

Compliance plan for Wellington CC DUML August 2021

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Mar-21</p> <p>To: 17-Aug-21</p>	<p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> • 109,200 kWh per annum over submission from field audit, • 18,572 per annum under submission due to incorrect lamp or gear wattages, • 2,776 kWh per annum under submission due to missing lamp or gear wattages, • 8,862 kWh per annum under submission due to static dimming applied to incorrect lamp types, and • 65 Christmas lights do not have ICP numbers recorded. <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Three times</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>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.</p>	<p>Continuous improvement</p>	<p>Investigating</p>
Preventative actions taken to ensure no further issues will occur	Completion date	

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

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of Schedule 15.3 From: 01-Mar-21 To: 17-Aug-21	62 items of load do not have GPS coordinates or street numbers Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate 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
Genesis continues to provide exception reporting to enable the customer to manage database discrepancies		Continuous improvement
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.		
		Investigating

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clauses 11(2)(c) and (d) of Schedule 15.3</p> <p>From: unknown</p> <p>To: 17-Aug-21</p>	<p>Some description and capacity information is incomplete or unknown, including:</p> <ul style="list-style-type: none"> • 131 lamps with unknown or blank lamp descriptions, • 13 items of load with zero wattage recorded, and • 13 blank gear wattages. <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>Controls are rated as moderate, as they are sufficient to ensure that almost all items of load have wattage and description information recorded.</p> <p>The impact is estimated to be low, based on the information available.</p>	
Actions taken to resolve the issue		Completion date
<p>Genesis met with WCC and discussed the continuation of issues within the database. The council has iterated that they continue to have it and resource constraints meaning they have not been able to complete the corrections in their database. This is a reiteration of the last audit and the council continues to struggle to meet the requirements for completeness. These exceptional are known to the council however to date have not been able to populate the details required.</p>		unknown
Preventative actions taken to ensure no further issues will occur		Completion date
<p>Genesis continues to review the data and raises any exceptions with the council where identified.</p>		unknown
Remedial action status		
Unknown		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clauses 11(2A) of Schedule 15.3 From: 01-Mar-20 To: 17-Aug-21	Nine additional items of load found in the March 2021 field audit. Potential impact: Low Actual impact: Low Audit history: Twice Controls: Moderate 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 taken to resolve the issue	Completion date	Remedial action status
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	
Genesis are unable to monitor assets that are missing from the database as it's just not possible, a field audit would locate any further assets, however the council will not be completing a full field audit.	unknown	

<p>Continue to work with the council to manage database discrepancies</p> <ul style="list-style-type: none"> • Introduce a new ICP to cater for locations of decorative Christmas lighting • Continue to manage the dimming of asset that are non-led • Continue to provide exception reporting to the council on the identified gear/lamp wattage and description anomalies 	unknown	
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Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-Mar-21 To: 17-Aug-21</p>	<p>The database used to prepare submissions contains some inaccurate information:</p> <ul style="list-style-type: none"> • 109,200 kWh per annum over submission from field audit, • 18,572 per annum under submission due to incorrect lamp or gear wattages, • 2,776 kWh per annum under submission due to missing lamp or gear wattages, • 8,862 kWh per annum under submission due to static dimming applied to incorrect lamp types, and • 65 Christmas lights do not have ICP numbers recorded. <p>Potential impact: High Actual impact: High Audit history: Three times Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<p>High</p>	<p>Overall, the controls are rated as weak, primarily due to the database accuracy issues discussed further in section 3.1.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>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.</p>	unknown	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	

<p>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.</p> <p>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.</p> <p>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.</p>	unknown	
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