

Compliance plan for Genesis and NZTA Bay of Plenty 2024

Distributed unmetered load audits		
Non-compliance	Description	
<p>Audit Ref: 1.10</p> <p>With: Clause 16A.26 and 17.295F</p> <p>From: 15-Dec-18</p> <p>To: 30-Jul-24</p>	<p>Audit overdue for two of the three previous databases.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 6</p>	
Audit risk rating	Rationale for audit risk rating	
<p>High</p>	<p>Genesis has been the trader for two of the previous databases since 1 February 2024 and since 2016 for the BOP East database. Genesis has been waiting for NZTA to combine the databases so there is an auditable set of data. The controls are recorded as moderate, because they address risk most of the time.</p> <p>The audit risk rating is high because of the impact on annual kWh, which could have been resolved earlier if the audit was conducted earlier.</p>	
Actions taken to resolve the issue	Completion date	Remedeial action status
<p>Genesis has been waiting for NZTA to combine the databases and as a result of this it has caused a delay in the audit being carried out after the audit due date.</p> <p>NZTA have now combined the databases and we have been receiving regular monthly data snapshots.</p>	<p>April 2024</p>	<p>Cleared</p>
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>NZTA are now providing regular monthly datasets, this has resolved in future delays due to no database/datasets being provided</p>	<p>April 2024</p>	

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 15-Dec-18 To: 30-Jul-24</p>	<p>Submission did not match the database for four of 11 ICPs leading to over submission of 794 kWh for June 2024.</p> <p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated over submission of 116,700 kWh per annum.</p> <p>Potential impact: High Actual impact: High Audit history: None Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Genesis has been the trader for two of the previous databases since 1 February 2024 and since 2016 for the BOP East database. Genesis has been waiting for NZTA to combine the databases so there is an auditable set of data. The controls are recorded as weak, because they do not ensure the database is accurate to support accurate submission.</p> <p>The audit risk rating is high because of the impact on annual kWh.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis continues to work with NZTA to increase the accuracy of their database. They are aware that it has been recommended that a 100% field audit would resolve any inaccuracies.</p> <p>Genesis has taken steps to resolve the profile issues in moving our DUML ICP's to the GSL/UNM profile and this work is still currently ongoing. Genesis is currently investigating the use of the UNM profile and the discrepancies' that have been identified between the registry & RAMM data and also the field audit findings.</p>	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to investigate the UNM/GSL profile use and ensure the correct profile is in use and also that the correct submission data is being submitted.		

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) and (d) of Schedule 15.3 From: 15-Dec-18 To: 30-Jul-24	Three additional items of load found in the field. Potential impact: High Actual impact: Low Audit history: None Controls: Moderate Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as moderate because they mitigate risk most of the time but there is room for improvement. 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
Genesis continues to work closely with NZTA to increase and maintain the accuracy of their database. NZTA are aware of the field findings for these to be updated in their database.		Continuous Improvement	
Preventative actions taken to ensure no further issues will occur		Completion date	
Field findings are with NZTA to be investigated and updated appropriately in their database		Proposed or actual date	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 15-Dec-18</p> <p>To: 30-Jul-24</p>	<p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated over submission of 116,700 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>		
Audit risk rating	Rationale for audit risk rating		
High	<p>Genesis has been the trader for two of the previous databases since 1 February 2024 and since 2016 for the BOP East database. Genesis has been waiting for NZTA to combine the databases so there is an auditable set of data. The controls are recorded as weak, because the processes for updating the database does not ensure the data is accurate.</p> <p>The audit risk rating is high because of the impact on annual kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Genesis is now receiving consistent monthly RAMM data extracts. NZTA is aware that due to untimely or non-updates, this is causing ongoing data discrepancies in the RAMM database.</p> <p>Genesis continues to work with NZTA to ensure a robust process is established to ensure any changes on the network are being updated accurately and in a timely manner.</p> <p>NZTA are aware that a 100% field audit would resolve the current discrepancies to allow a robust process to be effect moving forward.</p>		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Genesis continues to work with NZTA to ensure a robust process is established to ensure any changes on the network are being updated accurately and in a timely manner.</p>		Continuous Improvement	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 15-Dec-18</p> <p>To: 30-Jul-24</p>	<p>Submission did not match the database for four of 11 ICPs leading to over submission of 794 kWh for June 2024.</p> <p>The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated over submission of 116,700 kWh per annum.</p> <p>Potential impact: High</p> <p>Actual impact: High</p> <p>Audit history: None</p> <p>Controls: Weak</p> <p>Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	<p>Genesis has been the trader for two of the previous databases since 1 February 2024 and since 2016 for the BOP East database. Genesis has been waiting for NZTA to combine the databases so there is an auditable set of data. The controls are recorded as weak, because they do not ensure the database is accurate to support accurate submission.</p> <p>The audit risk rating is high because of the impact on annual kWh.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Genesis is now receiving consistent monthly RAMM data extracts. NZTA is aware that due to untimely or non-updates, this is causing ongoing data discrepancies in the RAMM database.</p> <p>Genesis continues to work with NZTA to ensure a robust process is established to ensure any changes on the network are being updated accurately and in a timely manner.</p> <p>NZTA are aware that a 100% field audit would resolve the current discrepancies to allow a robust process to be effect moving forward.</p>	Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
Genesis continues to work with NZTA to ensure a robust process is established to ensure any changes on the network are being updated accurately and in a timely manner.	Continuous Improvement	