

Compliance plan for Napier CC DUML 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-Apr-23</p> <p>To: 16-Feb-24</p>	<p>In absolute terms, total annual consumption is estimated to be 87,900 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>46 lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 20,403 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls are rated as weak as the field findings indicate that the database management processes have not improved during the audit period.</p> <p>The impact is assessed to high due to the potential impact on settlement accuracy.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>		Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>		Continuous improvement	

ICP identifier and items of load			
Non-compliance	Description		
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 01-Jan-23</p> <p>To: 08-Feb-24</p>	<p>Ten items of load without an ICP which appear to be Council lights.</p> <p>Six items of load with an ICP which appear to be private.</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 because these issues have been present for several years.</p> <p>The audit risk rating is low because there are only 16 items of load with incorrect ICPs. It was previously thought many more did not have ICPs, but it's now evident the ICP identifiers were being removed as part of the reporting process.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>		Continuous improvement	
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>		Continuous improvement	

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: 01-Apr-23</p> <p>To: 16-Feb-24</p>	<p>Four additional lights were found in the field of 400 items of load sampled.</p> <p>Errors are still present from previous audits.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are recorded as weak as the processes in place do not ensure that the changes in the database are updated.</p> <p>The impact is assessed to be low based on number of additional lights found in the field in comparison to the overall number of lights checked.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>	Continuous improvement	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Apr-23</p> <p>To: 16-Feb-24</p>	<p>In absolute terms, total annual consumption is estimated to be 87,900 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>Incorrect ICP identifiers because they are against the pole not the light.</p> <p>No ICPs for the WTU0331 NSP.</p> <p>46 lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 20,403 kWh.</p> <p>16 items of load with the incorrect ICP identifier recorded.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the field findings indicate that the database management processes do not track changes made in the field especially in relation to the addition of new lights to the database.</p> <p>The impact on settlement and participants is assessed to be high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>	Continuous improvement	

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-Apr-23</p> <p>To: 16-Feb-24</p>	<p>In absolute terms, total annual consumption is estimated to be 87,900 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>46 lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 20,403 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the field findings indicate that the database management processes have not improved during the audit period.</p> <p>The impact is assessed to high due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>A recent change in providing data extracts has recently taken place (December 2023) and Genesis has started working with POPE who have been made aware of the accuracy issues and changes not updated.</p> <p>Genesis will continue to work with POPE to increase the accuracy of the database.</p>	Continuous improvement	