

Compliance Plan Christchurch CC DUML 2021

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 06-Feb-20</p> <p>To: 31-Dec-20</p>	<p>Estimated under submission of 30,934.87 kWh from October to December 2020 due to the smart light volumes being omitted from submission.</p> <p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual under submission of 5,300 kWh.</p> <p>45 lamps have incorrect total wattages, resulting in an estimated under submission of 279W or 1,192 kWh p.a. based on 4,271 burn hours.</p> <p>42.36 kW relating to smart lights connected to “reconciled elsewhere” status ICPs 0007182097RN3F9, 0007182098RNC27 and 0007182100RN8D0, are reconciled under the DUML ICP for the same NSP. The on hours for these ICPs may differ to the logger hours, because they are controlled by daylight sensors.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as weak as the reconciliation process has weak checks in place to ensure submission is correct. These are largely manual and are not robust when the volume of unmetered load being reconciled is considered.</p> <p>The impact is assessed to be medium based on the effect on submission for the months where the smart light submission volumes were missing.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The issue related to the inactive ICP capacities not being reconciled was identified by Simply Energy prior to audit (February 2021) and affected periods were all fixed at the next available revision.</p> <p>Incorrect Ballasts were corrected. Orion submit wash-up daily capacity values which are processed, so volumes were corrected with the market at the next opportunity.</p> <p>There is currently not (an operational) solution for correctly calculating the on-hours of the smart lights. We believe the current methodology is the best available at the current time.</p>		<p>Complete</p> <p>Complete</p> <p>Unknown</p>	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 06-Feb-20 To: 31-Dec-20	Three lights not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Three times previously Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate. The volume of errors occurring since the LED rollout indicate there is room for improvement. The impact is assessed to be low, due to the small number of additional lights found as part of the field audit.	
Actions taken to resolve the issue	Completion date	Remedial action status
Orion completed a field check of issues identified and where required updated RAMM to record the correct values from the change/start date. Orion submit wash-up daily capacity values which are processed, so volumes were corrected with the market at the next opportunity.	Complete	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 06-Feb-20</p> <p>To: 31-Dec-20</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual under submission of 5,300 kWh.</p> <p>45 lamps have incorrect total wattages, resulting in an estimated under submission of 279W or 1,192 kWh p.a. based on 4,271 burn hours.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
Low	<p>Controls are rated as moderate. The volume of errors occurring since the LED rollout indicate there is room for improvement.</p> <p>The impact is assessed to be low, based on the potential kWh variances detailed above. .</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Orion completed a field check of issues identified and where required updated RAMM to record the correct values from the change/start date. Orion submit wash-up daily capacity values which are processed, so volumes were corrected with the market at the next opportunity.		Complete	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Volume information accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 06-Feb-20</p> <p>To: 31-Dec-20</p>	<p>Estimated under submission of 30,934.87 kWh from October to December 2020 due to the smart light volumes being omitted from submission.</p> <p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual under submission of 5,300 kWh.</p> <p>45 lamps have incorrect total wattages, resulting in an estimated under submission of 279W or 1,192 kWh p.a. based on 4,271 burn hours.</p> <p>42.36 kW relating to smart lights connected to “reconciled elsewhere” status ICPs 0007182097RN3F9, 0007182098RNC27 and 0007182100RN8D0, are reconciled under the DUMML ICP for the same NSP. The on hours for these ICPs may differ to the logger hours, because they are controlled by daylight sensors.</p> <p>Potential impact: High</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>Controls are rated as weak as the reconciliation process has weak checks in place to ensure submission is correct. These are largely manual and are not robust when the volume of unmetered load being reconciled is considered.</p> <p>The impact is assessed to be medium based on the effect on submission for the months where the smart light submission volumes were missing.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>The issue related to the inactive ICP capacities not being reconciled was identified by Simply Energy prior to audit (February 2021) and affected periods were all fixed at the next available revision.</p> <p>Orion completed a field check of issues identified and where required updated RAMM to record the correct values from the change/start date. Orion submit wash-up daily capacity values which are processed, so volumes were corrected with the market at the next opportunity.</p> <p>There is currently not (an operational) solution for correctly calculating the on-hours of the smart lights. We believe the current methodology is the best available at the current time.</p>		<p>Complete</p> <p>Complete</p> <p>Unknown</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur		Completion date	