Compliance Plan Invercargill City Council DUML 2021

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. In absolute terms, total annual consumption is estimated to be 101,800 kWh lower than the DUML database indicates as recorded in section 3. 1		
	Incorrect ballast applied for one lamp. Potential impact: High		
From: 01-Jul-21 To: 13-Dec-21	Actual impact: High Audit history: Multiple Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement. The impact is assessed to be high, based on the database accuracy detailed in section 3.1.		
Actions taken to resolve the issue		Completion date	Remedial action status
We have requested ICC to correct the incorrect ballast. We have also suggested ICC conduct a comprehensive review of the DUML database to improve the database accuracy. We are awaiting confirmation from ICC on when this full review will be able to be conducted and will continue to follow up as necessary.		Feb 22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once a full review has been conducted, we will be working with ICC to ensure regular reviews are conducted to maintain an updated database.		Ongoing	

All load recorded in database				
Non-compliance	Description			
Audit Ref: 2.5	Seven additional lights were found in the field.			
With: Clause 11(2A) of	1(2A) of Potential impact: Low			
Schedule 15.3	Actual impact: Low			
	Audit history: Multiple times previously			
From: 01-Jul-21	Controls: Moderate			
To: 13-Dec-21	Breach risk rating: 2			
Audit risk rating	Rationale for audit risk rating			
Low	The controls are rated as moderate because they ensure most information is accurate.			
	The impact is assessed to be low due to the small number of additional lights found in the field in relation to the overall count of the items of load.			
Actions taken to resolve the issue Completion date		Remedial action status		
We have requested ICC to review the field audit findings and update the database accordingly. We have also suggested ICC conduct a comprehensive review of the DUML database to improve the database accuracy. We are awaiting confirmation from ICC on when this full review will be able to be conducted and will continue to follow up as necessary.		Feb 22	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
Once a full review has been conducted, we will be working with ICC to ensure regular reviews are conducted to maintain an updated database.		Ongoing		

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 101,800 kWh lower than the DUML database indicates.		
	Incorrect ballast applied for one lamp resulting in an estimated very minor over submission of 30 kWh per annum.		
	Potential impact: High		
	Actual impact: High		
From: 01-Jul-21	Audit history: Multiple times		
To: 13-Dec-21	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.		
	The impact is assessed to be high, based on the kWh difference described above.		
Actions taken to resolve the issue Completion Remedial action s		Remedial action status	

Actions taken to resolve the issue	Completion date	Remedial action status
We have requested ICC to correct the incorrect ballast. We have also suggested ICC conduct a comprehensive review of the DUML database to improve the database accuracy. We are awaiting confirmation from ICC on when this full review will be able to be conducted and will continue to follow up as necessary.	Feb 22	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Once a full review has been conducted, we will be working with ICC to ensure regular reviews are conducted to maintain an updated database.	Ongoing	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	Database is not confirmed as accurate with a 95% level of confidence. In absolute terms, total annual consumption is estimated to be 101,800 kWh lower than the DUML database indicates as recorded in section 3. 1		
	Incorrect ballast applied for one lamp.		
	Potential impact: High		
	Actual impact: High		
From: 01-Jul-21	Audit history: Multiple times		
To: 13-Dec-21	Controls: Moderate		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
High	Controls are rated as moderate, as they are sufficient to mitigate the risk most of the time but there is room for improvement.		
	The impact is assessed to be high, based on the kWh difference described above		
Actions taken to resolve the issue		Completion date	Remedial action status
We have requested ICC to correct the incorrect ballast. We have also suggested ICC conduct a comprehensive review of the DUML database to improve the database accuracy. We are awaiting confirmation from ICC on when this full review will be able to be conducted and will continue to follow up as necessary.		Feb 22	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Once a full review has been conducted, we will be working with ICC to ensure regular reviews are conducted to maintain an updated database.		Proposed or actual date	