## Compliance Plan for NZTA Northland DUML OCT 2022

| Distributed unmetered load audits   |   |                 |                        |
|---|---|-----------------|------------------------|
| Non-compliance  | Description   |                 |                        |
| Audit Ref: 1.10<br>Clause 17.295F of part   | Audit not completed within the required timeframe.  |                 |                        |
| 17  | Potential impact: Low   |                 |                        |
|   | Actual impact: Low  |                 |                        |
|   | Audit history: Three times  |                 |                        |
| From: 15-Apr-22   | Controls: Strong  |                 |                        |
| To: 26-Sep-22   | Breach risk rating: 1   |                 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |
| Low   | The controls are rated as strong, as Genesis are reliant on the database provider to supply the data and in this case the delay caused this report to be late.  The impact is assessed to be low, as this has no direct impact on reconciliation. |                 |                        |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |
| Genesis has appointed a Data and Stakeholder Lead to have the audits performed in a timely manner and brought upto speed. |   | 21/10/2022      | Cleared                |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date |                        |
| Genesis has appointed a Data and Stakeholder Lead to have the audits performed in a timely manner and brought upto speed. |   | 21/10/2022      |                        |

| Deriving submission information   |   |                 |                        |
|---|---|-----------------|------------------------|
| Non-compliance  | Description   |                 |                        |
| Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3  | Database is not confirmed as accurate with a 95% level of confidence as recorded in <b>section 3.1</b> .  The data used for submission does not track changes at a daily basis and is provided as a snapshot. |                 |                        |
|   | Potential impact: High  |                 |                        |
|   | Actual impact: High   |                 |                        |
|   | Audit history: Multiple times   |                 |                        |
| From: unknown   | Controls: Weak  |                 |                        |
| To: 16-Sep-22   | Breach risk rating: 9   |                 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |
| High  | Controls are rated as weak as the database has a high level of inaccuracy indicating controls are weak.   |                 |                        |
|   | The impact is assessed to be high due to the kWh volumes.   |                 |                        |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |
| Genesis has brought this to the Relationship Managers attention and work with NZTA to have the database updated and maintained. |   | 01/01/2023      | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date |                        |
| NZTA will be notified of the auditor's findings. Genesis relies on NZTA to accurately maintain its database.                    |   | 01/01/2023      |                        |

| All load recorded in database   |   |                 |                        |
|---|---|-----------------|------------------------|
| Non-compliance  | Description   |                 |                        |
| Audit Ref: 2.5  | Nine additional lights were found in the field.   |                 |                        |
| With: Clause 11(2A) of  | Potential impact: High  |                 |                        |
| Schedule 15.3   | Actual impact: Low  |                 |                        |
|   | Audit history: Once   |                 |                        |
| From: unknown   | Controls: Weak  |                 |                        |
| To: 16-Sep-22   | Breach risk rating: 3   |                 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |
| Low   | The controls are rated as weak as the database has not been updated to reflect the field information.  The impact is assessed to be low due to the kWh volumes. |                 |                        |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |
| Genesis has brought this to the Relationship Managers attention and work with NZTA to have the database updated and maintained. |   | 01/01/2023      | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date |                        |
| NZTA will be notified of the auditor's findings. Genesis relies on NZTA to accurately maintain its database.                    |   | 01/01/2023      |                        |

| Database accuracy   |   |                  |                        |
|---|---|------------------|------------------------|
| Non-compliance  | Description   |                  |                        |
| Audit Ref: 3.1  | Database is not confirmed as accurate with a 95% level of confidence.                                 |                  |                        |
| With: Clause 15.2 and 15.37B(b)   | Potential impact: High  |                  |                        |
|   | Actual impact: High   |                  |                        |
|   | Audit history: Multiple times   |                  |                        |
| From: unknown   | Controls: Weak  |                  |                        |
| To: 16-Sep-22   | Breach risk rating: 9   |                  |                        |
| Audit risk rating   | Rationale for audit risk rating   |                  |                        |
| High  | The controls are rated as weak as the database has not been updated to reflect the field information. |                  |                        |
|   | The impact is assessed to be high due   | to the kWh volun | nes.                   |
| Actions taken to resolve the issue  |   | Completion date  | Remedial action status |
| Genesis has brought this to the Relationship Managers attention and work with NZTA to have the database updated and maintained. |   | 01/01/2023       | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date  |                        |
| NZTA will be notified of the auditor's findings. Genesis relies on NZTA to accurately maintain its database.                    |   | 01/01/2023       |                        |

| Volume information accuracy   |   |                 |                        |
|---|---|-----------------|------------------------|
| Non-compliance  | Description   |                 |                        |
| Audit Ref: 3.2<br>With: Clause 15.2 and<br>15.37B(c)  | Database is not confirmed as accurate with a 95% level of confidence as recorded in section 3.1.  The data used for submission does not track changes at a daily basis and is provided as a snapshot.                           |                 |                        |
| From: unknown<br>To: 31-Jul-20  | Potential impact: High  Actual impact: High  Audit history: Multiple times  |                 |                        |
|   | Controls: Weak  Breach risk rating: 9   |                 |                        |
| Audit risk rating   | Rationale for audit risk rating   |                 |                        |
| High  | Controls are rated as weak as the database has a high level of inaccuracy indicating controls are weak, and there are no processes to update changes from the field.  The impact is assessed to be high due to the kWh volumes. |                 |                        |
| Actions taken to resolve the issue  |   | Completion date | Remedial action status |
| Genesis has brought this to the Relationship Managers attention and work with NZTA to have the database updated and maintained. |   | 01/01/2023      | Investigating          |
| Preventative actions taken to ensure no further issues will occur   |   | Completion date |                        |
| NZTA will be notified of the auditor's findings. Genesis relies on NZTA to accurately maintain its database.                    |   | 01/01/2023      |                        |