

Compliance plan for Vodafone DUML 2022

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1</p> <p>With: 11(1) of Schedule 15.3</p> <p>From: 01-Mar-21</p> <p>To: 21-May-22</p>	<p>Under submission of 450,100 kWh per annum due to previously incorrect wattage figures in the database.</p> <p>Incorrect submission for Auckland and Christchurch ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>The controls in place are rated as moderate because Mercury relied on information from the database holder, and it has taken until May 2022 for updated information to be supplied.</p> <p>The impact is assessed to be high based on the under submission of 450,100 kWh per annum.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
Vodafone's efforts have resulted in significant improvements to the database. We will apply the 72% factor to adjust the submission information, corrections will be reflected in revision files for the previous 14 months.		June 2022	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
Mercury and Vodafone have worked hard to ensure that the database is as accurate as possible; we will continue to collaborate to resolve any accuracy issues.		Ongoing	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: 15.2 and 15.37B(b)</p> <p>From: 01-Mar-21</p> <p>To: 21-May-22</p>	<p>Under submission of 450,100 kWh per annum due to previously incorrect wattage figures in the database.</p> <p>Incorrect submission for Auckland and Christchurch ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
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Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: 15.2 and 15.37B(c)</p> <p>From: 14-Jun-17</p> <p>To: 15-May-21</p>	<p>Under submission of 450,100 kWh per annum due to previously incorrect wattage figures in the database.</p> <p>Incorrect submission for Auckland and Christchurch ICPs.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Once</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
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