ELECTRICITY INDUSTRY PARTICIPATION CODE DISTRIBUTED UNMETERED LOAD AUDIT REPORT



For

WAKA KOTAHI OTAGO OTAGONET REGION AND MANAWA NZBN: 9429038917912

Prepared by: Steve Woods

Date audit commenced: 17 May 2024

Date audit report completed: 25 July 2024

Audit report due date: 28 July 2024

TABLE OF CONTENTS

Execu	cutive summary	3
	it summary	
	·	
	Non-compliances	
	Recommendations	5
	issues 5	
1.	Administrative	6
	1.1. Exemptions from Obligations to Comply with Code	6
	1.2. Structure of Organisation	
	1.3. Persons involved in this audit	7
	1.4. Hardware and Software	7
	1.5. Breaches or Breach Allegations	7
	1.6. ICP Data	7
	1.7. Authorisation Received	8
	1.8. Scope of Audit	8
	1.9. Summary of previous audit	
	1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)	10
2.	DUML database requirements	11
	2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)	11
	2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 1	
	2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)	12
	2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 1	.5.3)13
	2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)	
	2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)	14
	2.7. Audit trail (Clause 11(4) of Schedule 15.3)	15
3.	Accuracy of DUML database	17
	3.1. Database accuracy (Clause 15.2 and 15.37B(b))	17
	3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))	
Conc	clusion	21
	Participant response	23

EXECUTIVE SUMMARY

This audit of the **Waka Kotahi Otago (OtagoNet region)** DUML database and processes was conducted at the request of **Manawa Energy Limited (Manawa)** in accordance with clause 15.37B. The purpose of this audit is to verify that the volume information is being calculated accurately, and that profiles have been correctly applied.

The audit was conducted in accordance with the audit guidelines for DUML audits version 1.1.

There are three relevant ICPs, and the table below shows the status and source of the data for each ICP.

ICP	Status	Source of data
0001982578TGB34	Reconciled elsewhere	N/A
0001982403TG9B9	Active	Waitaki DC database
0001982641TG19E	Active	Spreadsheet containing historic information

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by Waitaki DC. Reporting is provided by Waitaki DC to Manawa on a monthly basis. The fieldwork is conducted by Network Waitaki for ICP 0001982403TG9B9, and Downer for the other ICP. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting.

Whilst the information for ICP 0001982403TG9B9 is currently in the Waitaki DC database, an NZTA database is in the process of being established for all of Otago and Southland and this database will include the lights currently recorded against ICPs 0001982403TG9B9 and 0001982641TG19E.

Manawa reconciles this DUML load using the STL profile. Submissions are based on the database information or historic information with on and off times derived from data logger information.

I recalculated the submissions for May 2024 using the data logger and the database information. I confirmed that it was calculated accurately based on the database and data logger information.

The table below shows the accuracy of the Waitaki DC database for ICP 0001982403TG9B9 and the spreadsheet for ICP 0001982641TG19E.

ICP	Database or spreadsheet wattage		Annual Impact on reconciliation
0001982403TG9B9	6,623	6,615	Over submission of 34 kWh
0001982641TG19E	862	2,077	Under submission by 5,189 kWh

The following discrepancies were found for ICP 0001982403TG9B9. The discrepancies identified during the previous audit have been corrected in the Waitaki DC database.

Discrepancy	Quantity
NZTA light with council ICP	0
Council light with NZTA ICP	0

Additional light	0
Not found in field	0
Incorrect wattage	1

The following discrepancies were found for ICP 0001982641TG19E.

Discrepancy	Quantity
NZTA lights not recorded in the spreadsheet or in the Central Otago DC database	15
Council light recorded as NZTA	0
Incorrect wattage	5

The audit found six non-compliances and makes no recommendations. The future risk rating of 16 indicates that the next audit be completed in six months, however the current data sources are likely to be replaced by an NZTA database for all of Otago and Southland within the next few months, therefore I recommend a 12 month audit period to allow for the new database to supersede the current one.

The matters raised are detailed below:

AUDIT SUMMARY

NON-COMPLIANCES

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Deriving submission information	2.1	Clause 11(1) of Schedule 15.3	Inaccurate database information leading to annual under submission of 5,155 kWh per annum. 15 lights were recorded against the incorrect ICP.	Weak	Low	3	Investigating
All load recorded in database	2.5	Clause 11(2A) of Schedule 15.3	15 additional lights in the field not in the database.	Weak	Low	3	Investigating
Tracking of load changes	2.6	Clause 11(3) of Schedule 15.3	The spreadsheet for ICP 0001982641TG19E does not track load changes in accordance with this clause.	Moderate	Low	2	Investigating
Audit trail	2.7	Clause 11(4) of Schedule 15.3	The spreadsheet for ICP 0001982641TG19E does not have an audit trail.	Moderate	Low	2	Investigating

Subject	Section	Clause	Non-Compliance	Controls	Audit Risk Rating	Breach Risk Rating	Remedial Action
Database accuracy	3.1	Clause 15.2 and 15.37B(b)	Inaccurate database information leading to annual under submission of 5,155 kWh per annum. 15 lights were recorded against the incorrect ICP	Weak	Low	3	Investigating
Volume information accuracy	3.2	Clause 15.2 and 15.37B(c)	Inaccurate database information leading to annual under submission of 5,155 kWh per annum. 15 lights were recorded against the incorrect ICP.	Weak	Low	3	Investigating
Future Risk Ra	Future Risk Rating						

Future risk rating	0	1-4	5-8	9-15	16-18	19+
Indicative audit frequency	36 months	24 months	18 months	12 months	6 months	3 months

RECOMMENDATIONS

Subject	Section	Recommendation
		Nil

ISSUES

Subject	Section	Description	Issue
		Nil	

1. ADMINISTRATIVE

1.1. Exemptions from Obligations to Comply with Code

Code reference

Section 11 of Electricity Industry Act 2010.

Code related audit information

Section 11 of the Electricity Industry Act provides for the Electricity Authority to exempt any participant from compliance with all or any of the clauses.

Audit observation

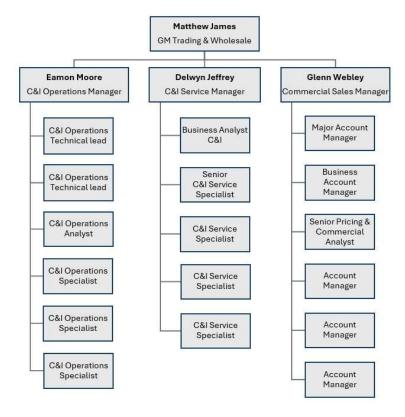
The Electricity Authority's website was reviewed to identify any exemptions relevant to the scope of this audit.

Audit commentary

There are no exemptions in place relevant to the scope of this audit.

1.2. Structure of Organisation

Manawa provided a copy of their organisational structure.



1.3. Persons involved in this audit

Auditors:

Name	Company	Role
Steve Woods	Veritek Limited	Lead Auditor

Other personnel assisting in this audit were:

Name	Title	Company
Eamon Moore	C&I Operations Manager	Manawa
Lisa Edge	Business Analyst – Commercial and Industrial	Manawa

1.4. Hardware and Software

The SQL database used for the management of DUML for ICP 0001982403TG9B9 is managed by Waitaki DC and is remotely hosted by thinkproject New Zealand Limited. The database is commonly known as "RAMM" which stands for "Road Assessment and Maintenance Management". The specific data used for DUML is held in the Streetlight tables. thinkproject New Zealand Limited backs up the database and assists with disaster recovery as part of their hosting service.

Access to the database is secure by way of password protection.

Systems used by the trader to calculate submissions are assessed as part of their reconciliation participant audits.

1.5. Breaches or Breach Allegations

There are no breach allegations relevant to the scope of this audit.

1.6. ICP Data

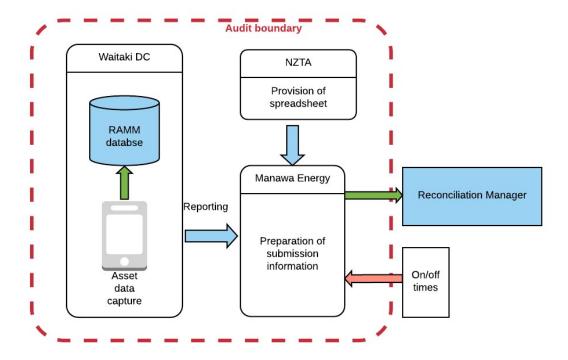
ICP Number	Description	NSP	Profile	Number of items of load	Database wattage (watts)
0001982578TGB34	Reconciled elsewhere.				
0001982403TG9B9	OtagoNet NZTA Waikouiti	HWB0331	STL	83	6,623
0001982641TG19E	OtagoNet NZTA Oturehua	NSY0331	STL	9	862

1.7. Authorisation Received

All information was provided directly by Manawa, Waitaki DC and NZ Streetlighting.

1.8. Scope of Audit

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by Waitaki DC. Reporting is provided by Waitaki DC to Manawa on a monthly basis. The fieldwork is conducted by Network Waitaki but there isn't a process to update the database. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting.



The field audit was undertaken of all items of load on 20 May 2024.

1.9. Summary of previous audit

The previous audit was completed in June 2023 by Steve Woods of Veritek Limited. The table below shows the status of the non-compliances.

Subject	Section	Clause	Non-Compliance	Status
Distributed unmetered load audits	1.10	16A.26 and 17.295F	Audit not conducted in accordance with the Code since 7 April 2016.	Cleared
Deriving submission information	2.1	Clause 11(1) of Schedule 15.3	Inaccurate database information leading to annual under submission of 4,946 kWh per annum. 15 lights were recorded against the incorrect ICP.	Still existing
All load recorded in database	2.5	Clause 11(2A) of Schedule 15.3	16 additional lights in the field not in the database.	Still existing
Tracking of load changes	2.6	Clause 11(3) of Schedule 15.3	The spreadsheet for ICP 0001982641TG19E does not track load changes in accordance with this clause.	Still existing
Audit trail	2.7	Clause 11(4) of Schedule 15.3	The spreadsheet for ICP 0001982641TG19E does not have an audit trail.	Still existing
Database accuracy	3.1	Clause 15.2 and 15.37B(b)	Inaccurate database information leading to annual under submission of 4,946 kWh per annum. 15 lights were recorded against the incorrect ICP.	Still existing
Volume information accuracy	3.2	Clause 15.2 and 15.37B(c)	Inaccurate database information leading to annual under submission of 4,946 kWh per annum. 15 lights were recorded against the incorrect ICP.	Still existing

1.10. Distributed unmetered load audits (Clause 16A.26 and 17.295F)

Code reference

Clause 16A.26 and 17.295F

Code related audit information

Retailers must ensure that DUML database audits are completed:

- 1. by 1 June 2018 (for DUML that existed prior to 1 June 2017)
- 2. within three months of submission to the reconciliation manager (for new DUML)
- 3. within the timeframe specified by the Authority for DUML that has been audited since 1 June 2017.

Audit observation

Manawa have requested Veritek to undertake this streetlight audit.

Audit commentary

The provision of this report confirms the database has been audited within the specified timeframe.

Audit outcome

Compliant

2. DUML DATABASE REQUIREMENTS

2.1. Deriving submission information (Clause 11(1) of Schedule 15.3)

Code reference

Clause 11(1) of Schedule 15.3

Code related audit information

The retailer must ensure the:

- DUML database is up to date
- methodology for deriving submission information complies with Schedule 15.5.

Audit observation

The process for calculation of consumption was examined.

Audit commentary

Manawa reconciles this DUML load using the STL profile. Submissions are based on the database and spreadsheet information with on and off times derived from data logger information.

I recalculated the submissions for May 2024 using the data logger and the database information. I confirmed that it was calculated accurately based on the database and data logger information.

Two issues are recorded in **section 3.1** which are relevant to this section, as follows:

- inaccurate database information leading to annual under submission of 5,155 kWh per annum, and
- 15 lights were recorded against the incorrect ICP.

It is expected that Manawa will resolve the accuracy issues for 14 months through the revision process.

Audit outcome

Non-compliance	Description
Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3	Inaccurate database information leading to annual under submission of 5,155 kWh per annum. 15 lights were recorded against the incorrect ICP. Potential impact: Medium Actual impact: Low Audit history: Once
From: 07-Apr-16	Controls: Weak
To: 29-Jun-23	Breach risk rating: 3
Audit risk rating	Rationale for audit risk rating
Low	The controls are rated as weak because there are no robust processes in place to ensure data is correct. The impact is assessed to be low, based on the kWh differences described in section 3.1.

Actions taken to resolve the issue	Completion date	Remedial action status
Manawa to work with Waka Kotahi to identify the lamps included on the wrong ICP and the inaccuracies in the DB. Once identified and updated in SLIM Manawa will complete 14 months of revision to rectify historic under submission.	04/10/2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Manawa to hold meeting with Waka Kotahi to discuss what additional preventive actions could be taken to increase accuracy of this DB.	01/11/2024	

2.2. ICP identifier and items of load (Clause 11(2)(a) and (aa) of Schedule 15.3)

Code reference

Clause 11(2)(a) and (aa) of Schedule 15.3

Code related audit information

The DUML database must contain:

- each ICP identifier for which the retailer is responsible for the DUML
- the items of load associated with the ICP identifier.

Audit observation

The database was checked to confirm an ICP is recorded for each item of load.

Audit commentary

All items of load had an ICP recorded as required by this clause.

Some ICP errors were present as recorded in section 3.1.

Audit outcome

Compliant

2.3. Location of each item of load (Clause 11(2)(b) of Schedule 15.3)

Code reference

Clause 11(2)(b) of Schedule 15.3

Code related audit information

The DUML database must contain the location of each DUML item.

Audit observation

The database was checked to confirm the location is recorded for all items of load.

Audit commentary

Street addresses and GPS coordinates are recorded for all items of load.

Audit outcome

Compliant

2.4. Description and capacity of load (Clause 11(2)(c) and (d) of Schedule 15.3)

Code reference

Clause 11(2)(c) and (d) of Schedule 15.3

Code related audit information

The DUML database must contain:

- a description of load type for each item of load and any assumptions regarding the capacity
- the capacity of each item in watts.

Audit observation

The database was checked to confirm that it contained a field for lamp type and wattage capacity and included any ballast or gear wattage and that each item of load had a value recorded in these fields.

Audit commentary

Lamp type description, lamp wattage and ballast wattage are included in the database. This was populated in the database for all items of load. The accuracy of this is examined in **section 3.1**.

Audit outcome

Compliant

2.5. All load recorded in database (Clause 11(2A) of Schedule 15.3)

Code reference

Clause 11(2A) of Schedule 15.3

Code related audit information

The retailer must ensure that each item of DUML for which it is responsible is recorded in this database.

Audit observation

The field audit was undertaken of all items of load on 20 May 2024.

Audit commentary

The field audit identified 15 additional items of load.

The accuracy of the database is discussed in **section 3.1**.

Audit outcome

Non-compliance	Des	cription		
Audit Ref: 2.5	15 additional lights in the field not in the database.			
With: Clause 11(2A) of	Potential impact: Medium			
Schedule 15.3	Actual impact: Low			
	Audit history: Once			
From: 01-Jul-24	Controls: Weak			
To: 26-May-24	Breach risk rating: 3			
Audit risk rating	Rationale for	audit risk rating		
Low	The controls for ensuring the Waitaki DC database is correct are recorded as moderate, but there are no controls in place to ensure data for ICP 0001982641TG19E is accurate, therefore the overall controls are rated as weak.			
	The impact is assessed to be low, based on the kWh differences described in section 3.1.			
Actions ta	Actions taken to resolve the issue Completion Remedial action status date			
Manawa to work with Waka Kotahi to identify the lamps included on the wrong ICP and the inaccuracies in the DB. Once identified and updated in SLIM Manawa will complete 14 months of revision to rectify historic under submission.		04/10/2024	Investigating	
Preventative actions taken to ensure no further issues will occur		Completion date		
Manawa to hold meeting with Waka Kotahi to discuss what additional preventive actions could be taken to increase accuracy of this DB.		01/11/2024		

2.6. Tracking of load changes (Clause 11(3) of Schedule 15.3)

Code reference

Clause 11(3) of Schedule 15.3

Code related audit information

The DUML database must track additions and removals in a manner that allows the total load (in kW) to be retrospectively derived for any given day.

Audit observation

The process for tracking of changes in the database was examined.

Audit commentary

The RAMM database functionality achieves compliance with the code.

The spreadsheet for ICP 0001982641TG19E does not track load changes in accordance with this clause.

Audit outcome

Non-compliant

Non-compliance	Des	cription	
Audit Ref: 2.6 With: Clause 11(3) of	The spreadsheet for ICP 0001982641TG19E does not track load changes in accordance with this clause.		
Schedule 15.3	Potential impact: Medium		
	Actual impact: Low		
	Audit history: Once		
From: 01-Jul-23	Controls: Moderate		
To: 26-May-24	Breach risk rating: 2		
Audit risk rating	Rationale for	audit risk rating	
Low	The controls are recorded as strong for ICP 0001982403TG9B9 but there are no processes in place for ICP 0001982641TG19E, therefore the controls are moderate overall. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Manawa to hold meeting with Waka Kotahi to discuss how we can include light change/ addition/removal dates to this ICP so that it can be ingested into SLIM.			
Preventative actions taken to ensure no further issues will Completion occur date			
Manawa to hold meeting with Waka Kotahi to discuss what additional preventive actions could be taken to increase accuracy of this DB.			

2.7. Audit trail (Clause 11(4) of Schedule 15.3)

Code reference

Clause 11(4) of Schedule 15.3

Code related audit information

The DUML database must incorporate an audit trail of all additions and changes that identify:

- the before and after values for changes
- the date and time of the change or addition
- the person who made the addition or change to the database

Audit observation

The database was checked for audit trails.

Audit commentary

RAMM has a complete audit trail of all additions and changes to the database information for ICP 0001982403TG9B9 but the spreadsheet for ICP 0001982641TG19E does not have an audit trail.

Audit outcome

Non-compliance	Des	cription	
Audit Ref: 2.7 With: Clause 11(4) of	The spreadsheet for ICP 0001982641TG Potential impact: Medium	19E does not hav	e an audit trail.
Schedule 15.3	Actual impact: Low		
From: 01-Jul-23	Audit history: Once Controls: Moderate		
To: 26-May-24	Breach risk rating: 2		
Audit risk rating	Rationale for	audit risk rating	
Low	The controls are recorded as strong for ICP 0001982403TG9B9 but there is no process in place for ICP 0001982641TG19E, therefore the controls are moderate overall. The impact on settlement and participants is minor; therefore, the audit risk rating is low.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
	Manawa to hold meeting with Waka Kotahi to discuss how we can get the DB for this ICP into RAMM. Investigating		
Preventative actions taken to ensure no further issues will Completion date			
Manawa to hold meeting with Waka Kotahi to discuss what additional preventive actions could be taken to increase accuracy of this DB.			

3. ACCURACY OF DUML DATABASE

3.1. Database accuracy (Clause 15.2 and 15.37B(b))

Code reference

Clause 15.2 and 15.37B(b)

Code related audit information

Audit must verify that the information recorded in the retailer's DUML database is complete and accurate.

Audit observation

A 100% field audit was conducted.

Wattages were checked for alignment with the published standardised wattage table produced by the Electricity Authority against the database or in the case of LED lights against the LED light specification.

The change management process and timeliness of database updates was evaluated.

Audit commentary

The table below shows the accuracy of the Waitaki DC database for ICP 0001982403TG9B9 and the spreadsheet for ICP 0001982641TG19E.

ICP	Database or spreadsheet wattage	Field wattage	Annual Impact on reconciliation
0001982403TG9B9	6,623	6,615	Over submission of 34 kWh
0001982641TG19E	862	2,077	Under submission by 5,189 kWh

The following discrepancies were found for ICP 0001982403TG9B9. The discrepancies identified during the previous audit have been corrected in the Waitaki DC database.

Discrepancy	Quantity
NZTA light with council ICP	0
Council light with NZTA ICP	0
Additional light	0
Not found in field	0
Incorrect wattage	1

The following discrepancies were found for ICP 0001982641TG19E.

Discrepancy	Quantity
NZTA lights not recorded in the spreadsheet or in the Central Otago DC database	15
Council light recorded as NZTA	0
Incorrect wattage	5

During the previous audit, I checked the data against the contents of the proposed NZTA database with Kara Atkinson from NZ Streetlighting. Veritek's findings match those of NZ Streetlighting, and it appears the new database will contain accurate data with regard to these two ICPs.

When the NZTA database is ready to use, both Central Otago DC and Waitaki DC will need to relabel the items of load currently assigned to NZTA, so there is no risk of double submission. For example, the highway through Ranfurly has 32 lights, 17 of which are in the CODC database but 15 are not in any database. The 17 in the CODC database will need to be relabelled.

Lamp description and capacity accuracy

Wattages for all items of load were checked against the published standardised wattage table produced by the Electricity Authority in the database and found all wattages were correct.

ICP Accuracy

As shown in the table above, 15 lights were recorded against the incorrect ICP.

Change management process findings

The Otagonet region is managed by Downer. Database updates from the field are provided to Downer by the field contractor and Downer populates RAMM.

Audit outcome

Non-compliance	Description		
Audit Ref: 3.1 With: Clause 15.2 and	Inaccurate database information leading to annual under submission of 5,155 kWh per annum.		
15.37B(b)	15 lights were recorded against the incorrect ICP.		
	Potential impact: Medium		
	Actual impact: Low		
	Audit history: Once		
From: 01-Jul-23	Controls: Weak		
To: 26-May-24	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls for ensuring the Waitaki DC database is correct are recorded as moderate, but there are no controls in place to ensure data for ICP 0001982641TG19E is accurate, therefore the overall controls are rated as weak.		
	The impact is assessed to be low, based	on the kWh differ	ences described above.
Actions to	Actions taken to resolve the issue Completion Remedial action sta		
Manawa to work with Waka Kotahi to identify the lamps included on the wrong ICP and the inaccuracies in the DB. Once identified and updated in SLIM Manawa will complete 14 months of revision to rectify historic under submission.		04/10/2024	Investigating
Preventative actions take	en to ensure no further issues will occur	Completion date	

Manawa to hold meeting with Waka Kotahi to discuss what additional preventive actions could be taken to increase accuracy of this DB.	01/11/2024	

3.2. Volume information accuracy (Clause 15.2 and 15.37B(c))

Code reference

Clause 15.2 and 15.37B(c)

Code related audit information

The audit must verify that:

- volume information for the DUML is being calculated accurately
- profiles for DUML have been correctly applied.

Audit observation

The submission was checked for accuracy for the month the database extract was supplied. This included:

- checking the registry to confirm that all ICPs have the correct profile and submission flag, and
- checking the database extract combined with the burn hours against the submitted figure to confirm accuracy.

Audit commentary

Manawa reconciles this DUML load using the STL profile. Submissions are based on the database and spreadsheet information with on and off times derived from data logger information.

I recalculated the submissions for May 2024 using the data logger and the database information. I confirmed that it was calculated accurately based on the database and data logger information.

Two issues are recorded in **section 3.1** which are relevant to this section, as follows:

- inaccurate database information leading to annual under submission of 5,155 kWh per annum,
 and
- 15 lights were recorded against the incorrect ICP.

It is expected that Manawa will resolve the accuracy issues for 14 months through the revision process.

Audit outcome

Non-compliance	Des	cription	
Audit Ref: 3.2 With: Clause 15.2 and	Inaccurate database information leading to annual under submission of 5,155 kWh per annum.		
15.37B(c)	15 lights were recorded against the incorrect ICP.		
	Potential impact: Medium		
	Actual impact: Low		
	Audit history: Once		
From: 01-Jul-23	Controls: Weak		
To: 26-May-24	Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are rated as weak because there are no robust processes in place to ensure data is correct.		
	The impact is assessed to be low, based 3.1.	on the kWh differ	ences described in section
Actions to	aken to resolve the issue	Completion date	Remedial action status
Manawa to work with Waka Kotahi to identify the lamps included on the wrong ICP and the inaccuracies in the DB. Once identified and updated in SLIM Manawa will complete 14 months of revision to rectify historic under submission.		04/10/2024	Investigating
Preventative actions take	en to ensure no further issues will occur	Completion date	
	with Waka Kotahi to discuss what ons could be taken to increase accuracy	01/11/2024	

CONCLUSION

There are three relevant ICPs, and the table below shows the status and source of the data for each ICP.

ICP	Status	Source of data
0001982578TGB34	Reconciled elsewhere	N/A
0001982403TG9B9	Active	Waitaki DC database
0001982641TG19E	Active	Spreadsheet containing historic information

The database is remotely hosted by thinkproject New Zealand Ltd and is managed by Waitaki DC. Reporting is provided by Waitaki DC to Manawa on a monthly basis. The fieldwork is conducted by Network Waitaki for ICP 0001982403TG9B9, and Downer for the other ICP. The scope of the audit encompasses the collection, security and accuracy of the data, including the preparation of submission information based on the database reporting.

Whilst the information for ICP 0001982403TG9B9 is currently in the Waitaki DC database, an NZTA database is in the process of being established for all of Otago and Southland and this database will include the lights currently recorded against ICPs 0001982403TG9B9 and 0001982641TG19E.

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Discrepancy	Quantity
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Council light with NZTA ICP	0
Additional light	0
Not found in field	0
Incorrect wattage	1

The following discrepancies were found for ICP 0001982641TG19E.

Discrepancy	Quantity
NZTA lights not recorded in the spreadsheet or in the Central Otago DC database	15
Council light recorded as NZTA	0
Incorrect wattage	5

The audit found six non-compliances and makes no recommendations. The future risk rating of 16 indicates that the next audit be completed in six months, however the current data sources are likely to be replaced by an NZTA database for all of Otago and Southland within the next few months, therefore I recommend a 12 month audit period to allow for the new database to supersede the current one.

Participant response

Manawa acknowledges that historically this DUML database has had some issues with accuracy and the same issues have appeared again this audit, we have been working with Waka Kotahi to improve DUML submission in the Otago region and are hopeful that an amalgamation of the region into one RAMM database will happen this year. Manawa will organise a meeting with Waka Kotahi to discuss these findings so that we can identify the best way forward to improve its accuracy; particularly with the management of ICP 0001982641TG19E. We are comfortable with Veritek's decision on the proposed audit frequency and will endeavour to make meaningful changes in this DB before the next audit date.