Compliance plan for Christchurch City Council unmetered traffic lights DUML 2024

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	Two DUML ICPs with metered load associated.		
With: Clause 11(1) of Schedule 15.3	Over submission occurring as both metered and unmetered load are being submitted for the same items of load. The quantity is unable to be determined as the items of load being measured by the meter are unknown.		
	The field audit found that the database is not confirmed as accurate within +/-5%. In absolute terms, total annual consumption is estimated to be 94,000 kWh higher than the DUML database indicates. Changes made in the field during the audit period have not been updated in the database.		
	Daily kWh information for cameras was not included in the daily calculations for 269 sites.		
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot. Potential impact: High Actual impact: High		
From: 8 March 2022	Audit history: Multiple times previously		
To: 26 March 2024	Controls: Weak		
	Breach risk rating: 9		
Audit risk rating	Rationale for audit risk rating		
High	The controls are recorded as weak due to the high number of errors found in the field audit which indicates that the database has not been updated to reflect changes in the field.		
	The impact is assessed to be high due to the impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
CCC and Simply continuing to work on these two sites to resolve		01/08/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Once resolved, preventative actions will be put in place		01/08/2024	

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3	111 additional items of load found sampled. Potential impact: High Actual impact: Medium	d in the field of 1,978	items of load
From: 18 April 2023	Audit history: Twice		
To: 26 March 2024	Controls: Weak		
	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are rated as weak as changes in the field are not being updated in the database. The impact is assessed to be medium due to the number of additional lights		
	found in the field and the impact on submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
CCC is continuing to work on adding robust processes to ensure all additional lights added are captured		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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Audit trail			
Non-compliance	Description		
Audit Ref: 2.7	No audit trail of changes made in the access database.		
With: Clause 11(4) of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: Multiple times		
From: 8 March 2022	Controls: Weak		
To: 26 March 2024	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak because audit trails do not exist.		
	The impact is rated as low, because it does not affect submission.		
Actions taken to resolve the issue		Completion date	Remedial action status
CCC are planning to move all records to RAMM which will resolve this issue		31/03/2025	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
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Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	The field audit found that the database is not confirmed as accurate within +/-5%. In absolute terms, total annual consumption is estimated to be 94,000 kWh higher than the DUML database indicates. Changes made in the field during the audit period have not been updated in the database. Daily kWh information for cameras was not included in the daily calculations			
	for 269 sites.		,	
Potential impact: High				
	Actual impact: High			
From: 18 February	Audit history: Multiple times previously			
2023	Controls: Weak			
To: 26 March 2024	Breach risk rating: 9			
Audit risk rating	Rationale for audit risk rating			
High	The controls are recorded as weak due to the high number of errors found in the field audit which indicates that the database has not been updated to reflect changes in the field.			
	The impact is assessed to be high due to the impact on submission.			
Actions taken to resolve the issue		Completion date	Remedial action status	
CCC is continuing to work on adding robust processes to ensure all additional lights added are captured		31/03/2025	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
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Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2	Two DUML ICPs with metered load associated.		
With: Clause 15.2 and 15.37B(c)	Over submission occurring as both metered and unmetered load are being submitted for the same items of load. The quantity is unable to be determined as the items of load being measured by the meter are unknown.		
	The field audit found that the database is not confirmed as accurate within +/-5%. In absolute terms, total annual consumption is estimated to be 94,000 kWh higher than the DUML database indicates. Changes made in the field during the audit period have not been updated in the database.		
Daily kWh information for cameras was not included in the daily ca for 269 sites.			n the daily calculations
	The monthly database extract provided does not track changes at a daily basis and is provided as a snapshot.		
	Potential impact: High		
	Actual impact: High		
	Audit history: Multiple times previously		
	Controls: Weak		
From: 18-Mar-21	Breach risk rating: 9		
To: 26-Mar-24			
Audit risk rating	Rationale for audit risk rating		
High	The controls are recorded as weak due to the high number of errors found in the field audit which indicates that the database has not been updated to reflect changes in the field.		
	The impact is assessed to be high due to the impact on submission.		
Actions taken to resolve the issue		Completion date	Actions taken to resolve the issue
CCC and Simply continuing to work on these two sites to resolve		01/08/2024	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
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