Compliance plan for NZTA Lower North Island – 15/10/2021

Distributed unmetered load audits				
Non-compliance	Description			
Audit Ref: 1.9	Audit conducted late.			
With: Clause 16A.26	Potential impact: None			
and 17.295F	Actual impact: None			
	Audit history: None			
From: 01-Sep-21	Controls: Strong			
To: 03-Oct-21	Breach risk rating: 1			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are recorded as strong because the audit was planned but had to be delayed due to COVID-19 travel restrictions.			
	The impact on settlement and participating is low.	pants is minor; the	erefore, the audit risk	
Actions taken to resolve the issue		Completion date	Remedial action status	
Genesis has been engaged with NZTA for some time as their program of work progressed to remove nzta assets from council ownership.		Proposed or actual date	Cleared	
Preventative actions taken to ensure no further issues will occur		Completion date		

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 249,800 kWh p.a. lower to 220,400 kWh p.a. higher than the database indicates.		
Schedule 13.3	In absolute terms, total annual consumption is estimated to be 35,300 kWh lower than the DUML database indicates.		
	ICPs 0001113593WM404 & 0001113594WM9CE had the "night hours" from the profile used for submission for June 2021 instead of the data logger hours.		
	Incorrect gear wattage for 13 items of load.		
From: 01-Jun-21	Potential impact: High		
To: 03-Oct-21	Actual impact: Medium		
	Audit history: None		
	Controls: Weak		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as weak because the database requires a 100% field audit in order to ensure accuracy.		
	The impact on settlement and participants is moderate based on the kWh error; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA have rolled out a program of work to create a national database of assets. The database will be maintained by regions. The mid-lower north island has been the focus of the initial program but will be extending to other regions. The NZTA has advised that there is a desire to replace the assets with LED and that the cost to execute a full field audit will delay any potential LED roll out, therefore no field audit will be conducted.		Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will continue to work alongside the NZTA contractor to raise the accuracy level of the newly formed database. Genesis has corrected the profiling from the legacy night hours to its appropriate streetlighting profile, and revise settlement processes.		Continuous improvement	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	99 items of load have a blank or unknown light model description.		
With: Clause 11(2)(c)	Two items of load have zero recorded in the lamp wattage field.		
and (d) of Schedule 15.3	13 items of load have incorrect gear wattages.		
	Potential impact: Medium		
From: 01-Jun-21	Actual impact: Low		
To: 03-Oct-21	Audit history: None		
	Controls: Weak		
	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak because the database requires a 100% field audit in order to ensure accuracy.		
	The impact is assessed to be low based on the kWh impact.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA has agreed to populate this information and will advise Genesis when this has been completed		01/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NZTA has created the database and will actively populate any missing information as they become aware of it. Genesis continues to review duml datasets to provide exception management reporting back to the customer.		Continuous improvements	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3	17 items of load in the field not recorded in the database, resulting in annual under submission of 9,174 kWh per annum. This discrepancy is included in the total field audit discrepancy recorded in section 3.1 .		
From: 01-Jun-21 To: 03-Oct-21	Potential impact: Medium Actual impact: Low Audit history: None		
10.03-001-21	Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak because the database requires a 100% field audit in order to ensure accuracy.		
	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
NZTA has agreed to populate this information and will advise Genesis when this has been completed.		01/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NZTA has created the database and will actively populate any missing information as they become aware of it. Genesis continues to review duml datasets to provide exception management reporting back to the customer.		Continuous improvements	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	The database is outside of the allowable +/-5% threshold. There is a 95% leve of confidence that the annual consumption is between 249,800 kWh p.a. lower to 220,400 kWh p.a. higher than the database indicates.		
15.575(8)	In absolute terms, total annual consur lower than the DUML database indica	-	ed to be 35,300 kWh
From: 01-Jun-21	Database discrepancies are as follows:		
To: 03-Oct-21	13 incorrect gear wattages,		
	657 incorrect light model descript	tions,	
	17 items of load in the field not in	the database,	
	13 items of load in the database but not in the field, and		
	125 incorrect wattages.		
	Potential impact: High		
	Actual impact: Medium		
	Audit history: None		
	Controls: Weak		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as weak because the database requires a 100% field audit in order to ensure accuracy. The impact on settlement and participants is moderate based on the kWh error therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA has agreed to populate this information and will advise Genesis when this has been completed.		Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NZTA has created the database and will actively populate any missing information as they become aware of it. Genesis continues to review duml datasets to provide exception management reporting back to the customer.		Continuous improvement	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	The database is outside of the allowable +/-5% threshold. There is a 95% level of confidence that the annual consumption is between 249,800 kWh p.a. lower to 220,400 kWh p.a. higher than the database indicates. In absolute terms, total annual consumption is estimated to be 35,300 kWh lower than the DUML database indicates.		
	ICPs 0001113593WM404 & 0001113594WM9CE had the "night hours" from the profile used for submission for June 2021 instead of the data logger hours		
From: 01-Jun-21	Incorrect gear wattage for 13 items of load.		
To: 03-Oct-21	Potential impact: High		
	Actual impact: Medium		
	Audit history: None		
	Controls: Weak		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as weak because the database requires a 100% field audit in order to ensure accuracy.		
	The impact on settlement and participants is moderate based on the kWh error; therefore, the audit risk rating is medium.		
Actions taken to resolve the issue		Completion date	Remedial action status
NZTA has agreed to populate this information and will advise Genesis when this has been completed.		01/12/2021	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
NZTA has created the database and will actively populate any missing information as they become aware of it. Genesis continues to review duml datasets to provide exception management reporting back to the customer.		Continuous improvements	