

## Compliance plan for Whakatane DC GENE DUML 2024

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 08-Oct-21 To: 14-Jun-24</p>	<p>11 items of load submitted on both ICP 1000023042BPD32 and 1000023060BPOE2 resulting in an estimated over submission of 7,850 kWh since February 2020 to date.</p> <p>Incorrect NST profile applied to ICPs 1000023047BP07D and 1000023042BPD32. NST profile is no longer suitable for use as recorded in the 2023 profile audit. Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Variance found between the kWh figure submitted by Genesis and the RAMM database extract, resulting in an estimated annual under submission 114,261 kWh per annum.</p> <p>No database reporting is being provided and therefore changes made in the database are not reflected in submissions.</p> <p>Potential impact: High Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
<b>High</b>	<p>The controls are rated as weak as the submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the submission variances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis continues to work on its application for a new profile and have these applied in the registry.</p> <p>Genesis &amp; WDC are aware of the findings and will continue to work together in gaining RAMM data and the use of Telensa data for billing &amp; submission purposes</p>	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Genesis has had its profile shape application submitted and is working on applying these in the registry.</p>	Continuous Improvement	

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)  From: 01-Jul-23 To: 14-Jun-24	10 items of load with insufficient light description of "LED" and actual wattages are unknown.  New connections are recorded from the time of vesting, not from the time of livening.  Potential impact: Low  Actual impact: Low  Audit history: Multiple times  Controls: Moderate  Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement.  The audit risk rating is assessed to be low due to the error in kWh.	
Actions taken to resolve the issue	Completion date	Remedial action status
WDC are aware of the findings and Genesis will investigate this with Horizon & WDC to ensure livening dates are being captured in a timely manner to ensure accuracy	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
WDC are aware of the findings and Genesis will investigate this with Horizon & WDC to ensure livening dates are being captured in a timely manner to ensure accuracy	Continuous Improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 08-Oct-21</p> <p>To: 14-Jun-24</p>	<p>11 items of load submitted on both ICP 1000023042BPD32 and 1000023060BPOE2 resulting in an estimated over submission of 7,850 kWh since February 2020 to date.</p> <p>Incorrect NST profile applied to ICPs 1000023047BP07D and 1000023042BPD32. NST profile is no longer suitable for use as recorded in the 2023 profile audit. Actual on/off times are different to the fixed 11.9 hours used by Genesis.</p> <p>Variance found between the kWh figure submitted by Genesis and the RAMM database extract, resulting in an estimated annual under submission 114,261 kWh per annum.</p> <p>No database reporting is being provided and therefore changes made in the database are not reflected in submissions.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak as the submission is not calculated from the database and the burn hours used to calculate submission are fixed but are variable in the field.</p> <p>The impact is assessed to be high due to the submission variances.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work on its application for a new profile and have these applied in the registry. Genesis & WDC are aware of the findings and will continue to work together in gaining RAMM data and the use of Telensa data for billing & submission purposes	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has had its profile shape application submitted and is working on applying these in the registry.	Continuous Improvement	