

# Compliance plan for Hastings District Council, Manawa DUMML 2024

| Deriving submission information   |   |                        |
|---|---|------------------------|
| Non-compliance  | Description   |                        |
| <p>Audit Ref: 2.1<br/>With: Clause 11(1) of Schedule 15.3</p> <p>From: 03-Jul-23<br/>To: 08-Apr-24</p>  | <p>Very minor over submission of 2.99kWh for ICP 0000045104HB052 for the month of March 2024.</p> <p>Potential under submission of 7,614 kWh for the month of March 2024.</p> <p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated under submission of 19,700 kWh per annum.</p> <p>Ten items of load with the incorrect ballast applied resulting in a very minor estimated over submission of 174.3 kWh per annum.</p> <p>Inaccurate on and off times as the logger times will vary slightly from the CMS on and off times.</p> <p>Potential impact: Medium<br/>Actual impact: Medium</p> <p>Audit history: Multiple times<br/>Controls: Moderate<br/>Breach risk rating: 4</p> |                        |
| Audit risk rating   | Rationale for audit risk rating   |                        |
| <b>Medium</b>   | <p>The controls are rated as moderate overall but there is room for improvement.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>  |                        |
| Actions taken to resolve the issue  | Completion date   | Remedial action status |
| <p>As above, a comparison has been conducted by BECA who manages the database on behalf of the HDC, it was identified that the extracted information for the audit contained state highway lights that are removed from the data set each month, this explains why the dataset Manawa provided Veritek had different Lamp and wattage counts to that provided by HDC.</p> | 31/05/2024  | Investigating          |

| Preventative actions taken to ensure no further issues will occur  | Completion date |
|--|-----------------|
| <p>Manawa will reach out to its contact at NZTA to confirm that the lamps that are being filtered out of the data each month, are actually included in another database with NZTA, once confirmation is provided HDC will be able to instruct BECA to remove them altogether.</p> <p>A meeting has been organised for post audit to discuss HDCs CMS and plans for dimming; this will be done in conjunction with their DB maintenance contractor BECA. This should help us to improve the accuracy of submission by understanding more accurate on/off times.</p> | 01/10/2024      |

| All load recorded in the database   |  |                        |
|---|--|------------------------|
| Non-compliance  | Description  |                        |
| <p>Audit Ref: 2.5</p> <p>With: Clause 11(2A) of Schedule 15.3</p> <p>From: 03-Jul-23</p> <p>To: 08-Apr-24</p>   | <p>Six additional lights identified in the field audit.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Four times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>                            |                        |
| Audit risk rating   | Rationale for audit risk rating  |                        |
| <b>Low</b>  | <p>The controls are rated as moderate as the processes in place to update the database are generally robust.</p> <p>The impact is assessed to be low based on the small number of additional lights found in relation to the sample checked.</p> |                        |
| Actions taken to resolve the issue  | Completion date  | Remedial action status |
| <p>Manawa is working with HDC to confirm that the confirmation process conducted by their contractor Pope electrical, when updating the DB, is being followed correctly, particularly around the addition of new lamps.</p> | 01/08/2024   | Investigating          |
| Preventative actions taken to ensure no further issues will occur   | Completion date  |                        |
| <p>As well as confirming the process is being followed by the contractor, Manawa will work with HDC to assess whether this process is still fit for purpose.</p>  | [proposed or actual date]  |                        |

| Database accuracy  |   |                        |
|--|---|------------------------|
| Non-compliance   | Description   |                        |
| <p>Audit Ref: 3.1</p> <p>With: Calsie 15.2 and 15.37B(b)</p> <p>From: 03-Jul-23</p> <p>To: 08-Apr-24</p>   | <p>Database assessed to have poor precision therefore the potential error is greater than 5% resulting in an estimated under submission of 19,700 kWh per annum.</p> <p>Ten items of load with the incorrect ballast applied resulting in a very minor estimated over submission of 174.3 kWh per annum.</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 overall but there is room for improvement.</p> <p>The impact is assessed to be medium, based on the kWh differences described above.</p>  |                        |
| Actions taken to resolve the issue   | Completion date   | Remedial action status |
| As above, a comparison has been conducted by BECA who manages the database on behalf of the HDC, it was identified that the extracted information for the audit contained state highway lights that are removed from the data set each month, this explains why the dataset Manawa provided Veritek had different Lamp and wattage counts to that provided by HDC.   | 31/05/2024  | Investigating          |
| Preventative actions taken to ensure no further issues will occur  | Completion date   |                        |
| <p>Manawa will reach out to its contact at NZTA to confirm that the lamps that are being filtered out of the data each month, are actually included in another database with NZTA, once confirmation is provided HDC will be able to instruct BECA to remove them altogether.</p> <p>Manawa will also work with HDC to get them to update their incorrect ballast information identified in this audit</p> | 01/10/2024  |                        |

| Volume information accuracy  |  |                        |
|--|--|------------------------|
| Non-compliance   | Description  |                        |
| <p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 03-Jul-23</p> <p>To: 08-Apr-24</p>   | <p>Very minor over submission of 2.99kWh for ICP 0000045104HB052 for the month of March 2024.</p> <p>Potential under submission of 7,614 kWh for the month of March 2024.</p> <p>Database assessed as having poor precision therefore the potential error is greater than 5.0% resulting in an estimated under submission of 19,700 kWh per annum.</p> <p>Ten items of load with the incorrect ballast applied resulting in a very minor estimated over submission of 174.3 kWh per annum.</p> <p>Inaccurate on and off times as the logger times will vary slightly from the CMS on and off times.</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> |                        |
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