

Compliance plan for Kapiti Retirement Trust DUML – 2020

Participants to give access		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 16-Sep-20 To: 16-Feb-21	The audit was not completed by the due date. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate because only one data item was provided late. The audit risk rating is medium because the information was not provided in time for the audit to be completed before its due date.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will ensure that their audits are completed in a timely manner	30/11/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy will work with the customer to ensure that Audits are completed in a timely manner	30/11/2021	

Participants to give access		
Non-compliance	Description	
Audit Ref: 1.11 With: Clause 16A.4 From: 16-Sep-20 To: 16-Feb-21	Submission information was not provided within 15 business days of the request. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are rated as moderate because only one data item was provided late. The audit risk rating is medium because the information was not provided in time for the audit to be completed before its due date.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will complete their obligations in the required timeframe	30/11/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy will ensure they meet their regulatory obligations	30/11/2021	

Deriving submission information		
Non-compliance	Description	
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3 From: 21-Oct-20 To: 31-Dec-20	Submissions are not calculated using current spreadsheet information. The spreadsheet is not accurate within $\pm 5.0\%$. Lamp installation, change, and removal dates are not recorded in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak, because they are not sufficient to ensure that data for most lamps is recorded correctly. The impact is low: <ul style="list-style-type: none"> the wattage differences could result in estimated under reporting of approximately 538 kWh per annum if the current database information was used for submission, the spreadsheet contains 39 items of load and 2,022W, changes are infrequent, and occur mainly when faulty lights are replaced, and the difference between the actual wattage found in the field and wattage applied for submission is small. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will work with the customer to ensure that their database is sent to Contact Energy on a regular basis	30/11/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy will work with the customer to ensure that their database is sent to Contact Energy on a regular basis	30/11/2021	

ICP identifier and items of load		
Non-compliance	Description	
Audit Ref: 2.2 With: Clause 11(2)(a) and (aa) of Schedule 15.3 From: 06-Oct-20 To: 21-Oct-20	The ICP number is not recorded in the spreadsheet or spreadsheet name. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as moderate and there is not expected to be any impact because the spreadsheet is clearly named, and all items of load relate to ICP 0015768900ELB35.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will ensure that that the ICP number is included in the database as well as in the filename of the database	30/11/2021	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy to work with the customer to ensure that the ICP number is included in each line of the spreadsheet	30/11/2021	

Tracking of load changes		
Non-compliance	Description	
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: 06-Oct-20 To: 21-Oct-20	Lamp installation, change, and removal dates are not recorded in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak because installation, change and removal dates are not recorded and it is not possible to derive the load in kW for any given day. The impact is low, because the spreadsheet contains 39 items of load and 2,022W. Changes are infrequent, and occur mainly when faulty lights are replaced.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will work with the customer to have the database updated	30/11/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy to work with the customer to ensure that the Installation, change and removal dates are included in each line of the spreadsheet	30/11/2021	

Audit trail		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 06-Oct-20 To: 21-Oct-20	The spreadsheet does not contain an audit trail. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as strong and the impact as low, because all the information required to meet the audit trail requirements is available, although it is not formally recorded within the spreadsheet.	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact will investigate this the customer possible methods to include an appropriate method to apply an audit trail within the spreadsheet 'Database'	30/11/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b) From: 06-Oct-20 To: 21-Oct-20	The spreadsheet is not accurate within $\pm 5.0\%$. Lamp installation, change, and removal dates are not recorded in the spreadsheet. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	Controls are rated as weak, because they are not sufficient to ensure that data for most lamps is recorded correctly. The impact is low: <ul style="list-style-type: none"> the wattage differences could result in estimated under reporting of approximately 538 kWh per annum if the current database information was used for submission, and the spreadsheet contains 39 items of load and 2,022W, changes are infrequent, and occur mainly when faulty lights are replaced. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will work with the customer to have the database updated	30/11/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy to work with the customer to ensure that the wattage is correct and the Installation, change and removal dates are included in each line of the spreadsheet	30/11/2021	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 21-Oct-20</p> <p>To: 31-Dec-20</p>	<p>Submissions are not calculated using current spreadsheet information.</p> <p>The spreadsheet is not accurate within $\pm 5.0\%$.</p> <p>Lamp installation, change, and removal dates are not recorded in the spreadsheet.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Once</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as weak, because they are not sufficient to ensure that data for most lamps is recorded correctly.</p> <p>The impact is low:</p> <ul style="list-style-type: none"> the wattage differences could result in estimated under reporting of approximately 538 kWh per annum if the current database information was used for submission, the spreadsheet contains 39 items of load and 2,022W, changes are infrequent, and occur mainly when faulty lights are replaced, and the difference between the actual wattage found in the field and wattage applied for submission is small. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Contact Energy will work with the customer to have the database updated	30/11/2021	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Contact Energy to work with the customer to ensure that the wattage is correct and the Installation, change and removal dates are included in each line of the spreadsheet	30/11/2021	