## Compliance plan for Wellington CC DUML August 2021

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	<ul> <li>The database used to prepare submissions contains some inaccurate information:</li> <li>109,200 kWh per annum over submission from field audit,</li> <li>18,572 per annum under submission due to incorrect lamp or gear wattages,</li> <li>2,776 kWh per annum under submission due to missing lamp or gear wattages,</li> <li>8,862 kWh per annum under submission due to static dimming applied to incorrect lamp types, and</li> </ul>		
	<ul> <li>65 Christmas lights do not have IO</li> <li>Potential impact: High</li> </ul>	CP numbers recor	ded.
From: 01-Mar-21	Actual impact: High		
To: 17-Aug-21	Audit history: Three times		
	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in <b>section 3.1</b> .		
	The impact is assessed to be high, bas above.	ed on the kWh di	fferences described
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Genesis are working on improving settlement compliance, with the intent to initiate profile applications once the supporting data has been obtained. Genesis are to continue utilising the customers database extractions whilst we continue to work through both LED and non-LED asset processes/validation for the Wellington City Council. It has been iterated by the Council that it does not intend to complete a field audit.		Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will Completion date			

Genesis are aware that there are many field discrepancies, however the council have iterated they will not be doing a completed field audit and can only report energy volumes that have been calculated off the customers datasets provided. Where exceptions have been found and corrected, the historic volumes are corrected through the revision process.	Continuous improvement	
Genesis will be looking into the decorative lighting and the assets icp allocation, although the NSP's in this area, are all within the same balancing area.		

ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2	ICP number is not recorded for 65 Chr	ristmas lights.	
With: Clause 11(2)(a)	Potential impact: Low		
and (aa) of Schedule 15.3	Actual impact: Low		
From: unknown	Audit history: Three times		
To: 17-Aug-21	Controls: Strong		
	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as strong as the bulk of the lights have an ICP assigned and are recorded against the correct ICP.		
	The impact is low/ none as this volume has been submitted and the number of lights potentially assigned to the incorrect ICP are minor.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis will be looking into the decorative lighting and the assets icp allocation, although the NSP's in this area, are all within the same balancing area.		Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis to action new ICP/s for the Christmas light NSP allocation			

Location of each item of load			
Non-compliance	Description		
Audit Ref: 2.3	62 items of load do not have GPS coordinates or street numbers		
With: Clause 11(2)(b)	Potential impact: Low		
of Schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 01-Mar-21	Controls: Moderate		
To: 17-Aug-21	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.		
	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 continues to provide exception reporting to enable the customer to manage database discrepancies		Continuous improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
A field audit would identify all database discrepancies, but the council has iterated it does not plan to conduct a complete field audit.			

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	Some description and capacity information is incomplete or unknown, including:		
With: Clauses 11(2)(c) and (d) of Schedule 15.3	<ul> <li>131 lamps with unknown or blank lamp descriptions,</li> <li>13 items of load with zero wattage recorded, and</li> <li>13 blank gear wattages.</li> </ul>		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Three times		
From: unknown	Controls: Moderate		
To: 17-Aug-21	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, as they are sufficient to ensure that almost all items of load have wattage and description information recorded.		
The impact is estimated to be low, based on the information available.			ation available.
Actions taken to resolve the issue		Completion date	Remedial action status
issues within the database continue to have it and rehave not been able to condatabase. This is a reitera continues to struggle to completeness. These exceptions are incompleteness.	nd discussed the continuation of se. The council has iterated that they esource constraints meaning they implete the corrections in their ation of the last audit and the council meet the requirements for teptional are known to the council of been able to populate the details	unknown	Unknown
Preventative actions to	aken to ensure no further issues will occur	Completion date	

unknown

Genesis continues to review the data and raises any

exceptions with the council where identified.

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5	Nine additional items of load found in the March 2021 field audit.		
With: Clauses 11(2A) of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
5	Audit history: Twice		
From: 01-Mar-20	Controls: Moderate		
To: 17-Aug-21	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	Controls are rated as moderate, as they are sufficient to ensure that the majority of items of load are recorded in the database.  The impact is estimated to be low, based on the information available.		
Actions ta	Actions taken to resolve the issue Completion Remedial action statu		
Genesis will request the inclusion of the assets into the database, the completion date of this is unknown as the council cannot advise when this would be completed.		Unknown	Unknown
Preventative actions taken to ensure no further issues will occur		Completion date	
database as it's just not p	onitor assets that are missing from the cossible, a field audit would locate any the council will not be completing a	unknown	

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	The database accuracy is assessed to be 97.3% of the database for the sample checked indicating a potential over submission of approximately 109,200 kWh per annum.		
13.378(8)	262 items of load have lamp and/or gear wattages recorded which differed from the published standardised wattage table and manufacturer's specifications available. The impact of these differences is estimated to be approximately 18,572 kWh of under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).		
	13 items of load have incorrect wattagkWh per annum.	ges, leading to un	der submission by 2,776
	Dynamic dimming is sometimes used, and the full lamp wattage is recorded in RAMM for the dynamically dimmed lights. The impact varies but is expected to be low.		
	Static dimming was not correctly applied for 49 HPS lamps. The impact is expected to be at least approximately 8,862 kWh under submission (based on annual burn hours of 4,271 as detailed in the DUML database auditing tool).		
	65 Christmas lights do not have ICP numbers recorded.		
	Potential impact: High		
	Actual impact: High		
	Audit history: Three times		
From: unknown	Controls: Weak		
To: 26-Feb-21	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are rated as weak, because they are not sufficient to ensure that database wattage is consistently accurate.		
	The impact is assessed to be high based on the wattage differences described above.		
Actions taken to resolve the issue Completion date			Remedial action status
Genesis will be engaging with the council to enabling Genesis unknown to administer a new ICP for billing and settlement of these assets. Genesis will continue engaging with the Council to establish compliance improvements.		Investigating	
Preventative actions taken to ensure no further issues will completion date			

Continue to work with the council to manage database discrepancies	unknown	
<ul> <li>Introduce a new ICP to cater for locations of decorative Christmas lighting</li> </ul>		
<ul> <li>Continue to manage the dimming of asset that are non-led</li> </ul>		
<ul> <li>Continue to provide exception reporting to the council on the identified gear/lamp wattage and description anomalies</li> </ul>		

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	The database used to prepare submissions contains some inaccurate information:  • 109,200 kWh per annum over submission from field audit,		
	<ul> <li>18,572 per annum under submission due to incorrect lamp or gear wattages,</li> <li>2,776 kWh per annum under submission due to missing lamp or gear wattages,</li> <li>8,862 kWh per annum under submission due to static dimming applied to incorrect lamp types, and</li> </ul>		
	<ul> <li>65 Christmas lights do not have IO</li> <li>Potential impact: High</li> </ul>	LP numbers recor	aea.
From: 01-Mar-21	Actual impact: High		
To: 17-Aug-21	Audit history: Three times		
10. 17-Aug-21	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in <b>section 3.1</b> .		o the database accuracy
	The impact is assessed to be high, based on the kWh differences described above.		
Actions taken to resolve the issue Completion date			Remedial action status
Genesis are working on improving settlement compliance, with the intent to initiate profile applications once the supporting data has been obtained. Genesis will continue to engage the council in investing in database accuracy to mitigate the compliance risk and the frequency of audits.		unknown	Investigating
Preventative actions taken to ensure no further issues will Completion date			

Genesis has been unable to gain access to PLANet to date to review asset information. Genesis are aware that there are many field discrepancies, however the council have iterated they will not be doing a completed field audit.	unknown	
Genesis will be looking into the decorative lighting and the assets icp allocation, although the NSP's in this area, are all within the same balancing area.		
Check meters have been installed as @ April 2021 and we have had the data provided by WCC. Genesis are just requiring some asset information and what assets have been connected to the two check meters to validate the accuracy of check meter volumes verse PLANet kWh & the manual calculation.		