## Compliance plan for Kawerau DC DUML GENE 2024

Deriving submission information				
Non-compliance	Description			
Audit Ref: 2.1 Clause 11(1) of	Under submission of 18,400 kWh per annum identified by the field audit.  On off times are based on a logger located in Taupo and not in Kawerau.			
Schedule 15.3	Some ballast wattage discrepancies leading to over submission of 11,131 kWh per annum.			
	Submission is based on a snapshot and does not consider historic adjustments.			
	Potential impact: High			
	Actual impact: Medium			
	Audit history: Multiple times			
From: 01-Jun-23	Controls: Weak			
To: 08-Feb-24	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
Medium	The previous audit recorded the controls as moderate, but I have recorded them as weak in this audit because the discrepancies from the previous audit have not been corrected and the recommendations were not adopted.			
	The impact is assessed to be medium, based on the kWh differences described above.			
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis will continue to work with KDC to ensure the discrepancies identified are corrected.		Continuous Improvement	Identified	
Genesis will continue to work with KDC to implement a tracking of change process				
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will continue to work with KDC to ensure the discrepancies identified are corrected.		Continuous Improvement		
Genesis will continue to tracking of change proce	work with KDC to implement a ss			

All load recorded in database					
Non-compliance	Description				
Audit Ref: 2.5	Eight additional lights in the field.				
With: Clause 11(2A) of	Potential impact: Low				
Schedule 15.3	Actual impact: Low				
	Audit history: Once				
From: 01-Jun-23 To: 08-Feb-24	Controls: Moderate				
	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		
Genesis will continue to work with KDC to ensure the discrepancies identified are corrected.		30/05/2024	Identified		
Preventative actions taken to ensure no further issues will occur		Completion date			
Genesis will continue to work with KDC to ensure the discrepancies identified are corrected.		30/05/2024			

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1	Festive lighting is connected but the volume is not recorded.			
With: Clause 15.2 and 15.37B(b)	Some ballast wattage discrepancies leading to over submission of 11,131 kWh per annum.			
	Under submission of 18,400 kWh per annum identified by the field audit.			
	Corrections not made after the previous audit.			
	Potential impact: High			
	Actual impact: Medium			
	Audit history: Multiple times			
From: 01-Sep-22	Controls: Weak			
To: 24-May-23	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
Medium	The previous audit recorded the controls as moderate, but I have recorded them as weak in this audit because the discrepancies from the previous audit have not been corrected and the recommendations were not adopted.			
	The impact is assessed to be medium, above.	based on the kW	h differences described	
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis will work closely with KDC to ensure the required changes are updated		Continuous Improvement	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Genesis will work closely with KDC to ensure the required changes are updated		Continuous Improvement		

Volume information accuracy					
Non-compliance	Description				
Audit Ref: 3.2	Under submission of 18,400 kWh per annum identified by the field audit.				
Clause 15.2 and	On off times are based on a logger located in Taupo and not in Kawerau.				
15.37B(c)	Some ballast wattage discrepancies leading to over submission of 11,131 kWh per annum.				
	Submission is based on a snapshot and does not consider historic adjustments.				
	Potential impact: High				
	Actual impact: Medium				
	Audit history: Multiple times				
From: 01-Jun-23	Controls: Weak				
To: 08-Feb-24	Breach risk rating: 6				
Audit risk rating	Rationale for audit risk rating				
Medium	The previous audit recorded the controls as moderate, but I have recorded them as weak in this audit because the discrepancies from the previous audit have not been corrected and the recommendations were not adopted.				
	The impact is assessed to be medium, based on the kWh differences described above.				
Actions taken to resolve the issue		Completion date	Remedial action status		
Genesis continues to investigate a logger for Kawerau which is underway however no completion date available.		Continuous Improvement	Identified		
Genesis will continue to work with KDC about accuracy of their database and implementing a tracking of change process					
Preventative actions taken to ensure no further issues will occur		Completion date			
Genesis currently uses the Taupo logger as it is closest available to Kawerau		Continuous Improvement			