## Carterton District Council DUML Compliance Plan 2024

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	The DUML load is submitted using HHR profile, without an exemption in place.		
With: Clause 11(1) of Schedule 15.3	The field audit found that the best available estimate indicates that the database is not accurate within ±5.0%. In absolute terms, total annual consumption is estimated to be 4,400 kWh higher than the DUML database indicates. If we take into account that the Pembroke SL lights are to be removed from the database soon and exclude them from the analysis, the database is considered to be accurate within ±5.0%.		
	An error was made when determining the kW for submission for ICP 0020903000WRADA for March 2024. Mercury had applied the wattage for all ICPs in the extract (30,355W) instead of only DUML ICP 0020903000WRADA (27,775W) resulting in over submission of 2,580 W or 941 kWh. Mercury intends to correct and wash up corrected submission information.		
	Asset ID 1406 has a lamp wattage of zero but 100W was expected, resulting in potential under submission of 427.10 kWh per annum.		
	14 L500 150W have a 14W gear wattage but 18W is expected, resulting in potential under submission of 239.2 kWh per annum.		
	Asset ID 660 has make and model = Vizulo Mini Martin but a lamp wattage of 70W and gear wattage of 13W. Other lights of the same type are recorded in the database with lamp wattage of 28W and gear wattage of zero. This results in potential over submission of 234.9 kWh per annum.		
	The monthly database extract is provided as a snapshot.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Multiple times		
From: 01-Mar-24	Controls: Moderate		
To: 09-May-24	Breach risk rating: 2		
Audit risk rating	Rationale	for audit risk rat	ing
Low	The controls are moderate because they ensure most information is accurate. The impact is low based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
We are in the process of drafting profile applications that once approved by the EA will allow us to submit HHR for DUML without being non-compliant. Plan to submit the applications to the EA before the end of June 2024  Mercury is correcting and doing a washup for the ICP error.  Carterton plan to carry out their own full field audit to ensure that the database is 100% accurate.		June 2024	Identified

For Carterton providing a snapshot is the only practical way at this stage.	
Preventative actions taken to ensure no further issues will occur	Completion date
Following their own checks to ensure that the database is 100% accurate, Carterton plans to implement a new process to ensure that any changes in the field are recorded in the database.	Ongoing

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4	Asset ID 1406 has a lamp wattage of zero but 100W was expected.		
With: Clause 11(2)(c) and	Potential impact: Low		
(d) of Schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 09-May-24	Controls: Strong		
To: 09-May-24	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are strong, because only one missing lamp wattage was identified.		
	The impact is low, because the error is expected to result in under submission of 427.10 kWh per annum.		
Actions taken to resolve the issue		Completion date	Remedial action status
Carterton advised that this item will be getting removed from the database as the council is no longer the owner of that particular site and the lights will be physically removed.		June 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
As above.		N/A	

All load recorded in databa	ase		
Non-compliance	Description		
Audit Ref: 2.5	One L27 opposite the boundary of 8 Endelave Way was not recorded in the database.		
With: Clause 11(2A) of	Potential impact: Low		
Schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 09-May-24	Controls: Strong		
To: 09-May-24	Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are strong, and the impact is low because only one missing light was identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Carterton confirmed that they will be updating the database to include this item.		June 2024	Identified
Preventative actions tak	en to ensure no further issues will	Completion date	

Ongoing

Following their own checks to ensure that the database is 100%

accurate, Carterton plans to implement a new process to ensure that any changes in the field are recorded in the database.

Database accuracy		
Non-compliance	Description	
Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)	The field audit found that the best available estimate indicates that the database is not accurate within $\pm 5.0\%$ . In absolute terms, total annual consumption is estimated to be 4,400 kWh higher than the DUML database indicates. If we take into account that the Pembroke SL lights are to be removed from the database soon and exclude them from the analysis, the database is considered to be accurate within $\pm 5\%$ .	
	Asset ID 1406 has a lamp wattage of zero but 100W was expected, resulting in potential under submission of 427.10 kWh per annum.	
	14 L500 150W have a 14W gear wattage but 18W is expected, resulting in potential under submission of 239.2 kWh per annum.	
	Asset ID 660 has make and model = Vizulo Mini Martin but a lamp wattage of 70W and gear wattage of 13W. Other lights of the same type are recorded in the database with lamp wattage of 28W and gear wattage of zero. This results in potential over submission of 234.9 kWh per annum.	
	Potential impact: Low	
	Actual impact: Low	
	Audit history: Multiple times	
	Controls: Moderate	

From: 01-Mar-24 To: 09-May-24	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are moderate because they ensure most information is accurate. The impact is low based on the kWh differences described above.		

Actions taken to resolve the issue	Completion date	Remedial action status
Carterton plan to carry out their own full field audit to ensure that the database is 100% accurate.	June 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Following their own checks to ensure that the database is 100% accurate, Carterton plans to implement a new process to ensure that any changes in the field are recorded in the database	Ongoing	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2	The DUML load is submitted using HHR profile, without an exemption in place.		
With: Clause 15.2 and 15.37B(c)	The field audit found that the best available estimate indicates that the database is not accurate within ±5.0%. In absolute terms, total annual consumption is estimated to be 4,400 kWh higher than the DUML database indicates. If we take into account that the Pembroke SL lights are to be removed from the database soon and exclude them from the analysis, the database is considered to be accurate within ±5.0%.		
From: 01-Mar-24	An error was made when determining the kW for submission for ICP		
To: 09-May-24	0020903000WRADA for March 2024. Mercury had applied the wattage for all ICPs in the extract (30,355W) instead of only DUML ICP 0020903000WRADA (27,775W) resulting in over submission of 2,580 W or 941 kWh. Mercury intends to correct and wash up corrected submission information.		
	Asset ID 1406 has a lamp wattage of zero but 100W was expected, resulting in potential under submission of 427.10 kWh per annum.		
	14 L500 150W have a 14W gear wattage but 18W is expected, resulting in potential under submission of 239.2 kWh per annum.		
	Asset ID 660 has make and model = Vizulo Mini Martin but a lamp wattage of 70W and gear wattage of 13W. Other lights of the same type are recorded in the database with lamp wattage of 28W and gear wattage of zero. This results in potential over submission of 234.9 kWh per annum.		
	The monthly database extract is provided as a snapshot.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Multiple times		
	Controls: Moderate		

	Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are moderate because they ensure most information is accurate. The impact is low based on the kWh differences described above.	

Actions taken to resolve the issue	Completion date	Remedial action status
We are in the process of drafting profile applications that once approved by the EA will allow us to submit HHR for DUML without being non-compliant. Plan to submit the applications to the EA before the end of June 2024	June 2024	Identified
Mercury is correcting and doing a washup for the ICP error.		
Carterton plan to carry out their own full field audit to ensure that the database is 100% accurate.		
For Carterton providing a snapshot is the only practical way at this stage.		
Preventative actions taken to ensure no further issues will	Completion	
occur	date	
Following their own checks to ensure that the database is 100% accurate, Carterton plans to implement a new process to ensure that any changes in the field are recorded in the database	Ongoing	