

Compliance Plan for Genesis Energy - Tasman DC DUML 2024

Deriving submission information		
Non-compliance	Description	
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 01-May-24 To: 21-Jul-24</p>	<p>The field audit found that the database accuracy was not accurate within $\pm 5.0\%$, which could result in estimated under submission of 102,900 kWh per annum.</p> <p>Up to 60 items of unmetered load (2,596 W or 11,087.5 kWh per annum) have a blank ICP number. Investigation is being completed to confirm whether these items are genuinely unmetered and update RAMM.</p> <p>170 items of load which are expected to have a non-zero gear wattage have no gear wattage. An expected 2,271 W or 9,699.4 kWh per annum of gear wattage is missing from the database.</p> <p>92 items of load have missing lamp wattages and/or descriptions in the database. Based on an average of 44W per light across the whole database this could lead to under submission of 4,073W or 17,398 kWh per annum.</p> <p>Four lights had an unusual wattage for their lamp type and are highly likely to have either an incorrect description or wattage.</p> <p>The previous audit found four lamps in a new subdivision at Summerfield Boulevard that had 13W LED recorded in the database but were labelled as 28W LEDs (GIS access codes 15096, 15106, 15117 and 15121). These remain incorrect and could result in estimated under submission of 64 kWh per annum.</p> <p>The database extract is provided as a snapshot, and daily changes are not reflected in the submission data.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times previously Controls: Weak Breach risk rating: 9</p>	
Audit risk rating	Rationale for audit risk rating	
High	The controls are weak because the database is not accurate within $\pm 5.0\%$, indicating that changes may not be accurately captured. The impact is high based on the potential kWh impact.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TDC have begun using RAMM which has lead to database inconsistencies resulting in missing ICP numbers, lamp & gear wattages and a decline in field audit accuracy.</p> <p>Genesis has been working closely with TDC as there was a period where we were not receiving monthly data extracts and these started being provided again since May 2024.</p> <p>TDC are investigating the discrepancies identified to have these corrected in their data system.</p>	Continuous Improvement	Investigating

Preventative actions taken to ensure no further issues will occur	Completion date
Monthly data extracts have started being provided since May 2024	Continuous Improvement

ICP identifier and items of load		
Non-compliance	Description	
<p>Audit Ref: 2.2</p> <p>With: Clause 11(2)(a) and (aa) of Schedule 15.3</p> <p>From: 15-Jul-24</p> <p>To: 15-Jul-24</p>	<p>Up to 60 items of unmetered load (2,596 W or 11,087.5 kWh per annum) have a blank ICP number. Investigation is being completed to confirm whether these items are genuinely unmetered and update RAMM.</p> <p>Potential impact: Medium</p> <p>Actual impact: Unknown</p> <p>Audit history: None</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	The controls are moderate because most items of load have a DUML ICP recorded. The impact is medium based on the potential kWh impact.	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>TDC have begun using RAMM which has lead to database inconsistencies resulting in missing ICP numbers, lamp & gear wattages and a decline in field audit accuracy.</p> <p>Genesis has been working closely with TDC as there was a period where we were not receiving monthly data extracts and these started being provided again since May 2024.</p> <p>TDC are investigating the discrepancies identified to have these corrected in their data system.</p>	Continuous Improvement	Investigating
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Monthly data extracts have started being provided since May 2024	Continuous Improvement	

Description and capacity of load	
Non-compliance	Description
<p>Audit Ref: 2.4</p> <p>With: Clause 11(2)(c) and (d) of Schedule 15.3</p>	<p>170 items of load which are expected to have a non-zero gear wattage have no gear wattage. An expected 2,271 W or 9,699.4 kWh per annum of gear wattage is missing from the database.</p> <p>92 items of load have missing lamp wattages and/or descriptions in the database. Based on an average of 44W per light across the whole database this could lead to under submission of 4,073W or 17,398 kWh per annum.</p> <p>Potential impact: Low</p>

From: 02-Jul-24 To: 21-Jul-24	Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are weak because gear wattages are not recorded and 92 items of load do not have make, model or wattage information recorded. The impact is medium based on the estimated missing wattages.		
Actions taken to resolve the issue		Completion date	Remedial action status
TDC have begun using RAMM which has lead to database inconsistencies resulting in missing ICP numbers, lamp & gear wattages and a decline in field audit accuracy. Genesis has been working closely with TDC as there was a period where we were not receiving monthly data extracts and these started being provided again since May 2024. TDC are investigating the discrepancies identified to have these corrected in their data system.		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Monthly data extracts have started being provided since May 2024		Continuous Improvement	

All load recorded in the database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of schedule 15.3 From: 19-Jul-24 To: 21-Jul-24	The field audit found an additional 25 lights (estimated 742 W) in the field which were not recorded in the database. This could lead to under submission of 3169 kWh per annum. Potential impact: Low Actual impact: Low Audit history: None Controls: Weak Breach risk rating: 3		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are recorded as weak because database accuracy is not within $\pm 5.0\%$, indicating that changes may not be being accurately captured. The impact is assessed to be low based on the potential kWh impact.		
Actions taken to resolve the issue		Completion date	Remedial action status
TDC have begun using RAMM which has lead to database inconsistencies resulting in missing ICP numbers, lamp & gear wattages and a decline in field audit accuracy.		Continuous Improvement	Investigating

Genesis has been working closely with TDC as there was a period where we were not receiving monthly data extracts and these started being provided again since May 2024. TDC are investigating the discrepancies identified to have these corrected in their data system.		
Preventative actions taken to ensure no further issues will occur	Completion date	
Monthly data extracts have started being provided since May 2024	Continuous Improvement	

Database accuracy	
Non-compliance	Description
<p>Audit Ref: 3.1 With: Clause 15.2 and 15.37B(b)</p> <p>From: 02-Jul-24 To: 21-Jul-24</p>	<p>The field audit found that the database accuracy was not accurate within $\pm 5.0\%$, which could result in estimated under submission of 102,900 kWh per annum.</p> <p>170 items of load which are expected to have a non-zero gear wattage have no gear wattage. An expected 2,271 W or 9,699.4 kWh per annum of gear wattage is missing from the database.</p> <p>92 items of load have missing lamp wattages and/or descriptions in the database. Based on an average of 44W per light across the whole database this could lead to under submission of 4,073W or 17,398 kWh per annum.</p> <p>Four lights had an unusual wattage for their lamp type and are likely to have either an incorrect description or wattage.</p> <p>The previous audit found four lamps in a new subdivision at Summerfield Boulevard that had 13W LED recorded in the database but were labelled as 28W LEDs (GIS access codes 15096, 15106, 15117 and 15121). These remain incorrect and could result in estimated under submission of 64 kWh per annum. All lights on Summerfield Boulevard are recorded as 20, 23, 27.5, 28 or 67 W in RAMM.</p> <p>Up to 60 items of unmetered load (2,596 W or 11,087.5 kWh per annum) have a blank ICP number. Investigation is being completed to confirm whether these items are genuinely unmetered and update RAMM.</p> <p>Two lights on Cropp Place, Richmond (light IDs 934 and 935) had correct GPS coordinates, but the street name was incorrectly recorded as Coutts Place, Mapua.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times previously Controls: Weak Breach risk rating: 9</p>
Audit risk rating	Rationale for audit risk rating
High	The controls are weak because the database is not accurate within $\pm 5.0\%$, indicating that changes may not be being accurately captured. The impact is assessed to be high based on the potential kWh impact.

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<p>TDC have begun using RAMM which has lead to database inconsistencies resulting in missing ICP numbers, lamp & gear wattages and a decline in field audit accuracy.</p> <p>Genesis has been working closely with TDC as there was a period where we were not receiving monthly data extracts and these started being provided again since May 2024.</p> <p>TDC are investigating the discrepancies identified to have these corrected in their data system.</p>	Continuous Improvement	Investigating
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Volume information accuracy	
Non-compliance	Description
<p>Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)</p> <p>From: 01-May-24 To: 21-Jul-24</p>	<p>The field audit found that the database accuracy was not accurate within $\pm 5.0\%$, which could result in estimated under submission of 102,900 kWh per annum.</p> <p>Up to 60 items of unmetered load (2,596 W or 11,087.5 kWh per annum) have a blank ICP number. Investigation is being completed to confirm whether these items are genuinely unmetered and update RAMM.</p> <p>170 items of load which are expected to have a non-zero gear wattage have no gear wattage. An expected 2,271 W or 9,699.4 kWh per annum of gear wattage is missing from the database.</p> <p>92 items of load have missing lamp wattages and/or descriptions in the database. Based on an average of 44W per light across the whole database this could lead to under submission of 4,073W or 17,398 kWh per annum.</p> <p>Four lights had an unusual wattage for their lamp type and are highly likely to have either an incorrect description or wattage.</p> <p>The previous audit found four lamps in a new subdivision at Summerfield Boulevard that had 13W LED recorded in the database but were labelled as 28W LEDs (GIS access codes 15096, 15106, 15117 and 15121). These remain incorrect and could result in estimated under submission of 64 kWh per annum.</p> <p>The database extract is provided as a snapshot, and daily changes are not reflected in the submission data.</p> <p>Potential impact: High Actual impact: Unknown Audit history: Multiple times previously Controls: Weak Breach risk rating: 9</p>
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