

## Compliance plan for GENE Nulite DUML, 2024

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26 From: 18-Apr-24 To: 21-Jun-24	Audit not completed within the timeframe specified by the Electricity Authority. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are rated as strong, as contact has now been established with Nulite and this is not expected to occur again. The impact is assessed to be low, as this has no direct impact on reconciliation.	
Actions taken to resolve the issue	Completion date	Remedial action status
Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Communication has been established between Genesis and Nulite and we have made progress on getting a corrected datasheet with full data in place.	Continuous Improvement	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>The registry values are used to derive submissions with the following impacts:</p> <ul style="list-style-type: none"> <li>no database in place for the West Auckland DUML load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh per annum, and</li> <li>registry being used rather than a database resulting in an estimated annual under submission of 2,845.51 kWh per annum.</li> </ul> <p>Ballast not being included in the submission calculations. The impact of this is included in the estimated submission variances above.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls are rated as moderate as Genesis is working with Nulite to have an accurate database in place.</p> <p>The impact is assessed to be medium due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>	Continuous Improvement	

ICP Identifier			
Non-compliance	Description		
<p>Audit Ref: 2.2 With: 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: Unknown To: 21-Jun-24</p>	<p>No database in place for the West Auckland DUML load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: None Controls: Moderate Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls in place are rated as moderate as Genesis is working with Nulite to determine a database source for ICP 0000455891UN0A2.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>		Continuous Improvement	

Location of each item of load			
Non-compliance	Description		
<p>Audit Ref: 2.3</p> <p>With: Clause 11(2)(b) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>No database and therefore no locations for the items of load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls in place are rated as moderate as Genesis is working with Nulite to determine a database source for ICP 0000455891UN0A2.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>		Continuous Improvement	

Description and capacity of load			
Non-compliance	Description		
<p>Audit Ref: 2.4</p> <p>With: 11(2)(c) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>Ballast and total wattage are not recorded in the spreadsheet.</p> <p>No database and therefore description or capacity details for the items of load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls in place are rated as moderate as Genesis is working with Nulite to confirm these details and determine a database source for ICP 0000455891UN0A2.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>		Continuous Improvement	

All load recorded in the database			
Non-compliance	Description		
<p>Audit Ref: 2.5</p> <p>With: 11(2A) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>11 additional lights found in the field.</p> <p>No database in place for the items of load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls are rated as moderate as Genesis is working with Nulite to have an accurate database.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>		Continuous Improvement	

Tracking of load change		
Non-compliance	Description	
<p>Audit Ref: 2.6</p> <p>With: 11(3) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>No database and therefore no tracking of load change for the items of load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls in place are rated as moderate as Genesis is working with Nulite to determine a database source for ICP 0000455891UN0A2.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>	Continuous Improvement	

Audit trail		
Non-compliance	Description	
<p>Audit Ref: 2.7</p> <p>With: 11(4) of Schedule 15.3</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>No database and therefore no audit trail for any changes made for the load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
<b>Medium</b>	<p>The controls in place are rated as moderate as Genesis is working with Nulite to determine a database source for ICP 0000455891UN0A2.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>	Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.	Continuous Improvement	



Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: 15.2 and 15.37B(b)</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>The field audit found the spreadsheet was inaccurate resulting in an estimated under submission of 35,341.75 kWh per annum if the spreadsheet was used for submission.</p> <p>No database in place for the West Auckland DUML load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh.</p> <p>Ballast is missing for all items of load. The effect on submission if the existing spreadsheet was used for submission is calculated above.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
<b>Medium</b>	<p>The controls are rated as moderate as Genesis is working with Nulite to have an accurate database in place.</p> <p>The audit risk rating is assessed to be medium based on the impact of over submission for ICP 0000455891UN0A2.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>		Continuous Improvement	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Communication has been established between Genesis and Nulite and we have made progress in getting a corrected datasheet with full data in place.</p>		Continuous Improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clauses 15.2 and 15.37B(c)</p> <p>From: Unknown</p> <p>To: 21-Jun-24</p>	<p>The registry values are used to derive submissions with the following impacts:</p> <ul style="list-style-type: none"> <li>no database in place for the West Auckland DUML load associated with ICP 0000455891UN0A2 resulting in an estimated over submission of 18,547.32kWh per annum, and</li> <li>registry being used rather than a database resulting in an estimated annual under submission of 2,845.51 kWh per annum.</li> </ul> <p>Ballast not being included in the submission calculations. The impact of this is included in the estimated submission variances above.</p> <p>Regular reporting is not being provided to Genesis, submission is based on a historical snapshot and does not consider changes or adjustments.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Once previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate as Genesis is working with Nulite to have an accurate database in place.</p> <p>The impact is assessed to be medium due to the impact on submission.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis and Nulite have been working together to create a manageable database for all ICP load including 0000455891UN0A2. Communication has been built and Nulite are aware of the expectation and importance of notifying Genesis in a timely manner of any changes in field.</p> <p>Once the database has been established and is accurate the registry load will be corrected for submissions.</p>	Continuous Improvement	Identified
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