

## Compliance plan for Hutt CC DUML – 2022

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 and 17.295F From: 08-Dec-21 To: 06-Sep-22	The audit was not completed by the due date. Potential impact: High Actual impact: Unknown Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	Controls are assessed to be weak as the audit was nine months overdue. The delays were caused by staffing changes in the HCC streetlight management area. The impact is assessed to be low, because completing the audit earlier was unlikely to impact on compliance.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis Energy has appointment a DUML Data & Stakeholder Lead to provide information	01/08/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis Energy has appointment a DUML Data & Stakeholder Lead to provide information	01/08/2022	

Deriving submission information	
Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	The database is not accurate within $\pm 5\%$ . There is a 95% level of confidence that the annual consumption is between 198,000 to 1,117,700 kWh p.a. lower than the database indicates. Database extracts have not consistently been provided to Genesis monthly; or included wattage information. Some submission volumes for September 2021 and July 2022 were not consistent with the expected values based on the database extract and logger hours. 44 items of load totalling 2,561 W have "Properties UrbanPlus" recorded in the ICP number field and are excluded from submissions. LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.

<p>From: 01-Jan-22 To: 31-Jul-22</p>	<p>Where more than one light model field was populated, the lamp, gear and total wattage in most cases reflected the values for only one of the recorded light models and in some cases were inconsistent with the expected values for any of the models.</p> <p>Where only one light model field was populated, the recorded lamp and gear wattage did not always reflect the expected wattage.</p> <p>85 items of load do not have information populated in the light model fields. 53 of these had some information populated in the "If Other Light Type Pls Specify" field, and I confirmed that 42 had a wattage consistent with that description. 35 had insufficient information to confirm the correct wattages, and eight had wattages inconsistent with the description.</p> <p>22 poles had a zero gear wattage when a non-zero value was expected.</p> <p>There is not a clear process to communicate festive light wattages and on and off dates to Genesis. Under submission is expected as festive lights wattages were not included in the January 2022 database extract provided to Genesis.</p> <p>The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<p><b>High</b></p>	<p>The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.</p> <p>To reduce the impact of the non-compliance where the database information excluded wattages, Genesis calculated the expected wattage based on the lamp model information, and where database extracts were not provided monthly, Genesis used the most recent information available to calculate submissions.</p> <p>The audit risk rating is high based on kWh variances identified.</p>		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
<p>Genesis has advised the Hutt CC of the audit outcome regarding the discrepancy between what is out in field and what has been recorded within the council data base; with the intent that council makes every effort to ensure the exceptions are rectified.</p> <p>Genesis has also advised Hutt CC that Genesis requires monthly extracts that track any changes within the month to meet the DUML regulations.</p> <p>In regard to festive lights Genesis has advised Hutt CC to notify when the festive lights have been turned on/off.</p> <p>Genesis will look to investigate submission volumes with the intent to correct were necessary.</p>	<p>Continuous improvement</p>	<p>Identified</p>	

Preventative actions taken to ensure no further issues will occur	Completion date
Genesis continues to work with the council to raise database accuracy levels.	Continuous improvement

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: 01-Jan-22 To: 31-Jan-22	44 items of load totalling 2,561 W have "Properties UrbanPlus" recorded in the ICP number field.  Potential impact: Medium  Actual impact: Medium  Audit history: Three times  Controls: Moderate  Breach risk rating: 4	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	The controls over the database are rated as moderate. Once the data is moved to RAMM I expect that a separate database will be created for this load and the controls will improve to strong.  The impact is assessed to be medium because lights with "Properties UrbanPlus" recorded as the ICP number are excluded from submissions and could result in under submission of 10,938 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis will investigate this further in regard to creating separate ICP's.	Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

Description and capacity of load	
Non-compliance	Description
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3	LED make and model details are not recorded in the database.  85 items of load do not have information populated in the light model fields, and 32 of these also have no information populated in the "If Other Light Type Pls Specify" field.  22 poles had a zero-gear wattage when a non-zero value was expected.  Potential impact: Unknown  Actual impact: Medium

From: 01-Jan-22 To: 31-Jan-22	Audit history: Multiple times Controls: Weak Breach risk rating: 6		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Medium</b>	The controls are rated as weak as wattages are not consistently populated, and there are no LED lamp makes and models recorded.  The impact is assessed to be medium as the database does not have LED make and model recorded and the field audit indicates that the data is not accurate.		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
Genesis has advised the Hutt CC of the audit outcome regarding the discrepancy between what is out in field and what has been recorded within the council data base; with the intent that council makes every effort to ensure the exceptions are rectified.	Continuous Improvement	Identified	
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>		
Genesis continues to work with the council to raise database accuracy levels.	Continuous Improvement		

<b>All load recorded in database</b>			
<b>Non-compliance</b>	<b>Description</b>		
Audit Ref: 2.5 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 09-Nov-21 To: 10-Nov-21	Two additional lights found in the field. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>		
<b>Low</b>	The controls are rated as weak as process to track changes is not capturing all changes made in the field.  The impact is assessed to be low as there were only two additional lamps found in the sample checked.		
<b>Actions taken to resolve the issue</b>	<b>Completion date</b>	<b>Remedial action status</b>	
Genesis has advised the Hutt CC of the audit outcome regarding the discrepancy between what is out in field and what has been recorded within the council data base; with the	Continuous Improvement	Identified	

intent that council makes every effort to ensure the exceptions are rectified.		
<b>Preventative actions taken to ensure no further issues will occur</b>	<b>Completion date</b>	
Genesis continues to work with the council to raise database accuracy levels.	Continuous Improvement	

<b>Database accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jan-22 To: 31-Jan-22</p>	<p>The database is not accurate within <math>\pm 5\%</math>. There is a 95% level of confidence that the annual consumption is between 198,000 to 1,117,700 kWh p.a. lower than the database indicates.</p> <p>44 items of load totalling 2,561 W have "Properties UrbanPlus" recorded in the ICP number field and are excluded from submissions.</p> <p>LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.</p> <p>Where more than one light model field was populated, the lamp, gear and total wattage in most cases reflected the values for only one of the recorded light models and in some cases were inconsistent with the expected values for any of the models.</p> <p>Where only one light model field was populated, the recorded lamp and gear wattage did not always reflect the expected wattage.</p> <p>85 items of load do not have information populated in the light model fields. 53 of these had some information populated in the "If Other Light Type Pls Specify" field, and I confirmed that 42 had a wattage consistent with that description. 35 had insufficient information to confirm the correct wattages, and eight had wattages inconsistent with the description.</p> <p>22 poles had a zero-gear wattage when a non-zero value was expected.</p> <p>There is not a clear process to communicate festive light wattages and on and off dates to Genesis. Under submission is expected as festive lights wattages were not included in the January 2022 database extract provided to Genesis.</p> <p>Change dates may not reflect the date the change is made and reflect the latest change for the pole rather than the light where more than one light is connected.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times Controls: Weak Breach risk rating: 9</p>
<b>Audit risk rating</b>	<b>Rationale for audit risk rating</b>
<b>High</b>	<p>The controls over the database are rated as weak as the data quality is poor and incomplete. This is reflected by the field audit results.</p> <p>To reduce the impact of the non-compliance where the database information excluded wattages, Genesis calculated the expected wattage based on the lamp</p>

	<p>model information, and where database extracts were not provided monthly, Genesis used the most recent information available to calculate submissions.</p> <p>The audit risk rating is high based on kWh variances identified.</p>	
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<b>Volume information accuracy</b>	
<b>Non-compliance</b>	<b>Description</b>
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p>	<p>The database is not accurate within <math>\pm 5\%</math>. There is a 95% level of confidence that the annual consumption is between 198,000 to 1,117,700 kWh p.a. lower than the database indicates.</p> <p>Database extracts have not consistently been provided to Genesis monthly, or included wattage information.</p> <p>Some submission volumes for September 2021 and July 2022 were not consistent with the expected values based on the database extract and logger hours.</p> <p>44 items of load totalling 2,561 W have "Properties UrbanPlus" recorded in the ICP number field, and are excluded from submissions.</p> <p>LED light descriptions do not contain lamp make and model so correct wattage cannot be verified.</p> <p>Where more than one light model field was populated, the lamp, gear and total wattage in most cases reflected the values for only one of the recorded light models and in some cases were inconsistent with the expected values for any of the models.</p> <p>Where only one light model field was populated, the recorded lamp and gear wattage did not always reflect the expected wattage.</p> <p>85 items of load do not have information populated in the light model fields. 53 of these had some information populated in the "If Other Light Type Pls Specify" field, and I confirmed that 42 had a wattage consistent with that description. 35 had</p>

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