

Compliance plan for Waka Kotahi Greater Wellington GENE DUML January 2022

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.9 With: Clause 16A.26 From: 01-Jan-22 To: 22-Jun-22	Audit not completed by the due date. Potential impact: None Actual impact: Low Audit history: Once previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak as Genesis are in the process of a staff change resulting in there being insufficient resource to manage these. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has now filled the position of a DUML Data & Stakeholder Lead and therefore in future audits will be conducted in a timely manner.	25/07/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 20-Feb-20 To: 31-Jan-22</p>	<p>Over submission of 8,479.90 kWh for the month of December 2021 due to no wattage report being received.</p> <p>65 items of load on SH58 missing from the NZTA database report provided to Genesis for submission resulting in an estimated under submission of 54,712 kWh per annum.</p> <p>In absolute terms, total annual consumption is estimated to be 29,500 kWh higher than the DUML database indicates.</p> <p>The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 46,900 kWh p.a. lower to 115,100 kWh p.a. higher than the database indicates.</p> <p>51 items of load with no ICP recorded resulting in a possible under submission of 27,680 kWh per annum.</p> <p>30 items of load with a blank or unknown lamp model and no lamp wattage or ballast wattage recorded resulting in an estimated under submission of 19,988 kWh per annum.</p> <p>171 items of load with the incorrect ballast assigned resulting in an estimated under submission of 35,389 per annum.</p> <p>Some LED lights recorded in the database at the maximum wattage but are burning at a lower wattage resulting in some over submission.</p> <p>Database reporting is a monthly snapshot and does not record historic changes.</p> <p>Potential impact: High Actual impact: High Audit history: Once previously Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as weak because the database accuracy indicates the current processes in place do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is high based on the cumulative kWh error; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has been in contact with NZTA Wellington regarding providing monthly data extract to meet the accuracy and tracking of changes.</p> <p>Genesis has advised NZTA Wellington of the audit findings with regard to the discrepancy found between the field audit and the RAMM data base with the intent that NZTA will ensure all corrections are made within a timely manner.</p>	Continuous improvement	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
Genesis continues to work with NZTA in order to improve accuracy within the NZTA RAMM data base.	

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: 20-Feb-20 To: 31-Jan-22	51 items of load with no ICP recorded resulting in a possible under submission of 27,680 kWh per annum. Potential impact: Medium Actual impact: Medium Audit history: Once previously Controls: Weak Breach risk rating: 6	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are recorded as weak as discrepancies such as this are not being checked for and therefore not corrected. The audit risk rating is medium based on the estimated kWh impact on submission.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has advised NZTA Wellington of the audit findings with regards to the discrepancy found within RAMM data base with the intent that NZTA will ensure all corrections are made within a timely manner.	Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with NZTA to improve accuracy within the NZTA RAMM data base.	Continuous improvement	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 20-Feb-20</p> <p>To: 31-Jan-22</p>	<p>30 items of load with a blank or unknown lamp model and no lamp wattage or ballast wattage recorded resulting in an estimated under submission of 19,988 kWh per annum.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are recorded as weak as discrepancies such as this are not being checked for and therefore not corrected.</p> <p>The impact is assessed to be low based on the kWh impact.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has advised NZTA Wellington of the audit findings with regards to the discrepancy found within RAMM data base with the intent that NZTA will ensure all corrections are made within a timely manner.	Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with NZTA to improve accuracy within the NZTA RAMM data base.	Continuous improvement	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 20-Feb-20</p> <p>To: 31-Jan-22</p>	<p>In absolute terms, total annual consumption is estimated to be 29,500 kWh higher than the DUMML database indicates.</p> <p>The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 46,900 kWh p.a. lower to 115,100 kWh p.a. higher than the database indicates.</p> <p>30 items of load with a blank or unknown lamp model and no lamp wattage or ballast wattage recorded resulting in an estimated under submission of 19,988 kWh per annum.</p> <p>171 items of load with the incorrect ballast assigned resulting in an estimated under submission of 35,389 per annum.</p> <p>Some LED lights recorded in the database at the maximum wattage but are burning at a lower wattage resulting in some over submission.</p> <p>51 items of load with no ICP recorded resulting in a possible under submission of 27,680 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as weak because the database accuracy indicates the current processes in place do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is high based on the cumulative kWh error; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has advised NZTA Wellington of the audit findings with regards to the discrepancy found within RAMM data base with the intent that NZTA will ensure all corrections are made within a timely manner.	Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with NZTA to improve accuracy within the NZTA RAMM data base.	Continuous improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 20-Feb-20</p> <p>To: 31-Jan-22</p>	<p>Over submission of 8,479.90 kWh for the month of December 2021 due to no wattage report being received.</p> <p>65 items of load on SH58 missing from the NZTA database report provided to Genesis for submission resulting in an estimated under submission of 54,712 kWh per annum.</p> <p>In absolute terms, total annual consumption is estimated to be 29,500 kWh higher than the DUML database indicates.</p> <p>The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 46,900 kWh p.a. lower to 115,100 kWh p.a. higher than the database indicates.</p> <p>51 items of load with no ICP recorded resulting in a possible under submission of 27,680 kWh per annum.</p> <p>30 items of load with a blank of unknown lamp model and no lamp wattage or ballast wattage recorded resulting in an estimated under submission of 19,988 kWh per annum.</p> <p>171 items of load with the incorrect ballast assigned resulting in an estimated under submission of 35,389 per annum.</p> <p>Some LED lights recorded in the database at the maximum wattage but are burning at a lower wattage resulting in some over submission.</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: Once 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 recorded as weak because the database accuracy indicates the current processes in place do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is high based on the cumulative kWh error; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has been in contact with NZTA Wellington regarding providing monthly data extract to meet the accuracy and tracking of changes.</p> <p>Genesis has advised NZTA Wellington of the audit findings with regard to the discrepancy found between the field audit and the RAMM data base with the intent that NZTA will ensure all corrections are made within a timely manner.</p>	Continuous improvement	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with NZTA to improve accuracy within the NZTA RAMM data base.		