

# Compliance plan for Christchurch City Council Contact Energy DUML 2024

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 24-Nov-23 To: 06-May-24</p>	<p>In absolute terms, total annual consumption is estimated to be 466,900kWh lower than the DUML database indicates.</p> <p>Estimated over submission of 443,543 kWh per annum based on dimming of 31,000 lamps.</p> <p>Over submission of approx. 25,489 kWh per annum due to incorrect monthly reporting.</p> <p>Nine metered items of load recorded against an unmetered ICP resulting in a very minor amount of over submission.</p> <p>Potential impact: High Actual impact: High Audit history: Multiple times previously</p> <p>Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>The controls are rated as weak because they do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Check meters have been installed, Simply and Smartco now to work together to capture the data from the check meters	01.08.2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
No comments provided		

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3 From: 24-Nov-23 To: 06-May-24	40,761 items of load have insufficient descriptions. Potential impact: Low Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate because the process to determine wattages is robust, but such detail is not required by Orion. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
CCC is working to correct these and to extend fields to allow better descriptions	01.01.2025	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
No comments provided		

All load recorded in database		
Non-compliance	Description	
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 23-Nov-23 To: 07-May-24	14 additional items of load (2%) identified in the field audit. Potential impact: Low Actual impact: Low Audit history: Once previously Controls: Moderate Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as moderate as the accuracy of updates from the field could be improved. The impact on settlement and participants is minor; therefore, the audit risk rating is low.	
Actions taken to resolve the issue	Completion date	Remedial action status
CCC working to correct these discrepancies and improve communication process so these don't get missed	01.01.2025	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
No comments provided		

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 23-Nov-23</p> <p>To: 07-May-24</p>	<p>In absolute terms, total annual consumption is estimated to be 466.900 kWh lower than the DUMML database indicates.</p> <p>At least 14 items of load with incorrect coordinates.</p> <p>Nine metered items of load recorded against an unmetered ICP resulting in a very minor amount of over submission.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times 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 rated as weak because they do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Check meters have been installed, Simply and Smartco now to work together to capture the data from the check meters	01.08.2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
No comments provided		

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 24-Nov-23</p> <p>To: 06-May-24</p>	<p>In absolute terms, total annual consumption is estimated to be 466,900kWh lower than the DUMML database indicates.</p> <p>Estimated over submission of 443,543 kWh per annum based on dimming of 31,000 lamps.</p> <p>Over submission of approx. 25,489 kWh per annum due to incorrect monthly reporting.</p> <p>Nine metered items of load recorded against an unmetered ICP resulting in a very minor amount of over submission.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times 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 rated as weak because they do not mitigate risk to an acceptable level.</p> <p>The impact is assessed to be high, based on the kWh differences described above.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Check meters have been installed, Simply and Smartco now to work together to capture the data from the check meters	01.08.2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
No comments provided		