

Compliance plan for Genesis Waka Kotahi Lower North DUML, 2024

Audit			
Non-compliance	Description		
Audit Ref: 1.10 With: Clause 16A.26 From: 13-Oct-23 To: 01-Mar-24	Audit not submitted by the due date. Potential impact: Medium Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate as Genesis has robust processes in place to ensure DUML audits are completed within the required timeframe, but a database extract was not provided within the required timeframe for this audit causing it to be late. The audit risk rating is assessed to be low overall, but I note that the delay in completing the audit in this case caused five months of inaccurate submissions that could have been avoided had the audit been completed on time and corrections made.		
Actions taken to resolve the issue		Completion date	Remedial action status
Genesis is now receiving regular monthly data extracts		Completed	
Preventative actions taken to ensure no further issues will occur		Completion date	
Genesis is now receiving regular monthly data extracts		Completed	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-Jul-22 To: 31-Jan-24</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated over submission of 62,900 kWh per annum but could be as high as 189,500 kWh per annum.</p> <p>Potential impact: High Actual impact: High Audit history: Twice previously</p> <p>Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as weak as the processes to keep the database up to date do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is high based on the kWh error; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has recently reviewed the loggers and made submission corrections dating back from November 2022 onwards.	On-going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has corrected the loggers. Genesis continues to work with Waka Kotahi to ensure accuracy of their database.	On-going	

Description and capacity of load		
Non-compliance	Description	
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p> <p>From: 01-Oct-21</p> <p>To: 30-Jun-22</p>	<p>77 items of load have no lamp description.</p> <p>Two items have an unknown light make and model.</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 recorded as weak as the processes to keep the database up to date do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be low based on the number of items of load impacted.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with Waka Kotahi to increase the accuracy of their database. Corrections have started to be made based on the audit findings and the customer is aware of this recommendation.	On-Going	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with Waka Kotahi to increase the accuracy of their database. Corrections have started to be made based on the audit findings and the customer is aware of this recommendation.	On-Going	

All load recorded in database		
Non-compliance	Description	
<p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 01-Jul-22</p> <p>To: 31-Jan-24</p>	<p>40 items of load in the field not recorded in the database from a sample of 478 items of load checked. This represents an 8% error. This discrepancy is included in the total field audit discrepancy recorded in section 3.1.</p> <p>Potential impact: Medium</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 recorded as weak as the processes to keep the database up to date do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is minor; therefore, the audit risk rating is low.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with Waka Kotahi to increase the accuracy of their database. Corrections have started to be made based on the audit findings and the customer is aware of this finding.	Continuous	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with Waka Kotahi to increase the accuracy of their database. Corrections have started to be made based on the audit findings and the customer is aware of this finding.	Continuous	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Jun-22 To: 31-Jan-24</p>	<p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated over submission of 62,900 kWh per annum but could be as high as 189,500 kWh per annum.</p> <p>77 items of load with no lamp model details recorded.</p> <p>Two items with unknown light model recorded.</p> <p>Change management processes are ineffective with 33% of the sample found to be incorrect.</p> <p>Potential impact: High Actual impact: High Audit history: Twice previously Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are recorded as weak as the processes to keep the database up to date do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is moderate based on the kWh error; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis continues to work with Waka Kotahi to increase the accuracy of their database. Waka Kotahi are also aware of the findings.	Continuous	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with Waka Kotahi to increase the accuracy of their database. Waka Kotahi are also aware of the findings.	Continuous	

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-Jul-22</p> <p>To: 31-Jan-24</p>	<p>Corrections not carried out within the 14-month revision period resulting in an under submission of 9,262 kWh for June 2022 due to the incorrect burn hours being used.</p> <p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated over submission of 62,900 kWh per annum but could be as high as 189,500 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Twice 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 recorded as weak as the processes to keep the database up to date do not mitigate risk to an acceptable level.</p> <p>The impact on settlement and participants is high based on the kWh error; therefore, the audit risk rating is high.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Genesis has recently reviewed the loggers and made submission corrections dating back from November 2022 onwards.	Completed	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis has recently reviewed the loggers and made submission corrections dating back from November 2022 onwards.	Completed	