

Compliance plan for Otorohonga DC DUML 2022

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 12-Nov-20 To: 05-May-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual under submission of 10,400 kWh.</p> <p>NZTA lights being submitted by both ODC and NZTA resulting in 104,930 kWh of over submission.</p> <p>An estimated 22 NZTA lights or 19,540 kWh per annum reconciled to the Lines Company network instead of the Waipa network.</p> <p>Festive lights are included throughout the year resulting in an estimated annual over submission of 812 kWh.</p> <p>Some decorative and festive lights are not recorded in the database.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</p> <p>Potential impact: High Actual impact: High Audit history: Twice previously Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the controls in place to manage the deriving of submission should have identified the duplication of load being submitted.</p> <p>The impact is assessed to be high based on the kWh impact to the market.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has completed a review of the NZTA Waikato data base and are now currently in the process of comparing this to ODC. Once this comparison has been completed genesis will look to revise the submissions.</p> <p>Genesis will investigate the over submission of the festive lights and confirm with ODC the on and off times with the intent to reconceal this consumption going back 14mths</p> <p>Genesis has advised the ODC of the importance of tracking of change and will work with ODC to improve this process.</p>	<p>01/09/2022</p> <p>Continuous improvement</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with the council to raise database accuracy levels.	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: 12-Nov-20</p> <p>To: 05-May-22</p>	<p>Pole ID 741 with no lamp make, model or wattage recorded.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: None</p> <p>Controls: Strong</p> <p>Breach risk rating: 1</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as strong overall as they will mitigate risk to an acceptable level.</p> <p>The impact is assessed to be low, as the amount of under submission caused by one light is very minor.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed the audit findings with the ODC with the intent that council makes every effort to ensure the exceptions are rectified.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with the council to raise database accuracy levels.	Continuous improvement	

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: unknown To: 05-May-22	Three additional items of load found in the field. Some decorative and festive lights are not recorded in the database. Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as weak overall as the controls in place are not robust enough to ensure that all load is recorded in the database. The impact is assessed to be low, as the kWh impact on reconciliation is expected to be small.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed the audit findings with the ODC with the intent that council makes every effort to ensure the exceptions are rectified.	Continuous improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with the council to raise database accuracy levels.	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: 12-Nov-20</p> <p>To: 05-May-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual under submission of 10,400 kWh.</p> <p>NZTA lights being submitted by both ODC and NZTA resulting in 104,930 kWh of over submission.</p> <p>An estimated 22 NZTA lights or 19,540 kWh per annum reconciled to the Lines Company network instead of the Waipa network.</p> <p>Pole ID 741 with no lamp make, model or wattage recorded.</p> <p>Festive lights are included throughout the year resulting in an estimated annual over submission of 812 kWh.</p> <p>Some decorative and festive lights are not recorded in the database.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Controls are rated as weak as the processes in place do not sufficiently mitigate risk and the recommendations made in the last audit have not been adopted.</p> <p>The impact is assessed to be high based on the kWh impact to the market.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has completed a review of the NZTA Waikato data base and are now currently in the process of comparing this to ODC. Once this comparison has been completed genesis will look to revise the submissions.</p> <p>Genesis will investigate the over submission of the festive lights and confirm with ODC the on and off times with the intent to reconceal this consumption going back 14mths</p>	<p>01/09/2022</p> <p>Continuous improvement</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis continues to work with the council to raise database accuracy levels.</p>	<p>Continuous improvement</p>	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 12-Nov-20</p> <p>To: 05-May-22</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual under submission of 10,400 kWh.</p> <p>NZTA lights being submitted by both ODC and NZTA resulting in 104,930 kWh of over submission.</p> <p>An estimated 22 NZTA lights or 19,540 kWh per annum reconciled to the Lines Company network instead of the Waipa network.</p> <p>Festive lights are included throughout the year resulting in an estimated annual over submission of 812 kWh.</p> <p>Some decorative and festive lights are not recorded in the database.</p> <p>Submission is based on a snapshot and does not consider historic adjustments.</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 controls in place to manage the deriving of submission should have identified the duplication of load being submitted.</p> <p>The impact is assessed to be high based on the kWh impact to the market.</p>	
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<p>Genesis has completed a review of the NZTA Waikato data base and are now currently in the process of comparing this to ODC. Once this comparison has been completed genesis will look to revise the submissions.</p> <p>Genesis will investigate the over submission of the festive lights and confirm with ODC the on and off times with the intent to reconceal this consumption going back 14mths</p> <p>Genesis has advised the ODC of the importance of tracking of change and will work with ODC to improve this process.</p>	<p>01/09/2022</p> <p>Continuous improvement</p>	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with the council to raise database accuracy levels.	Continuous improvement	