

Compliance plan for GENE NZTA Waikato DUML June 2022

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 Clause 16A.26 Waikato From: 12-Mar-21 To: 22-Jun-22	Audit not completed within the required timeframe. Potential impact: Low 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 the DUML audit process at this time. 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 is currently in the process of reviewing the NZTA Waikato data base to ascertain data base accuracy levels, with the intent to update database exceptions by the 01/08/2022.	1/08/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis and NZTA Waikato agree to review RAMM database on a monthly basis to mitigate risk associated with asset database misalignment. Initial review completed with updates expected to be completed by the 01/08/2022.	01/08/2022	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) & (d) of Schedule 15.3 From: 02-Dec-19 To: 30-Apr-22	30 items of load with no lamp description. One item of load with no wattage recorded. Potential impact: Low 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 the controls in place do not mitigate risk to an acceptable level. The impact is assessed to be low as number of items affected is very small.	
Actions taken to resolve the issue		Completion date
Genesis and NZTA Waikato agree to review RAMM database on a monthly basis to mitigate risk associated with asset database misalignment.		01/10/2022
Preventative actions taken to ensure no further issues will occur		Completion date
Genesis will advise NZTA Waikato of any exceptions where the monthly review has identified any anomaly.		01/10/2022
Identified		

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 04-Nov-19 To: 01-Apr-22	31 additional items of load found in the field of a sample of 325 (10% error rate). Potential impact: High Actual impact: High Audit history: Once previously Controls: Weak Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak as the despite the processes in place having quality checks, the level of error indicates that this is not ensuring data is entered correctly. The impact is assessed to be high, as the volume of additional lights found in the field audit indicate a potential large under submission to the market.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis and NZTA Waikato agree to review RAMM database on a monthly basis to mitigate risk associated with asset database misalignment.		01/10/2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis will advise NZTA Waikato of any exceptions where the monthly review has identified any anomaly.		01/10/2022	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 02-Dec-19</p> <p>To: 30-Apr-22</p>	<p>Database is not confirmed as accurate with a 95% level of confidence resulting in an estimated under submission of 150,200 kWh per annum.</p> <p>30 items of load with no lamp description.</p> <p>One item of load with no wattage recorded.</p> <p>Ten items of load with an invalid lamp description.</p> <p>295 items of load with the incorrect ballast applied resulting an estimated over submission of 1,627 kWh per annum.</p> <p>ICP 0000026694WE641incorrectly recorded as reconciled elsewhere resulting in an estimated under submission of 3,255 kWh per month since February 2022.</p> <p>An unknown number of items of load allocated to the incorrect ICP and therefore the incorrect NSP and possibly balancing area and network including an estimated 22 NZTA lights or 19,540 kWh per annum reconciled to the Lines Company network instead of the Waipa network.</p> <p>Duplicated submission with five local council databases resulting in an estimated over submission of 733,494 kWh per annum.</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 changes made in the field are not always being made accurately and I recommend that this process is reviewed.</p> <p>The impact is assessed to be high due to the estimated kWh impact to the market and the database accuracy issues raised above. .</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has completed the review of NZTA Waikato assets pertaining to MPDC and HDC with the reallocation of asset to the correct ICP/ NSP completed.</p> <p>Genesis is currently working with ODC and TDC to ascertain asset reallocation with the intent to be conclude by the 01/10/2022. Revision for submissions will be historically corrected as per revision schedule.</p>	01/10/2022	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis and NZTA Waikato agree to review RAMM database on a monthly basis to mitigate risk associated with asset database misalignment.	01/10/2022	

Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis' review of the NZTA Waikato data set has revealed anomalies across the majority of asset allocation which Genesis has provided NZTA Waikato with the exception list with the intent to have updates completed by the 01/08/2022.</p> <p>In relation to Logger allocation Genesis has been provided by EMS the correct logger for each NSP which will be used for revision purposes.</p> <p>In relation ICP 0000026694WE641, incorrectly recorded as "reconciled elsewhere" incorrect as the assets have been reconciled against ICP 0000022579WE623 instead of ICP 0000026694WE641. Therefore, the issue is asset allocation rather than under submission. This will also be addressed in the list of exception provided to NZTA Waikato.</p>	1/10/2022	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Continuation of NZTA Waikato monthly database extraction will provided exception to be reviewed by NZTA.	01/10/2022	