

## Compliance plan for Napier City Council 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: 01-Jun-21</p> <p>To: 26-Nov-21</p>	<p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>19 of the 25 errors from the May 2021 audit still to be corrected.</p> <p>Errors still present for two of six new roads found in the 2020 audit.</p> <p>Some amenity, right of way and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>44 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 26,600 kWh.</p> <p>In absolute terms, total annual consumption is estimated to be 98,800 kWh lower than the DUML database indicates.</p> <p>Database reporting is a monthly snapshot and does not record historic changes.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact is assessed to high due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue		Completion date
Remedial action status		

<p>Genesis are still in the process of reviewing whether to be none compliant by continuing to use the NST profile for submission as all other profiles will result in the same outcome, or bill/settle full nights and be non-compliant for over submission.</p> <p>Genesis has advised the council 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>In reference to the new connection process within the Napier region, Genesis will look to review this process with the council with the aim that new roads are been added within a timely manner.</p>	<p>Continuous Improvement</p>	<p>Investigating</p>
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p>The half night assets require a check meter or become a metered installation to cater for the half night compliance issue.</p> <p>Regarding newly created roading within the Napier region, Genesis will work with the council to review their process with the intent that new roads are being added within a timely manner.</p>	<p>Continuous Improvement</p>	

ICP identifier and items 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: 01-Oct-18</p> <p>To: 26-Nov-21</p>	<p>ICP identifiers in the database are not correct.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	<p>The controls are rated as weak because the design of the database does not ensure ICP identifiers are correct.</p> <p>The audit risk rating is low because the total kWh is correct and there is only one relevant GXP.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed the auditor's findings with the council regarding the private lights that have been recorded to show that the ICP as being with NCC. As the council has these assets listed as private lighting genesis has passed this information on to the distributor for further investigation into ownership of these assets.	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Councils in general will have NZTA/Private lights in their databases in the event the public complain to the council they don't work.</p> <p>Where the private lights need to be addressed is at a distributor level to ensure that these lights, if not under Council ownership are assigned to the correct site/sites depend if SUML or UML.</p>	Continuous Improvement	

All load recorded in database			
Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 27-Feb-18</p> <p>To: 26-Nov-21</p>	<p>Errors still present for two of six new roads found in the 2020 audit resulting in six items of load identified still not recorded in the database.</p> <p>13 additional lights found in the field.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Twice</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Low</b>	<p>The controls are recorded as weak because they do not mitigate risk to an acceptable level and some of the discrepancies have been present for some years.</p> <p>The impact is assessed to be low based on number of additional lights found in the field in comparison to the overall number of lights checked.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis has advised the council 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>In reference to the new connection process within the Napier region, Genesis will look to review this process with the council with the aim that new roads are been added within a timely manner.</p>		Continuous Improvement	Investigating
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: 01-Jun-21</p> <p>To: 26-Nov-21</p>	<p>In absolute terms, total annual consumption is estimated to be 98,800 kWh lower than the DUML database indicates.</p> <p>Some database discrepancies identified in the 2020 audit still to be corrected.</p> <p>Incorrect ICP identifiers because they are against the pole not the light.</p> <p>Some amenity, right of way and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>30 items of load with the incorrect ballast recorded resulting in a very minor estimated under submission of 8.5 kWh.</p> <p>45 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 26,600 kWh.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact on settlement and participants is high because over submission will be occurring; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has advised the council of the audit findings where database discrepancies has been identified with the intent that council makes every effort to ensure the exceptions are rectified.</p> <p>Genesis has again raised the concerns with council around how private lighting has been recorded within their database. As the council has these assets listed as private lighting genesis has passed this information on to the distributor for further investigation into the ownership of these assets.</p>	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>Genesis continues to work with the council to mitigate the risk surrounding +- settlement submissions. Councils in general will have NZTA/Private lights in their databases in the event the public complain to the council they don't work.</p> <p>Where the private lights need to be addressed is at a distributor level to ensure that these lights, if not under Council ownership are assigned to the correct site/sites depend if SUML or UML.</p>	<p>Continuous Improvement</p>	
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Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Jun-21 To: 26-Nov-21</p>	<p>NST profile used for ICPs 0000939921HBE61 and 0000939923HBEE4 which are turned off at midnight.</p> <p>19 of the 25 errors from the May 2021 audit still to be corrected.</p> <p>Errors still present for two of six new roads found in the 2020 audit.</p> <p>Some amenity, right of way and car park lights are incorrectly recorded as connected to the NCC unmetered streetlight ICPs.</p> <p>44 private lights recorded against NCC ICPs excluded from submission resulting in an estimated under submission of 26,600 kWh.</p> <p>In absolute terms, total annual consumption is estimated to be 98,800 kWh lower than the DUML database indicates.</p> <p>Database reporting is a monthly snapshot and does not record historic changes.</p> <p>Potential impact: High Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<p><b>High</b></p>	<p>The controls are rated as weak as the field findings indicate that the database management processes have weakened further during the audit period and I have recommended that the change management process is reviewed.</p> <p>The impact is assessed to high due to the potential impact on settlement accuracy.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status

<p>Genesis has advised the council of the audit findings where database discrepancies has been identified with the intent that council makes every effort to ensure the exceptions are rectified.</p> <p>Genesis has also re-raised the concerns surrounding how private lighting has been recorded within the council database. Genesis has advised the distributor of these private lights so that further investigation can be conducted into who own's these assets.</p> <p>Genesis are still in the process of reviewing whether to be none compliant by continuing to use the NST profile for submission as all other profiles will result in the same outcome, or bill/settle full nights and be non-compliant for over submission.</p> <p>In reference to the new connection process within the Napier region, Genesis will look to review this process with the council with the aim that new roads are been added within a timely manner.</p>	<p>Continuous Improvement</p>	<p>Investigating</p>
<p><b>Preventative actions taken to ensure no further issues will occur</b></p>	<p><b>Completion date</b></p>	
<p>Genesis continues to work with the council to mitigate the risk surrounding +/- settlement submissions.</p> <p>Regarding newly created roading within the Napier region, Genesis will work with the council to review their process with the intent that new roads are being added within a timely manner.</p> <p>With regards to half night assets, Genesis requires a check meter to be installed in order to validate burn hours or become for these assets to become a metered installation to cater for the half night compliance issue.</p>	<p>Continuous Improvement</p>	