Compliance plan for Otorohanga DC DUML October 2023

| Deriving submission information | | | | |
|--|---|------------------|------------------------|--|
| Non-compliance | Description | | | |
| Audit Ref: 2.1 With: Clause 11(1) of | The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 2,800 kWh. | | | |
| Schedule 15.3 | Ten NZTA lights being submitted by both ODC and NZTA resulting in 5,700 kWh of over submission. | | | |
| | Some decorative and festive lights are not recorded accurately in the database. | | | |
| | Submission is based on a snapshot and does not consider historic adjustments. | | | |
| | Potential impact: High | | | |
| | Actual impact: Low | | | |
| | Audit history: Multiple times previous | ly | | |
| From: 01-Nov-22 | Controls: Moderate | | | |
| To: 14-Oct-23 | Breach risk rating: 2 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | The controls are rated as moderate but there is room for improvement. | | | |
| | The impact is assessed to be low base | d on the kWh imp | pact to the market. | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | |
| The 10 NZTA lights identified have been updated in ODC system to show ownership as NZTA. | | 1/02/2024 | Identified | |
| Decorative lights are not currently in use and the lights are due to be changed out and wattage confirmed at this time. | | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | | |
| Genesis is working with ODC about implementing tracking of changes in the field moving forward to capture these changes. | | 1/02/2024 | | |

| All load recorded in database | | | | | |
|--|--|------------------|------------------------|--|--|
| Non-compliance | Description | | | | |
| Audit Ref: 2.5 | Some decorative and festive lights are not recorded in the database. | | | | |
| With: Clause 11(2A) of | Three private lights are not recorded in the database. | | | | |
| Schedule 15.3 | Potential impact: Low | | | | |
| | Actual impact: Low | | | | |
| | Audit history: Multiple times previously | | | | |
| From: unknown | Controls: Moderate | | | | |
| To: 14-Oct-23 | Breach risk rating: 2 | | | | |
| Audit risk rating | Rationale for audit risk rating | | | | |
| Low | The controls are rated as moderate overall as the controls in place mitigate risk most of the time but there is opportunity for improvement. | | | | |
| | The impact is assessed to be low, as the expected to be small. | ne kWh impact on | reconciliation is | | |
| Actions taken to resolve the issue | | Completion date | Remedial action status | | |
| Decorative lights are not currently in use and the lights are due to be changed out and wattage confirmed at this time. | | 01/02/2024 | Identified | | |
| The three private lights are under investigation | | | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | | | |
| Genesis is working with ODC about implementing tracking of changes in the field moving forward to capture these changes. | | 01/02/2024 | | | |

| Database accuracy | | | | |
|--|---|-----------------|------------------------|--|
| Non-compliance | Description | | | |
| Audit Ref: 3.1 With: Clause 15.2 and | The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 2,800 kWh. | | | |
| 15.37B(b) | Ten NZTA lights being submitted by both ODC and NZTA resulting in 5,700 kWh of over submission. | | | |
| | Some decorative and festive lights are not recorded accurately in the database. | | | |
| | Three private lights are not recorded in the database. | | | |
| | Potential impact: High | | | |
| | Actual impact: Low | | | |
| | Audit history: Multiple times previously | | | |
| From: 01-Nov-22 | Controls: Moderate | | | |
| To: 14-Oct-23 | Breach risk rating: 2 | | | |
| Audit risk rating | Rationale for audit risk rating | | | |
| Low | 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 | |
| Decorative lights are not currently in use and the lights are due to be changed out and wattage confirmed at this time. | | 01/02/2024 | Identified | |
| The three private lights are under investigation | | | | |
| Preventative actions taken to ensure no further issues will occur | | Completion date | | |
| Genesis is working with ODC about implementing tracking of changes in the field moving forward to capture these changes. | | 01/02/2024 | | |

| Volume information accuracy | | | |
|--|--|--|--|
| Non-compliance | Description | | |
| Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c) | The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 2,800 kWh. Ten NZTA lights being submitted by both ODC and NZTA resulting in 5,700 kWh | | |
| | of over submission. Some decorative and festive lights are not recorded accurately in the database. | | |
| | Submission is based on a snapshot and does not consider historic adjustments. Potential impact: High Actual impact: Low | | |
| From: 01-Nov-22 | Audit history: Multiple times previously Controls: Moderate | | |
| To: 14-Oct-23 | Breach risk rating: 2 | | |
| Audit risk rating | Rationale for audit risk rating | | |
| Low | The controls are rated as moderate but there is room for improvement. The impact is assessed to be low based on the kWh impact to the market. | | |

| Actions taken to resolve the issue | Completion date | Remedial action status |
|---|-----------------|------------------------|
| Decorative lights are not currently in use and the lights are due to be changed out and wattage confirmed at this time. The three private lights are under investigation | 01/02/2024 | Identified |
| Preventative actions taken to ensure no further issues will occur | Completion date | |
| Genesis is working with ODC about implementing tracking of changes in the field moving forward to capture these changes. | 01/02/2024 | |