## Compliance plan for Manawatu DC DUML 2024

Deriving submission info	rmation
Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	The database extract provided for the audit in January 2024 was not consistent with the database extract provided for submission in January 2024. Some of the differences do not appear to relate to timing of light changes. The differences could result in over submission of 14,089.9 kWh per annum.
	Based on the field survey of 228 items of load on 6 February 2024, the best available estimate is not precise enough to conclude that the database is accurate within ±5% leading to potential over submission of 3,500 kWh per annum.
	Three lights at Waughs Road which were installed at a turning bay by MDC do not have lamp model, lamp wattage or gear wattage recorded. The light details are to be confirmed.
	Two lights at Leithbridge Street do not have lamp model, lamp wattage or gear wattage recorded. They are metered floodlights, and not required to be reported as part of the DUML load and should not be recorded against DUML ICP 0900087357PCBB6. Zero wattage is recorded against these lights so there is no impact on submission.
	Two lights at Kimbolton-Stafford roundabout have a blank gear wattage but are expected to have a zero.
	Pole ID 3028 had a 150w SON-T (HPS) - 150W lamp type with a gear wattage for a 250W SON-T (HPS) leading to over submission of 42 kWh per annum.
	The data used for submission does not track changes at a daily basis and is provided as a snapshot.
	Potential impact: Medium
	Actual impact: Medium
	Audit history: Multiple times
From: 01-Jan-24	Controls: Moderate
To: 06-Feb-24	Breach risk rating: 4
Audit risk rating	Rationale for audit risk rating
Medium	Controls are rated as moderate overall:
	<ul> <li>based on the field audit the best available estimate is not precise enough to conclude that the database is accurate within ±5%,</li> <li>most information is accurate, and</li> <li>the values applied for submission are adjusted and not consistent with the raw data from RAMM; it appears that in some cases the adjustments increased accuracy, and others decreased accuracy.</li> <li>The impact is assessed to be medium, based on the kWh differences described above. Revised submission data will be provided through the wash up process.</li> </ul>

Actions taken to resolve the issue	Completion date	Remedial action status
MDC are aware of the findings and Genesis will continue to work with MDC in improving their database accuracy	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will	Completion	
occur	date	

Description and capacity of	scription and capacity of load		
Non-compliance	C	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3	Three lights at Waughs Road were installed at a turning bay by MDC but do not have lamp model, lamp wattage or gear wattage recorded. The light details are to be confirmed.		
	Two lights at Kimbolton-Stafford roundabout have a blank gear wattage but are expected to have a zero.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Multiple times		
From: 19-Jan-24	Controls: Strong		
To: 19-Jan-24	Breach risk rating: 1		
Audit risk rating	Rationale	for audit risk rati	ng
Low	Controls are rated as strong, the exce one lamp installation job where the li by Max Tarr.		-
	The impact is assessed to be low base Revised submission data is expected t at Waughs Road are confirmed.		
Actions tak	en to resolve the issue	Completion date	Remedial action status
MDC are aware of the find work with MDC in improvi	ings and Genesis will continue to ng their database accuracy	Continuous Improvement	Identified
Preventative actions tal	ken to ensure no further issues will occur	Completion date	
MDC are aware of the find work with MDC in improvi	ings and Genesis will continue to ng their database accuracy	Continuous Improvement	

All load recorded in datab	oad recorded in database		
Non-compliance	0	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 06-Feb-24 To: 06-Feb-24	The field audit identified three lights <ul> <li>one 22W LED (pole 475837)</li> </ul>	which were not re outside number 6 outside number 1	5 A'Court St, Sanson, 16-18 Hedges St, Sanson, and
	Breach risk rating: 2		
Audit risk rating	Rationale	for audit risk rati	ing
Low	<ul> <li>differences were found when checking</li> <li>The impact is assessed to be low becange</li> <li>the three additional lights have been been been been been been been be</li></ul>	because: ts have resulted in under reporting of 68W or 290 or rate across the whole database, where an extra ng a sample of 6,475W, there could be potential	
Actions tak	en to resolve the issue	Completion date	Remedial action status
MDC are aware of the find work with MDC in improvi	ings and Genesis will continue to ng their database accuracy	Continuous improvement	Identified
Preventative actions tal	ken to ensure no further issues will occur	Completion date	
MDC are aware of the find work with MDC in improvi	ings and Genesis will continue to ng their database accuracy	Continuous improvement	

Database accuracy					
Non-compliance	C	Description			
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)		s of load on 6 February 2024, the best gh to conclude that the database is accurate submission of 3,500 kWh per annum.			
10.070(0)	Three lights at Waughs Road which w have lamp model, lamp wattage or ge be confirmed.				
	Two lights at Leithbridge Street do not have lamp model, lamp wattage or gear wattage recorded. They are metered floodlights, and not required to be reported as part of the DUML load and should not be recorded against DUML ICP 0900087357PCBB6. Zero wattage is recorded against these lights so there is no impact on submission.				
	Two lights at Kimbolton-Stafford rou expected to have zero.	undabout have a	blank gear wattage but are		
	Pole ID 3028 had a 150w SON-T (HPS) 250W SON-T (HPS) leading to over su		DW lamp type with a gear wattage for a sion of 42 kWh per annum.		
	Potential impact: Medium		F		
	Actual impact: Medium				
	Audit history: Twice				
From: 19-Jan-24	Controls: Moderate				
To: 06-Feb-24	Breach risk rating: 2				
Audit risk rating	Rationale	Rationale for audit risk rating			
Low	<ul> <li>Controls are rated as moderate overall:</li> <li>based on the field audit the best available estimate is not precise enough to conclude that the database is accurate within ±5%, and</li> <li>most information is accurate.</li> <li>The impact is assessed to be low based on the kWh differences described above.</li> </ul>				
Actions tak	en to resolve the issue	Completion date	Remedial action status		
	ings and Genesis will continue to ng their database accuracy	Continuous improvement	Identified		
Preventative actions tal	ken to ensure no further issues will occur	Completion date			
	ings and Genesis will continue to ng their database accuracy	Continuous improvement			

Volume information accu	acy			
Non-compliance	[	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	the database extract provided for sub	audit in January 2024 was not consistent with mission in January 2024. Some of the ning of light changes. The differences could <wh annum.<="" per="" td=""></wh>		
	Based on the field survey of 228 item available estimate is not precise enou within ±5% leading to potential over	igh to conclude th	nat the database is accurate	
		stalled at a turning bay by MDC but do not ear wattage recorded. The light details are to		
	wattage recorded. They are metered as part of the DUML load and should	ot have lamp model, lamp wattage or gear floodlights, and not required to be reported not be recorded against DUML ICP recorded against these lights so there is no		
	Two lights at Kimbolton-Stafford rou expected to have a zero.	ndabout have a bl	ank gear wattage but are	
	Pole ID 3028 had a 150w SON-T (HPS 250W SON-T (HPS) leading to over su			
	The data used for submission does no as a snapshot.	ot track changes a	t a daily basis and is provided	
	Potential impact: Medium			
	Actual impact: Medium			
	Audit history: Multiple times			
From: 01-Jan-24	Controls: Moderate			
To: 06-Feb-24	Breach risk rating: 4	<pre>crating: 4</pre>		
Audit risk rating	Rationale for audit risk rating			
-				
Medium	<ul> <li>to conclude that the database</li> <li>most information is accurate</li> <li>the values applied for submineraw data from RAMM. It applicates accuracy, and other</li> <li>The impact is assessed to be medium</li> </ul>	best available estimate is not precise enough se is accurate within ±5%, e, and ission are adjusted and not consistent with the pears that in some cases the adjustments		
	above. Revised submission data will	be provided throu	ugh the wash up process.	
Actions ta	ken to resolve the issue	Completion date	Remedial action status	
	dings and Genesis will continue to ving their database accuracy	Continuous Identified improvement		

Preventative actions taken to ensure no further issues will occur	Completion date
MDC are aware of the findings and Genesis will continue to work with MDC in improving their database accuracy	Continuous improvement