

Compliance plan for Gisborne DC and Mercury 2024

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1</p> <p>With: Clause 11(1) of schedule 15.3</p> <p>From: 01-Sep-23</p> <p>To: 19-Jul-24</p>	<p>The field audit identified annual under submission of 106,400 kWh.</p> <p>HHR profile used without an exemption.</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 although there are sound processes in place to identify business as usual changes, the LED rollout appears to be causing some database inaccuracy.</p> <p>The impact is assessed to be high because the impact on submission is greater than 50,000 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>We are in the process of drafting applications for DUML profiles that allow us to submit as HHR, we will submit to the EA as soon as possible. August/September 2024.</p> <p>Gisborne DC advised that they believe the inaccuracies in the database are due to bulk update done that contained inaccurate information, they are planning to do a tidy up with an ETA on completion of end of August 2024.</p>	August/September 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with Gisborne DC on ensuring database accuracy.	Ongoing	

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-Sep-23</p> <p>To: 19-Jul-24</p>	<p>Two additional lights identified in the field.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Three times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 2</p>	
Audit risk rating	Rationale for audit risk rating	
Low	<p>The controls are rated as moderate because they mitigate risk most of the time.</p> <p>The impact is assessed to be low as the number of lights missing from the database is small.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Gisborne DC are in the process of doing a tidy up of the database with an ETA on completion of end of August 2024. We have highlighted regarding these 2 lights to them.	August/September 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with Gisborne DC on ensuring database accuracy.	Ongoing	

Database accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 01-Sep-21</p> <p>To: 13-Jul-23</p>	<p>Inaccurate database leading to under submission of approx. 106,400 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: Multiple times</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 although there are sound processes in place to identify business as usual changes, the LED rollout appears to be causing some database inaccuracy.</p> <p>The impact is assessed to be high because the impact on submission is greater than 50,000 kWh per annum.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
Gisborne DC advised that they believe the inaccuracies in the database are due to bulk update done that contained inaccurate information, they are planning to do a tidy up with an ETA on completion of end of August 2024.	August/September 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with Gisborne DC on ensuring database accuracy.	Ongoing	

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-Sep-23</p> <p>To: 19-Jul-24</p>	<p>The field audit identified annual under submission of 106,400 kWh.</p> <p>HHR profile used without an exemption.</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 although there are sound processes in place to identify business as usual changes, the LED rollout appears to be causing some database inaccuracy.</p> <p>The impact is assessed to be high because the impact on submission is greater than 50,000 kWh per annum.</p>	
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Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with Gisborne DC on ensuring database accuracy.	Ongoing	