## Compliance plan for Kawerau DC DUML 2024

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	Festive lighting is connected but the volume is not recorded.		
Clause 11(1) of schedule 15.3	Some ballast wattage discrepancies leading to under submission of 316 kWh per annum.		
	Over submission of 6,200 kWh per annum identified by the field audit.		
	Corrections not made after the previous two audits.		
	Potential impact: High		
	Actual impact: Medium		
	Audit history: Multiple times		
From: 01-Feb-24	Controls: Weak		
To: 08-Aug-24	Breach risk rating: 6		
Audit risk rating	Rationale fo	r audit risk rating	
Medium	The controls are recorded as weak because they are not sufficient to ensure all lights are accurately recorded in the database, and there are still outstanding corrections to be made from the last two audits. The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Kawerau DC have gone through vacancy constraints and changes in their roles, which have now all be filled.		Continuous Improvement	Investigating
Kawerau DC are aware that there are outstanding field findings from the previous audit that are still needing to be updated and they will endeavour to have these urgently updated in their system, along with the current audit field findings. They will notify Steve when the corrections have been made.			
Kawerau DC are looking into the permissions to allow their techs to update changes in field, directly into RAMM to avoid any delays in changes being updated.			
Preventative actions ta	aken to ensure no further issues will occur	Completion date	
Vacancies at Kawerau have now been filled which has caused some constraints in some of the actions not being completed.		Continuous Improvement	

ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2	Three items of load without an ICP recorded.		
With: Clause 11(2)(a)	Potential impact: Low		
and (aa) of schedule 15.3	Actual impact: Low		
	Audit history: None		
From: 01-Feb-24	Controls: Moderate		
To: 08-Aug-24	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 particip rating is low.	pants is minor; the	erefore, the audit risk
Actions taken to resolve the issue		Completion date	Remedial action status
Kawerau DC confirmed these are likely in the system incorrectly and were not removed resulting in them being in the system without an ICP listed. Kawerau will confirm this is correct and have them removed from the system.		Continuous Improvement	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
Kawerau will investigate if these should be removed from their system		Continuous Improvement	

All load recorded in database				
Non-compliance	Description			
Audit Ref: 2.5	Six additional lights in the field.			
With: Clause 11(2A) of	Potential impact: Low			
Schedule 15.3	Actual impact: Low			
France 04 Fab 24	Audit history: Twice			
From: 01-Feb-24	Controls: Weak			
To: 08-Aug-24	Breach risk rating: 3			
Audit risk rating	Rationale fo	r audit risk rating		
Low	The controls are recorded as weak because they are not sufficient to ensure all lights are recorded in the database, and there are still outstanding corrections to be made from the last two audits.			
	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	
Kawerau DC are aware that there are outstanding field findings from the previous audit that are still needing to be updated and they will endeavour to have these urgently updated in their system, along with the current audit field findings. They will notify Steve when the corrections have been made.		Continuous Improvement	Investigating	
Kawerau DC are looking into the permissions to allow their techs to update changes in field, directly into RAMM to avoid any delays in changes being updated.				
Preventative actions taken to ensure no further issues will occur		Completion date		
Vacancies at Kawerau have now been filled which has caused some constraints in some of the actions not being completed.		Continuous Improvement		

Database accuracy			
Non-compliance	Description		
Audit Ref: 3.1	Festive lighting is connected but the volume is not recorded.		
With: Clause 15.2 and 15.37B(b)	Some ballast wattage discrepancies leading to under submission of 316 kWh per annum.		
	Over submission of 6,200 kWh per annum identified by the field audit.		
	Corrections not made after the previous two audits.		
	Three items of load without ICPs.		
	Potential impact: High		
	Actual impact: Medium		
	Audit history: Multiple times		
From: 01-Sep-22	Controls: Weak		
To: 08-Aug-24	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as weak because they are not sufficient to ensure all lights are accurately recorded in the database, and there are still outstanding corrections to be made from the last two audits. The impact is assessed to be medium, based on the kWh differences described above.		
Actions ta	ken to resolve the issue	Completion date	Remedial action status
Kawerau DC have gone through vacancy constraints and changes in their roles, which has now all been filled however it has caused some issues in actions being taken.		Continuous Improvement	Investigating
As the roles have now been billed, this will be reviewed to ensure that there is a robust new connection in place.			
Kawerau DC have been made aware of the festive lights not being provided in the data and are aware of the expectations that these need to be recorded.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Vacancies at Kawerau have now been filled which has caused some constraints in some of the actions not being completed.		Continuous Improvement	

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2	Festive lighting is connected but the volume is not recorded.		
Clause 15.2 and 15.37B(c)	Some ballast wattage discrepancies leading to under submission of 316 kWh per annum.		
	Over submission of 6,200 kWh per annum identified by the field audit.		
	Corrections not made after the previous two audits.		
	Potential impact: High		
	Actual impact: Medium		
	Audit history: Multiple times		
From: 01-Feb-24	Controls: Weak		
To: 08-Aug-24	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are recorded as weak because they are not sufficient to ensure all lights are accurately recorded in the database, and there are still outstanding corrections to be made from the last two audits.		
	The impact is assessed to be medium, based on the kWh differences described above.		
Actions taken to resolve the issue		Completion date	Remedial action status
Kawerau DC have gone through vacancy constraints and changes in their roles, which has now all been filled however it has caused some issues in actions being taken.		Continuous Improvement	Investigating
As the roles have now been billed, this will be reviewed to ensure that there is a robust new connection in place.			
Kawerau DC have been made aware of the festive lights not being provided in the data and are aware of the expectations that these need to be recorded.			
Preventative actions taken to ensure no further issues will occur		Completion date	
Vacancies at Kawerau have now been filled which has caused some constraints in some of the actions not being completed.		Continuous Improvement	