

Compliance plan for Marlborough Lines DUML audit for Genesis Energy– 2021

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 Clause 11(1) of Schedule 15.3</p> <p>From: 24-Oct-20 To: 14-Oct-21</p>	<p>SST profile incorrectly applied to ICP 0004450157ML277 resulting in the incorrect burn hours being used to calculate submissions.</p> <p>Submitted values do not match the database values resulting in an estimated under submission of 31,968 kWh per annum.</p> <p>The monthly wattage report provided does not track changes on a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate as processes to manage change capture most changes.</p> <p>The impact is assessed to be medium based on the submission values detailed above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has been using the summation details provided by Marlborough DC when reconciling the volumes. This has now been changed to using the raw data provided in order to calculate actual volumes used and is currently in the process of reviewing the consumption submitted in the last 14 months.</p> <p>Genesis has discussed with council the importance of tracking of change which will increase the database accuracy level.</p> <p>Regarding the profile of SST that was incorrectly assigned to ICP 0004450157ML277, this has now been rectified and updated to CST and backdated to Genesis gain date of the 01/04/2017.</p>	<p>01/01/2022</p> <p>01/06/2022</p> <p>01/01/2022</p>	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
<p>Genesis will continue to develop tracking of change requirements with the council to enable compliance to be achieved.</p>	Continuous improvement	

All load recorded in the database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 24-Oct-20 To: 14-Oct-21	Two additional items of load found in the field of the 470 items of load sampled. Potential impact: Low Actual impact: Low Audit history: Once Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as Marlborough Lines have robust processes to ensure that changes are tracked, and this is reflected in the high level of accuracy found in the database. The impact is assessed to be low as the database was found to be within the allowable accuracy threshold as detailed in section 3.1 .	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed the audit findings with the council with the intent the council makes every effort to ensure the exceptions are rectified.	Continuous improvement	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
No comments provided.		

Tracking of load change		
Non-compliance	Description	
Audit Ref: 2.6 Clause 11(3) of Schedule 15.3 From: 24-Oct-20 To: 14-Oct-21	Changes not tracked. 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 as whilst the processes for updating the database are robust, it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed with council the importance of tracking of change which will increase the database accuracy level.	Continuous improvement	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis will continue to develop tracking of change requirements with the council to enable compliance to be achieved.	Continuous improvement	

Audit trails		
Non-compliance	Description	
Audit Ref: 2.7 Clause 11(4) of Schedule 15.3 From: 24-Oct-18 To: 30-Sep-20	Audit trail not visible. 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 as whilst the processes for updating the database are robust, it was not proven that the database is able to meet the requirements of the code. The audit risk rating is low as the volume of changes is not high.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has discussed with council the importance of tracking of change which will increase the database accuracy level.	Continuous improvement	Investigating
Preventative actions taken to ensure no further issue will occur	Completion date	
Genesis will continue to develop tracking of change requirements with the council to enable compliance to be achieved.	Continuous improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2 Clause 15.2 and 15.37B(c)</p> <p>From: 24-Oct-20 To: 14-Oct-21</p>	<p>SST profile incorrectly applied to ICP 0004450157ML277 resulting in the incorrect burn hours being used to calculate submissions.</p> <p>Submitted values do not match the database values resulting in an estimated under submission of 31,968 kWh per annum.</p> <p>The monthly wattage report provided does not track changes on a daily basis and is provided as a snapshot.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate as processes to manage change capture most changes.</p> <p>The impact is assessed to be medium based on the submission values detailed above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis has been using the summation details provided by Marlborough DC when reconciling the volumes. This has now been changed to using the raw data provided in order to calculate actual volumes used and is currently in the process of reviewing the consumption submitted in the last 14 months.</p> <p>Regarding the profile of SST that was incorrectly assigned to ICP 0004450157ML277, this has now been rectified and updated to CST and backdated to Genesis gain date of the 01/ 04/2017.</p> <p>Genesis has discussed with the council the importance of tracking of change which will increase the database accuracy level.</p>	<p>01/01/2022</p> <p>01/01/2022</p> <p>01/06/2022</p>	Identified
Preventative actions taken to ensure no further issue will occur	Completion date	
<p>Genesis will continue to develop tracking of change requirements with the council to enable compliance to be achieved.</p>		