

Compliance plan for Genesis NZTA Waikato DUML November 2023

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 03-Sep-23 To: 30-Nov-23	Audit not conducted within the required timeframe. Potential impact: Medium Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are recorded as strong because the delay in the audit was for appropriate reasons, which were to update the database as much as possible before the audit. The audited database was more accurate in November than it would have been in September, therefore there is no impact of the delay.	
Actions taken to resolve the issue	Completion date	Remedial action status
Decision was made to wait for more accurate data that was provided on 15/11/2023	15/11/2023	Cleared
Preventative actions taken to ensure no further issues will occur	Completion date	
Decision was made to wait for more accurate data that was provided on 15/11/2023	15/11/2023	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Dec-22</p> <p>To: 30-Nov-23</p>	<p>Submission is not occurring for ICP 1000613268PCC4A, therefore under submission has occurred by 12,000 kWh per month since March 2023.</p> <p>Data loggers used across more than one network resulting in the incorrect burn hours being applied.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 235,300 kWh per annum.</p> <p>One invalid light type.</p> <p>Four items of load with the incorrect ballast applied.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be high due to the estimated kWh impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The status for 1000613268PCC4A has been updated to Active to allow Genesis to submit on.</p> <p>Genesis has identified which ICP's have been impacted with incorrect loggers causing incorrect burn hours. Genesis is working with EMS and our customer to resubmit on the correct data.</p>	30/01/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The status for 1000613268PCC4A has been updated to Active to allow Genesis to submit on.</p> <p>Genesis has identified which ICP's have been impacted with incorrect loggers causing incorrect burn hours. Genesis is working with EMS and our customer to resubmit on the correct data.</p>	30/01/2024	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Dec-22</p> <p>To: 30-Nov-23</p>	<p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 235,300 kWh per annum.</p> <p>One invalid light type.</p> <p>Four items of load with the incorrect ballast applied.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be high due to the estimated kWh impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will continue to work with our customer to ensure information on light wattages are correctly managed, however, robust processes are in place and Genesis and our customer believe that correct wattages are recorded against these assets that were found to be non-compliant.	N/A	Disputed
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis will continue to work with our customer to ensure information on light wattages are correctly managed, however, robust processes are in place and Genesis and our customer believe that correct wattages are recorded against these assets that were found to be non-compliant.	N/A	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Dec-22</p> <p>To: 30-Nov-23</p>	<p>Submission is not occurring for ICP 1000613268PCC4A, therefore under submission has occurred by 12,000 kWh per month since March 2023.</p> <p>Data loggers used across more than one network resulting in the incorrect burn hours being applied.</p> <p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 235,300 kWh per annum.</p> <p>One invalid light type.</p> <p>Four items of load with the incorrect ballast applied.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is assessed to be high due to the estimated kWh impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The status for 1000613268PCC4A has been updated to Active to allow Genesis to submit on.</p> <p>Genesis has identified which ICP's have been impacted with incorrect loggers causing incorrect burn hours. Genesis is working with EMS and our customer to resubmit on the correct data.</p>	30/01/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>The status for 1000613268PCC4A has been updated to Active to allow Genesis to submit on.</p> <p>Genesis has identified which ICP's have been impacted with incorrect loggers causing incorrect burn hours. Genesis is working with EMS and our customer to resubmit on the correct data.</p>	30/01/2024	