## Compliance plan for Hamilton City Council Genesis, DUML 2024

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of	Exclusion of 112 items of load with the HCC DUML ICPs allocated is resulting in an estimated under submission of 36,500 kWh per annum.		
Schedule 15.3	In absolute terms, total annual consumption is estimated to be 186,700 kWh lower than the DUML database indicates.		
	Analysis of the gear wattage applied indicates an estimated under submission 1,429 kWh per annum.		
	Submission is based on a snapshot of the database at the end of the month and does not consider historic adjustments or the fact that lights can be livened before they are entered into the database.		
	Potential impact: High		
	Actual impact: High		
	Audit history: Multiple times		
From: 29-Jul-22	Controls: Moderate		
To: 30-Nov-23	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, as the maintenance process is robust but there is room for improvement for the adding of new streetlights and the production of the monthly wattage report.		
	The impact is assessed to be high due to the potential over submission indicate from the field audit findings.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to work with HCC to ensure accuracy of data. Genesis will endeavour to set up a tracking of change process with HCC.  Genesis will work with the Network company and HCC to ensure a robust new connection process is in place		01/08/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to work with HCC to ensure accuracy of data. Genesis will endeavour to set up a tracking of change process with HCC.		01/08/2024	
Genesis will work with the Network company and HCC to ensure a robust new connection process is in place			

Description and capacity of load				
Non-compliance	Description			
Audit Ref: 2.4	13,391 items of load with no gear wattage recorded.			
With: Clause 11(2)(d)	Potential impact: None			
of Schedule 15.3	Actual impact: None			
	Audit history: None			
From: 29-Jul-22	Controls: Strong			
To: 13-Nov-23	Breach risk rating: 1			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as strong overall as the lights with a gear wattage of more than zero are all populated correctly but there is room for improvement as recommended above.  The impact is assessed to be none as this has no impact on submission but low was selected as none is not available.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis will work with HCC to ensure accuracy of data and that the dataset records are updated accurately.		01/03/2024	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will work with HCC to ensure accuracy of data and that the dataset records are updated accurately.		01/03/2024		

All load recorded in the database				
Non-compliance	Description			
Audit Ref: 2.5	Eight items of load missing from the database.			
With: Clause 11(2A) of	Potential impact: Low			
Schedule 15.3	Actual impact: Low			
	Audit history: Multiple times previou	sly		
From: 29-Jul-22	Controls: Moderate			
To: 30-Nov-23	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as moderate, as the new connection process needs reviewing to ensure that all lights installed are captured correctly.  The impact is rated as low as the number of extra lights found in the field were minor in relation to the volume sampled.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis will work with the Network company and HCC to ensure a robust new connection process is in place		01/08/2024	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will work with the Network company and HCC to ensure a robust new connection process is in place		01/08/2024		

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Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and	In absolute terms, total annual consumption is estimated to be 186,700 kWh lower than the DUML database indicates.			
15.37B(b)	Analysis of the gear wattage applied indicates an estimated under submission of 1,429 kWh per annum.			
	Exclusion of 112 items of load with the HCC DUML ICPs allocated is resulting in an estimated under submission of 36,500 kWh per annum.			
	Potential impact: High			
	Actual impact: High			
	Audit history: Multiple times			
From: 29-Jul-22	Controls: Moderate			
To: 30-Nov-23	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
High	The controls are rated as moderate, as the maintenance process is robust but there is room for improvement for the adding of new streetlights.  The impact is assessed to be high due to the potential over submission indicated from the field audit findings.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis will continue to work with HCC to ensure accuracy of data. Genesis will endeavour to set up a tracking of change process with HCC.		01/08/2024	Investigating	
Genesis will work with the Network company and HCC to ensure a robust new connection process is in place				
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will continue to work with HCC to ensure accuracy of data. Genesis will endeavour to set up a tracking of change process with HCC.		01/08/2024		
Genesis will work with the Network company and HCC to ensure a robust new connection process is in place				

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and	Exclusion of 112 items of load with the HCC DUML ICPs allocated is resulting in an estimated under submission of 36,500 kWh per annum.		
15.37B(c)	In absolute terms, total annual consumption is estimated to be 186,700 kWh lower than the DUML database indicates.		
	Analysis of the gear wattage applied indicates an estimated under submission of 1,429 kWh per annum.		
	Submission is based on a snapshot of the database at the end of the month and does not consider historic adjustments or the fact that lights can be livened before they are entered into the database.  Potential impact: High		
	Actual impact: High		
From: 29-Jul-22	Audit history: Multiple times		
To: 30-Nov-23	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as moderate, as the maintenance process is robust but there is room for improvement for the adding of new streetlights and the production of the monthly wattage report.		
	The impact is assessed to be high due to the potential over submission indicated from the field audit findings.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will continue to work with HCC to ensure accuracy of data. Genesis will endeavour to set up a tracking of change process with HCC.		01/08/2024	Investigating
Genesis will work with the Network company and HCC to ensure a robust new connection process is in place			
Preventative actions taken to ensure no further issues will		Completion	
Genesis will continue to work with HCC to ensure accuracy of data. Genesis will endeavour to set up a tracking of change process with HCC.  Genesis will work with the Network company and HCC to ensure a robust new connection process is in place		01/08/2024	