

Compliance plan for Prime Wellington Billboards DUML – March 2024

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-Jan-24</p> <p>To: 30-Jan-24</p>	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as weak. Based on a field audit of all database records it appears that changes are not being consistently communicated to Prime, including where billboards change ownership, are upgraded to digital, or are removed.</p> <p>The impact is medium, based on the kWh differences described above. The NSP difference has no impact on submission as both NSPs are within the same balancing area.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.		TBC	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Ultimately, we as the retailer are responsible in maintaining the connection however, we are unable to fulfil our requirements when we are not notified of changes. We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.		In progress	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 30-Jun-19</p> <p>To: 30-Jan-24</p>	<p>The database does not include a description of each item of load, and the capacity of each item in watts.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: None</p> <p>Breach risk rating: 5</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>There are no controls because the required lamp description and wattage information is not recorded in the database.</p> <p>The impact is assessed to be low because the wattage can be derived from the kW per day and on hours, and an indication of the lamp type can be determined by calculating the wattage.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.	TBC	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We have added in these fields to our database and will update information accordingly.	23/02/2024	

All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 30-Jan-24</p> <p>To: 30-Jan-24</p>	<p>For billboard ID 00111101 at 85 Hutt Road no lights were recorded in the database but four 400W Metal Halide (400W lamp + 38W gear) were installed.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as weak. Based on a field audit of all database records it appears that changes are not being consistently communicated to Prime, including where billboards change ownership, are upgraded to digital, or are removed.</p> <p>The impact is low, as one billboard was found to have extra lights installed.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.	TBC	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.	In progress	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 30-Jun-19</p> <p>To: 30-Jan-24</p>	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The database does not include a description of each item of load, and the capacity of each item in watts.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as weak. Based on a field audit of all database records it appears that billboard light changes are not being consistently communicated to Prime.</p> <p>The impact is medium, based on the kWh differences described above. The NSP difference has no impact on submission as both NSPs are within the same balancing area, and the missing wattage and description information can largely be determined by calculating the wattage from the information which is available.</p>	
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Using the audit findings, we will be reviewing all billboards with our customer and will be making the necessary updates to ensure information is accurate going forward.	TBC	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Ultimately, we as the retailer are responsible in maintaining the connection however, we are unable to fulfil our requirements when we are not notified of changes. We will be implementing a better process which we hope will be reflected in the next audit and will be raising the audit findings with our customer.	In progress	

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-May-21</p> <p>To: 31-Mar-23</p>	<p>The database is not accurate within $\pm 5\%$ and there is potential under submission of 35,844.79 kWh per annum.</p> <p>The billboards located at Main Hutt Road Petone are currently assigned to ICP 0001259564UN4AC (NSP WIL0331) but other ICPs on Main Hutt Road Petone are allocated to NSP GD0331. The incorrect NSP may be being applied for submission.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
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