

Compliance plan for Manawa Energy Napier CC DUML Sept 2024,

Deriving submission information			
Non-compliance	Description		
<p>Audit Ref: 2.1 With: Clause 11(1) of Schedule 15.3</p> <p>From: 19-Feb-24 To: 31-Jul-24</p>	<p>In absolute terms, total annual consumption is estimated to be 29,900 kWh lower than the DUML database indicates resulting in over submission to the market.</p> <p>Ten lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 4,109 kWh.</p> <p>Potential impact: Medium Actual impact: Medium Audit history: Multiple times Controls: Moderate Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate as the processes are generally robust, but there is room for improvement.</p> <p>The impact on settlement and participants is assessed to be medium based on the estimated kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Manawa is working with Napier CC's contractor, Pope electrical, to identify where the issues lie so that the accuracy of submission can be improved. An update of the data held in SLIM by Manawa has already been actioned to help with accuracy and we will continue to work with Pope to make further improvements.</p>		01/03/2025	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Manawa has reached out to Napier CC directly to understand their new connection process (which is managed by the council and not their contractor) and how new assets are lived and included in the RAMM DB. Manawa will work with NCC to improve this process so that the accuracy of this DB is improved, and assets are being correctly recorded against the council's load.</p>		01/03/2025	

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: 19-Feb-24</p> <p>To: 31-Jul-24</p>	<p>Ten lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 4,109 kWh.</p> <p>Potential impact: Low</p> <p>Actual impact: Low</p> <p>Audit history: Multiple times</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 as historic issues are being resolved.</p> <p>The audit risk rating is low as the impact on reconciliation is small.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Manawa is working with Napier CC's contractor, Pope electrical, to identify where the issues lie so that the accuracy of submission can be improved. An update of the data held in SLIM by Manawa has already been actioned to help with accuracy and we will continue to work with Pope to make further improvements.</p>		01/03/2025	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Manawa has reached out to Napier CC directly to understand their new connection process (which is managed by the council and not their contractor) and how new assets are lived and included in the RAMM DB. Manawa will work with NCC to improve this process so that the accuracy of this DB is improved, and assets are being correctly recorded against the council's load.</p>		01/03/2025	

Description and capacity of load		
Non-compliance	Description	
Audit Ref: 2.4 With: Clauses 11(2) (d) of schedule 15.3 From: 19-Feb-24 To: 31-Jul-24	One item of load with no wattage recorded. Potential impact: Low Actual impact: Low Audit history: None Controls: Strong Breach risk rating: 1	
Audit risk rating	Rationale for audit risk rating	
Low	The controls are rated as strong as they will mitigate risk to an acceptable level. The audit risk rating is low as only one item of load was affected.	
Actions taken to resolve the issue	Completion date	Remedial action status
Manawa has raised this item with Pope electrical to resolve.	01/10/2024	Identified
Preventative actions taken to ensure no further issues will occur	Completion date	
Strong controls exist with the contractor, so no further preventative actions will be taken, although Manawa will work with Napier CC to improve the accuracy of their new connection process which should also support accuracy of attributes recorded in the DB for new assets.	01/03/2025	

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: 19-Feb-24</p> <p>To: 31-Jul-24</p>	<p>Five additional lights were found in the field of 399 items of load sampled.</p> <p>Potential impact: Medium</p> <p>Actual impact: Low</p> <p>Audit history: Multiple 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 recorded as moderate as errors are being corrected but there is room for improvement in the management of new streetlight connections as detailed in section 3.1.</p> <p>The impact is assessed to be low based on number of additional lights found in the field in comparison to the overall number of lights checked.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Manawa is working with Napier CC's contractor, Pope electrical, to identify where the issues lie so that the accuracy of submission can be improved. An update of the data held in SLIM by Manawa has already been actioned to help with accuracy and we will continue to work with Pope to make further improvements.</p>	01/03/2025	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa has reached out to Napier CC directly to understand their new connection process (which is managed by the council and not their contractor) and how new assets are lived and included in the RAMM DB. Manawa will work with NCC to improve this process so that the accuracy of this DB is improved, and assets are being correctly recorded against the council's load.</p>	01/03/2025	

Database accuracy			
Non-compliance	Description		
<p>Audit Ref: 3.1</p> <p>With: Clause 15.2 and 15.37B(b)</p> <p>From: 19-Feb-24</p> <p>To: 31-Jul-24</p>	<p>In absolute terms, total annual consumption is estimated to be 29,900 kWh lower than the DUMML database indicates resulting in over submission to the market.</p> <p>No ICP for the WTU0331 NSP.</p> <p>Ten lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 4,109 kWh.</p> <p>One item of load with no wattage recorded.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Four times previously</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>		
Audit risk rating	Rationale for audit risk rating		
Medium	<p>The controls are rated as moderate as historic corrections have been made and the processes managed by Pope Electrical are robust. There is room for improvement in relation to new streetlight connections as detailed in the recommendation above.</p> <p>The impact on settlement and participants is assessed to be medium based on the estimated kWh.</p>		
Actions taken to resolve the issue		Completion date	Remedial action status
<p>Manawa is working with Napier CC's contractor, Pope electrical, to identify where the issues lie so that the accuracy of submission can be improved. An update of the data held in SLIM by Manawa has already been actioned to help with accuracy and we will continue to work with Pope to make further improvements.</p>		01/03/2025	Investigating
Preventative actions taken to ensure no further issues will occur		Completion date	
<p>Manawa has reached out to Napier CC directly to understand their new connection process (which is managed by the council and not their contractor) and how new assets are lived and included in the RAMM DB. Manawa will work with NCC to improve this process so that the accuracy of this DB is improved, and assets are being correctly recorded against the council's load.</p>		01/03/2025	

Volume information accuracy		
Non-compliance	Description	
<p>Audit Ref: 3.2</p> <p>With: Clause 15.2 and 15.37B(c)</p> <p>From: 19-Feb-24</p> <p>To: 31-Jul-24</p>	<p>In absolute terms, total annual consumption is estimated to be 29,900 kWh lower than the DUMML database indicates resulting in over submission to the market.</p> <p>Ten lights incorrectly recorded as "PRIVATE" and excluded from submission resulting in a potential estimated under submission of 4,109 kWh.</p> <p>Potential impact: Medium</p> <p>Actual impact: Medium</p> <p>Audit history: Multiple times</p> <p>Controls: Moderate</p> <p>Breach risk rating: 4</p>	
Audit risk rating	Rationale for audit risk rating	
Medium	<p>The controls are rated as moderate as the processes are generally robust but there is room for improvement.</p> <p>The impact on settlement and participants is assessed to be medium based on the estimated kWh.</p>	
Actions taken to resolve the issue	Completion date	Remedial action status
<p>Manawa is working with Napier CC's contractor, Pope electrical, to identify where the issues lie so that the accuracy of submission can be improved. An update of the data held in SLIM by Manawa has already been actioned to help with accuracy and we will continue to work with Pope to make further improvements.</p>	01/03/2025	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
<p>Manawa has reached out to Napier CC directly to understand their new connection process (which is managed by the council and not their contractor) and how new assets are lived and included in the RAMM DB. Manawa will work with NCC to improve this process so that the accuracy of this DB is improved, and assets are being correctly recorded against the council's load.</p>	01/03/2025	