Compliance Plan Christchurch City Council - Mainpower DUML 2021

Distributed Unmetered Load audit				
Non-compliance	Description			
Audit Ref: 1.10	Submission data was not provided within the required time frame.			
With: Clause 16A.26	Potential impact: Low			
	Actual impact: Low			
From: 26-Feb-20	Audit history: None			
To: 03-May-21	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	
			Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
The timely provision of information was impacted by the various other compliance related requests at that time. Since May 2021 significant additional resource has been added to the wider team and audits since this time have not been affected.		Completed late 2021		

Deriving submission information				
Non-compliance	Des	cription		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,368 kWh per annum of under submission.			
Softedule 1919	The database accuracy is assessed to be 48% less than is recorded in the database. Resulting in an estimated over submission of 10,699 kWh per annum (based on 4,271 annually			
	The monthly database extract used for submission does not track changes at a daily basis and is provided as a snapshot.			
	Potential impact: Medium			
	Actual impact: Medium			
From: 26-Feb-20 Audit history: Three times previously				
To: 03-May-21	Controls: None			
,	Breach risk rating: 8			
Audit risk rating	Rationale for audit risk rating			
Medium	Controls are rated as none as this database is no longer being maintained. The impact is assessed to be medium, based on the potential kWh variances detailed above but this will increase until an alternative database is found to manage this load.			
Actions taken to resolve the issue		Completion date	Remedial action status	
We will use the findings from the (complete) field audit completed in May 2021 for all submissions from 1/5/2021 until such time as we get better information from an additional field audit, or the Council providing a database extract again.		31/1/2022	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
The Council discontinued their database management service with Mainpower in early 2021 and despite numerous requests we have not been able to find anyone within Council who can answer our questions. We will continue to make enquiries and push for resolution to this unfortunate scenario.		Unknown		

Database Accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	The database accuracy is assessed to be 48% less than is recorded in the database. Resulting in an estimated over submission of 10,699 kWh per annum (based on 4,271 annual burn hours). Load changes no longer tracked in the Mainpower database.			
	Potential impact: Medium			
From: 26-Feb-20	Actual impact: Medium			
	Audit history: Three times previously			
To: 03-May-21	Controls: None			
,	Breach risk rating: 8			
Audit risk rating	Rationale for audit risk rating			
Medium	ium Controls are rated as none as this database is no longer being maintained			
	The impact is assessed to be medium, based on the potential kWh variances detailed above but this will increase until an alternative database is found to manage this load.			
Actions taken to resolve the issue		Completion date	Remedial action status	
We will use the findings from the (complete) field audit completed in May 2021 for all submissions from 1/5/2021 until such time as we get better information from an additional field audit, or the Council providing a database extract again.		31/1/2022	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
The Council discontinued their database management service with Mainpower in early 2021 and despite numerous requests we have not been able to find anyone within Council who can answer our questions. We will continue to make enquiries and push for resolution to this unfortunate scenario.		Unknown		

Volume information accuracy				
Non-compliance	Description			
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	Variance in light volumes reported to Simply Energy vs what is recorded in the database is likely to be resulting in an estimated 2,368 kWh per annum of under submission.			
13.37 5(0)	The database accuracy is assessed to be 48% less than is recorded in the database. Resulting in an estimated over submission of 10,699 kWh per annum (based on 4,271 annually			
	The monthly database extract used for submission does not track changes at a dabasis and is provided as a snapshot.			
	Potential impact: Medium			
	Actual impact: Medium			
Audit history: Three times previously				
From: 26-Feb-20	Controls: None			
To: 03-May-21	Breach risk rating: 8			
Audit risk rating	Rationale for audit risk rating			
Medium	Controls are rated as none as this database is no longer being maintained.			
	The impact is assessed to be medium, based on the potential kWh variances detailed above but this will increase until an alternative database is found to manage this load.			
Actions taken to resolve the issue		Completion date	Remedial action status	
We will use the findings from the (complete) field audit completed in May 2021 for all submissions from 1/5/2021 until such time as we get better information from an additional field audit, or the Council providing a database extract again.		31/1/2022	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
The Council discontinued their database management service with Mainpower in early 2021 and despite numerous requests we have not been able to find anyone within Council who can answer our questions. We will continue to make enquiries and push for resolution to this unfortunate scenario.		Unknown		