

# Compliance plan for Mercury Central Hawkes Bay District Council, DUML, 2024

Distributed unmetered load audits		
Non-compliance	Description	
Audit Ref: 1.10 With: Clause 16A.26  From: 01-Jun-24 To: 12-Aug-24	DUML audit not completed within the required timeframe. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
<b>Low</b>	The controls are recorded as strong as Mercury has robust controls around managing the audit process. The impact is assessed as low as the audit report has now been completed.	
Actions taken to resolve the issue	Completion date	Remedial action status
The delay was caused by our inability to source logger data. The audit couldn't be completed until we could provide submission info, and we couldn't complete a submission until we were able to get logger data. As always, we've learnt a few things on this one which should help us to avoid recurrence should a new DUML customer where the source for logger data is not immediately obvious switch to Mercury in the future.	Completed	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
As above.	Ongoing.	

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-Mar-24</p> <p>To: 10-Aug-24</p>	<p>HHR profile used without an exemption.</p> <p>No volumes submitted from March 2024 to July 2024.</p> <p>The monthly wattage report is used as a snapshot and does not take into account changes made during the month.</p> <p>Potential impact: Low</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 are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is assessed as medium due to the volumes not submitted from March 2024 to July 2024.</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.</p> <p>The unsubmitted volumes will be washed up in coming months.</p> <p>We are focusing on resolving the 'snapshot' issue in general and are having internal discussions before liaising with customers to provide any direction.</p>	August/September 2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above.	Ongoing.	

Location of each item of load		
Non-compliance	Description	
Audit Ref: 2.3 With: Clause 11(2)(b) of schedule 15.3 From: 24-May-22 To: 17-Apr-24	Insufficient information to locate three items of load. 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 recorded as strong as they are sufficient to mitigate risk to an acceptable level. 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
CHBDC are liaising with Pope Electrical (who maintain the RAMM database information) to correct this.	August/September 2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to work with CHBDC to ensure 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-Mar-24</p> <p>To: 10-Aug-24</p>	<p>HHR profile used without an exemption.</p> <p>No volumes submitted from March 2024 to July 2024.</p> <p>The monthly wattage report is used as a snapshot and does not take into account changes made during the month.</p> <p>Potential impact: Low</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 are recorded as moderate because they mitigate risk most of the time but there is room for improvement.</p> <p>The impact is assessed as medium due to the volumes not submitted from March 2024 to July 2024.</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.</p> <p>The unsubmitted volumes will be washed up in coming months.</p> <p>We are focusing on resolving the 'snapshot' issue in general and are having internal discussions before liaising with customers to provide any direction.</p>	August/September 2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
As above.	Ongoing.	