

Compliance Plan Christchurch CC Unmetered Traffic Lights 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: 19-May-20</p> <p>To: 17-Mar-21</p>	<p>Estimated 444,770.64 kWh of under submission from October 2020 up to March 2021 since switching to the CTCS participant code.</p> <p>The database contained some incorrect daily kWh information, resulting in minor under submission of an estimated 285 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls were rated as none, because they are not sufficient to ensure that submission data is calculated accurately.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>After the material change audit was completed and approved in approximately August 2021, Dummy meters were created, and correct volumes were reconciled from the switch date via the usual reconciliation revision periods.</p> <p>The database was updated during the audit to be correct.</p>	<p>31/8/2021</p> <p>30/4/2021</p>	<p>Identified</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Issue relating to material change was a one-off related to migration of ICPs from the CTCT to the CTCS code and management of that by Simply Energy; we do not anticipate this issue being encountered again.</p>	<p>N/a</p>	

Location of each item 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: 19-May-20</p> <p>To: 17-March-21</p>	<p>ICP number is not recorded in RTOAD. All items of load have a GXP recorded, and this GXP information is used to map to the correct ICP.</p> <p>Potential impact: None</p> <p>Actual impact: None</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 were rated as weak. An ICP number field is available in RTOAD but is not used.</p> <p>The impact is assessed to be low. ICP numbers can be determined from the GXP information because there is a 1:1 relationship between GXP and ICP, and the GXP is populated for every item of load. There is no impact on submission.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
A new field was added to RTOAD and populated with the ICP. The ICP is now also included on the Power Invoice listing that is provided by CTOC to Simply Energy.		30/6/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11(2A) of Schedule 15.3 From: 20-May-20 To: 17-Mar-21	Eleven traffic safety cameras were missing from the database. Potential impact: Low Actual impact: Low Audit history: once Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as moderate, because they are sufficient to ensure the database is accurate most of the time. The impact is low because the wattage of the missing cameras is 0.048 kWh per day.	
Actions taken to resolve the issue	Completion date	Remedial action status
A field audit completed by CTOC has found that these extra traffic Cameras identified via this audit are not owned by the Council and are therefore outside the scope of this audit. These cameras are owned by NZ Police. These lights have been added to RTOAD for future reference and tagged as NZ Police owned for clarity.	N/a	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 19-May-20 To: 17-Mar-21	No audit trail of changes made in the access database. Potential impact: Low Actual impact: Low Audit history: Multiple times Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak because audit trails do not exist. The impact is rated as low, because it does not affect submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
		Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
CTOC are currently running a parallel system between Access and RAMM with a view to transition to RAMM within 2 years. Dynamic dimming throughout the year – formula currently used in access – this is the roadblock to transition of electricity submission to RAMM as this will need to be replicated and is complex.	2024	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 19-May-20</p> <p>To: 17-Mar-21</p>	<p>The database contained some incorrect daily kWh information, resulting in minor under submission of an estimated 285 kWh per annum.</p> <p>ICP number is not recorded in the database.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls were rated as moderate overall because they are sufficient to ensure that database wattage is accurate for most of the sites.</p> <p>The impact is assessed to be low as the discrepancies found will only have a very minor effect on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>The affected power calculation formula was updated.</p> <p>A new field was added to RTOAD and populated with the ICP. The ICP is now also included on the Power Invoice listing that is provided by CTOC to Simply Energy.</p>	<p>30/6/2021</p> <p>30/6/2021</p>	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: 19-May-20</p> <p>To: 17-Mar-21</p>	<p>Estimated 444,770.64 kWh of under submission from October 2020 up to March 2021 since switching to the CTCS participant code.</p> <p>The database contained some incorrect daily kWh information, resulting in minor under submission of an estimated 285 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: None</p> <p>Breach risk rating: 12</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls were rated as none, because they are not sufficient to ensure that submission data is calculated accurately.</p> <p>The impact is assessed to be high due to the level of submission inaccuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>After the material change audit was completed and approved in approximately August 2021, Dummy meters were created, and correct volumes were reconciled from the switch date via the usual reconciliation revision periods.</p> <p>The affected power calculation formula was updated.</p>	<p>31/8/2021</p> <p>30/6/2021</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	