actions taken to resolve the issue		Completion date
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024
Remedial action status		
Investigating		

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 03-Feb-20 To: 31-Oct-23	One item of load with insufficient details to locate it. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as moderate as this issue was first identified in 2020 but has not been rectified. The impact is assessed to be low as only one item of load is affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4 With: 11(2)(c) of Schedule 15.3</p> <p>From: 01-Jun-17 To: 31-Oct-23</p>	<p>There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.</p> <p>Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls in place are rated as moderate as ballast information has not been provided.</p> <p>The impact is assessed to be low as the volume of lights associated with this database are small.</p>	
Actions taken to resolve the issue		Completion date
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.		01/02/2024
Remedial action status		
Investigating		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: 11(2A) of Schedule 15.3 From: 01-Jun-17 To: 31-Oct-23	Two additional lights found in the field. Potential impact: Medium Actual impact: Low Audit history: Multiple times Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls in place are rated as moderate as there is room for improvement in the management of the database. The impact is assessed to be low, based on the kWh differences.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: 15.2 and 15.37B(b)  From: Unknown To: 31-Oct-23	<p>The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p> <p>There is insufficient information recorded to determine the capacity of the items of load as the ballast wattages are not recorded in the database.</p> <p>Potential impact: Medium            Actual impact: Medium            Audit history: Multiple times            Controls: Weak            Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls in place are rated as weak as there have been no updates to the database since 1 April 2022.</p> <p>The impact is assessed to be medium, based on the kWh differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis are working to establish good processes with our customer as the responsibility of database management sits with them. This is an ongoing process and establishing key contact persons and database management processes are the first point of action on this agenda.	01/02/2024	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2 With: Clauses 15.2 and 15.37B(c)</p> <p>From: Unknown To: 31-Oct-23</p>	<p>Incorrect submission calculations will be resulting in an estimated annual over submission of 23,146.68 kWh per annum.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments. The field audit found the database was inaccurate resulting in an estimated over submission of 11,002.05 kWh if the database was used for submission.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: None Controls: Weak Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are recorded as weak as changes in load are not being reported to Genesis and neither the database nor submission information reflect the true load installed in the field.</p> <p>The impact is assessed to be medium due to the impact on submission.</p>	
Actions taken to resolve the issue		Completion date
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Remedial action status		
Investigating		