

## Compliance plan for Hamilton CC DUML 2022

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Jan-21</p> <p>To: 28-Jul-22</p>	<p>Christmas light volumes included for the whole year and not the electrically connected period.</p> <p>Analysis of the ballasts applied indicate a minor under submission of 3,846 kWh per annum.</p> <p>Analysis of the database found 72 lights with a light description that could not be verified, or the incorrect wattage applied according to the light specifications. This will be resulting in an estimated over submission of an estimated 700 kWh per annum.</p> <p>Submission is based on a snapshot of the database at the end of the month and does not consider historic adjustments or the fact that lights can be lived before they are entered into the database.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be low due to the overall database accuracy being good and the few variances found are in the process of being fixed.</p>	
Actions taken to resolve the issue		Completion date
Genesis will be reviewing the customers dataset to enable Genesis to provide HCC with an overview of exceptions to enable the database compliance to be met.		31/10/2022
Preventative actions taken to ensure no further issues will occur		Completion date
		Remedial action status
		Identified

<p>Genesis Energy has recently regained ownership of the HCC database. It is Genesis's intension to discuss the solution with the customer in order to mitigate the risk associated with</p> <ol style="list-style-type: none"> <li>1. Christmas lights</li> <li>2. Incorrect ballast allocations</li> <li>3. Snapshot based submissions – Genesis would need to review the HCC dataset to ensure tracking of change was occurring to assist with historical settlements, enabling compliance to be met.</li> </ol>	31/10/2022	
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All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3  From: 01-Jan-21 To: 28-Jul-22</p>	<p>One item of load missing from the database. Potential impact: Low Actual impact: Low Audit history: Multiple times previously Controls: Strong Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>Low</b></p>	<p>The controls are rated as strong, because they are sufficient to ensure that lamp information accuracy is at an acceptable level.  The impact is rated as low as only one additional item of load was found.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis will provide the missing asset information to the customer with the intent the council adds the missing asset immediately.</p>	31/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis will reiterate the importance of having a complete and accurate database and will discuss with the council their ability and or frequency of asset audits.</p>	31/10/2022	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jan-21</p> <p>To: 28-Jul-22</p>	<p>Analysis of the ballasts applied indicate an estimated under submission of 3,846 kWh per annum.</p> <p>Analysis of the database found 72 lights with a light description that could not be verified, or the incorrect wattage applied according to the light specifications. This will be resulting in an estimated under submission of an estimated 700 kWh per annum.</p> <p>Christmas light volumes included for the whole year and not the electrically connected period.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are rated as moderate, because the inaccuracies are being addressed through the LED roll out and accuracy will continue to improve.</p> <p>The impact is assessed to be low due to the overall database accuracy being good and the few variances found are in the process of being fixed.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will be reviewing the customers dataset to enable Genesis to provide HCC with an overview of exceptions to enable the database compliance to be met.		31/10/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Jan-21</p> <p>To: 28-Jul-22</p>	<p>Christmas light volumes included for the whole year and not the electrically connected period.</p> <p>Analysis of the ballasts applied indicate a minor under submission of 3,846 kWh per annum.</p> <p>Analysis of the database found 72 lights with a light description that could not be verified, or the incorrect wattage applied according to the light specifications. This will be resulting in an estimated over submission of an estimated 700 kWh per annum.</p> <p>Submission is based on a snapshot of the database at the end of the month and does not consider historic adjustments or the fact that lights can be lived before they are entered into the database.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as moderate, because they are sufficient to ensure that lamp information is correctly recorded most of the time.</p> <p>The impact is assessed to be low due to the overall database accuracy being good and the few variances found are in the process of being fixed.</p>	
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