

## Compliance plan for Palmerston North CC (Mercury) – March 2024

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 15-Jan-24 To: 07-Mar-24</p>	<p>328 items of load and 46,092.6 W recorded against DUML ICPs in the database are excluded from submissions. Some of the load may be validly excluded and PNCC intends to investigate.</p> <p>The DUML load is submitted using HHR profile, without an exemption in place.</p> <p>The field audit found the database was found not accurate within <math>\pm 5\%</math>, resulting in potential under submission of 157,300 kWh per annum.</p> <p>The lamp description for "Terraed Mini 34W AP2 4000k" is incorrect and should be "Terraed Mini 24W AP2 4000k". The lamp and gear wattages for the 83 affected lamps are correct, and there is no impact on submission.</p> <p>37 LED items of load connected to DUML ICPs have a blank gear wattage but should have a gear wattage of zero. There is no impact on submission.</p> <p>Two lamp models have wattages which differ from the expected value based on the lamp specifications, resulting in potential under submission 17 kWh per annum.</p> <p>Seven disconnected lamps have wattages recorded in the database against DUML ICPs, resulting in over submission of 2,992 kWh per annum.</p> <p>14 items of load had gear wattages inconsistent with the lamp make and model which could result in over submission of 68 kWh per annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times Controls: Moderate Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls over the database are moderate, and PNCC has indicated that they intend to check and correct the discrepancies.</p> <p>The impact is assessed to be high, based on the kW differences identified.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>PNCC are aware of the discrepancies and are investigating with the intention to correct any issues, we will follow up. Regarding the DUML load being submitted using the HHR profile, Mercury</p>	<p>July 2024</p>	<p>Investigating</p>

is working on a profile application which will allow HH submission for DUMML.		
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
PNCC are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3  From: 28-Feb-23 To: 15-Jan-24	There is insufficient location information to allow pole ID 64681 to be readily located.  Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong, as almost all lights had sufficient address information recorded.  The audit risk rating is low because only one light had insufficient address information recorded and it was connected recently.	
Actions taken to resolve the issue	Completion date	Remedial action status
PNCC have advised that this has now been updated.	20.03.2024	Identified
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
PNCC are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3  From: 28-Feb-23 To: 15-Jan-24	37 LED items of load connected to DUML ICPs have a blank gear wattage but should have a gear wattage of zero.  Potential impact: Low  Actual impact: Low  Audit history: Once  Controls: Strong  Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are strong, as almost all connected lights have valid gear wattages recorded. There is no impact because all the missing wattages should be zero.	
Actions taken to resolve the issue	Completion date	Remedial action status
PNCC are aware of this issue and are investigating with the intention to update so that the database has zero for the gear wattage where appropriate rather than blank, we will follow up.	July 2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
PNCC are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	

Database accuracy	
Non-compliance	Description
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	<p>The field audit found the database was found not accurate within <math>\pm 5\%</math>, resulting in potential under submission of 157,300 kWh per annum.</p> <p>The lamp description for "Terraed Mini 34W AP2 4000k" is incorrect and should be "Terraed Mini 24W AP2 4000k". The lamp and gear wattages for the 83 affected lamps are correct, and there is no impact on submission.</p> <p>Two lamp models have wattages which differ from the expected value based on the lamp specifications, resulting in potential under submission 17 kWh per annum.</p> <p>Seven disconnected lamps have wattages recorded in the database against DUML ICPs, resulting in over submission of 2,992 kWh per annum.</p> <p>14 items of load had gear wattages inconsistent with the lamp make and model which could result in over submission of 68 kWh per annum.</p> <p>Pole ID 64681 has insufficient address information recorded to enable it to be readily located.</p> <p>Potential impact: High Actual impact: Unknown</p>

From: 15-Jan-24 To: 07-Mar-24	Audit history: Multiple times Controls: Moderate Breach risk rating: 6		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>High</b>	The controls over the database are moderate, and PNCC has indicated that they intend to check and correct the discrepancies. The impact is assessed to be high, based on the kW differences identified.		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
PNCC have advised that The lamp description for "Terraed Mini 34W AP2 4000k" has been updated to "Terraed Mini 24W AP2 4000k" as of 20.03.2024. They are investigating the other issues with the intention to correct, we will follow up.	July 2024	Investigating	
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>		
PNCC are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing		

<b>Volume information accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	<p>328 items of load and 46,092.6 W recorded against DUMML ICPs in the database are excluded from submissions. Some of the load may be validly excluded and PNCC intends to investigate.</p> <p>The DUMML load is submitted using HHR profile, without an exemption in place.</p> <p>The field audit found the database was found not accurate within <math>\pm 5\%</math>, resulting in potential under submission of 157,300 kWh per annum.</p> <p>The lamp description for "Terraed Mini 34W AP2 4000k" is incorrect and should be "Terraed Mini 24W AP2 4000k". The lamp and gear wattages for the 83 affected lamps are correct, and there is no impact on submission.</p> <p>37 LED items of load connected to DUMML ICPs have a blank gear wattage but should have a gear wattage of zero. There is no impact on submission.</p> <p>Two lamp models have wattages which differ from the expected value based on the lamp specifications, resulting in potential under submission 17 kWh per annum.</p> <p>Seven disconnected lamps have wattages recorded in the database against DUMML ICPs, resulting in over submission of 2,992 kWh per annum.</p> <p>14 items of load had gear wattages inconsistent with the lamp make and model which could result in over submission of 68 kWh per annum.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.</p> <p>Potential impact: High</p>

From: 15-Jan-24 To: 07-Mar-24	Actual impact: Unknown Audit history: Multiple times Controls: Moderate Breach risk rating: 6	
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>	
<b>High</b>	The controls over the database are moderate, and PNCC has indicated that they intend to check and correct the discrepancies.  The impact is assessed to be high, based on the kW differences identified.	
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>
PNCC are aware of the discrepancies and are investigating with the intention to correct any issues, we will follow up. Regarding the DUML load being submitted using the HHR profile, Mercury is working on a profile application which will allow HH submission for DUML.	July 2024	Investigating
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
PNCC are aware of the importance of having an accurate database and we will continue to liaise with them on this.	Ongoing	