

Compliance plan for Whakapapa Village – DoC and Genesis Energy 2024

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Apr-24 To: 15-May-24</p>	<p>A copy of the DUML database has not been provided by DoC, and changes are not tracked.</p> <p>Accuracy of the registry value used for submission was checked by reviewing Meridian’s DUML database, which this value is based on. The field audit found that the best available estimate indicates that the database which the submission value is based on is not accurate within $\pm 5.0\%$. Total annual consumption is estimated to be 2,736 kWh higher than the DUML database indicates.</p> <p>An error resulted in the daily kW being accidentally applied as the daily kWh when calculating submissions from November 2023 to April 2024 which resulted in under submission of 42.62 kWh per day or 7,756.84 kWh in total. Genesis corrected the error during the audit and provided evidence that revised submission information has been calculated and will be washed up.</p> <p>Potential impact: Low Actual impact: Low Audit history: Twice previously Controls: Weak Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are weak. A copy of the database has not been provided and submission is based on historic database information which was found not to be accurate within $\pm 5\%$.</p> <p>The audit risk rating is low because:</p> <ul style="list-style-type: none"> • The differences due to the submission calculation error have been corrected and revised information will be provided through the wash up process. • The estimated volume under submitted due to database accuracy issues resulting in an incorrect average daily kWh is 2,736.4 kWh per annum. 	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to contact with DOC in securing accurate data.	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
The error identified in the incorrect average daily kWh being applied has now been corrected and revised for the period November 2023 – April 2024 as part of our wash up process.	15.05.2024	

All load recorded in the database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 07-May-24 To: 07-May-24	A net seven additional lights were identified in the field, and one light appears to have an incorrect location recorded. Potential impact: Low Actual impact: Low Audit history: Once Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are weak. Although there are processes in place to request updates to database information, there are some lights missing from the database and it is not accurate within $\pm 5\%$. The audit risk rating is low because the estimated volume under submitted is 2,736.4 kWh per annum.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis continues to work with DOC to ensure accurate datasets & changes are being provided.		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis has created an updated dataset based on the findings and are currently having this reviewed with DOC		Continuous Improvement	

Tracking of load changes	
Non-compliance	Description
Audit Ref: 2.6 With: Clause 11(3) of Schedule 15.3 From: 01-Apr-24 To: 15-May-24	A copy of the DUML database has not been provided by DoC, and changes are not tracked. Potential impact: Low Actual impact: Low Audit history: None Controls: None Breach risk rating: 5
Audit risk rating	Rationale for audit risk rating
Low	There are no controls. A copy of a database has not been provided by DoC and changes are not currently tracked.

	The audit risk rating is low because the estimated volume difference between submission based on the registry information and the field audit is 2,736.4 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with DOC to ensure accurate datasets & changes are being provided.	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has created an updated dataset based on the findings and are currently having this reviewed with DOC	Continuous Improvement	

Audit trails		
Non-compliance	Description	
Audit Ref: 2.7 With: Clause 11(4) of Schedule 15.3 From: 01-Apr-24 To: 15-May-24	A copy of the DUML database has not been provided by DoC, and changes are not tracked. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are weak. A copy of a database has not been provided by DoC, but Meridian's database which submission is based on did have audit trails. The audit risk rating is low because the estimated volume difference between submission based on the registry information and the field audit is 2,736.4 kWh per annum.	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with DOC to ensure accurate datasets & changes are being provided.	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has created an updated dataset based on the findings and are currently having this reviewed with DOC	Continuous Improvement	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Apr-24</p> <p>To: 07-May-24</p>	<p>A copy of the DUML database has not been provided by DoC.</p> <p>Accuracy of the registry value used for submission was checked by reviewing Meridian's DUML database, which this value is based on. The field audit found that the best available estimate indicates that the database which the submission value is based on is not accurate within $\pm 5.0\%$. Total annual consumption is estimated to be 2,736 kWh higher than the DUML database indicates.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are weak. A copy of the database has not been provided and submission is based on historic database information which was found not to be accurate within $\pm 5\%$.</p> <p>The audit risk rating is low because:</p> <ul style="list-style-type: none"> The differences due to the submission calculation error have been corrected and revised information will be provided through the wash up process. The estimated volume under submitted due to database accuracy issues resulting in an incorrect average daily kWh is 2,736.4 kWh per annum. 	
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Genesis continues to work with DOC to ensure accurate datasets & changes are being provided.	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has created an updated dataset based on the findings and are currently having this reviewed with DOC	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: 01-Apr-24</p> <p>To: 15-May-24</p>	<p>A copy of the DUML database has not been provided by DoC, and changes are not tracked.</p> <p>Accuracy of the registry value used for submission was checked by reviewing Meridian's DUML database, which this value is based on. The field audit found that the best available estimate indicates that the database which the submission value is based on is not accurate within $\pm 5.0\%$. Total annual consumption is estimated to be 2,736 kWh higher than the DUML database indicates.</p> <p>An error resulted in the daily kW being accidentally applied as the daily kWh when calculating submissions from November 2023 to April 2024 which resulted in under submission of 42.62 kWh per day or 7,756.84 kWh in total. Genesis corrected the error during the audit and provided evidence that revised submission information has been calculated and will be washed up.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Twice previously</p> <p>Controls: Weak</p> <p>Breach risk rating: 3</p>	
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