## Compliance Plan South Wairarapa DC DUML 2024

Deriving submission information			
Non-compliance	Description		
Audit Ref: 2.1	The DUML load is submitted using HHR profile, without an exemption in place.		
With: Clause 11(1) of Schedule 15.3	The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 8,800 kWh.		
	12 lights on Oates Place, Farley Ave and Cotterville Cres in Greytown have no ICP, no lamp information or wattage information recorded. Wattages and ICP numbers are added to RAMM extracts before they are provided to Mercury for lights on Oates Place and Farley Ave, but not lights 1567 and 1568 on Cotterill Crescent. These are estimated to be 28W LEDs and resulting in 239.2 kWh of under submission.		
	131 items of load have a zero lamp wattage, and 39 of those also have a blank light make and model. The wattage was unable to be confirmed but based on an average of 34.75 W across all items of load for ICP 0020906000WRDFA under submission of up to 4,552.25 kWh may have occurred.  Two items of load had unexpected zero gear wattages. I estimate that the missing wattage is at least 18W or 76.8 kWh per annum.		
	Potential impact: Low		
	Actual impact: Low		
	Audit history: Multiple times		
From: 01-Oct-23	Controls: Weak		
To: 20-Aug-24	Breach risk rating: 6		
Audit risk rating	Rationale for audit risk rating		
Medium	The controls are assessed to be weak overall because the field audit found that the database was not accurate with a 95% confidence level. The impact on settlement is medium based on the kWh differences identified.		
Actions taken to resolve the issue		Completion date	Remedial action status
Still working on the new profile applications to allow us to submit HHR for DUML. Delays caused due to lack of resource as other projects other prioritised, aiming to submit in coordination with our move from SAP to Robotron for LCOM which will be happening before the end of 2024.		End of 2024	Investigating
South Wairarapa DC are aware of the discrepancies and will be working to tidy up and ensure there is a process in place to avoid issues with database updates going forward.			
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to liaise with South Wairarapa DC to ensure that the database is as accurate as possible.		Ongoing	

ICP identifier and items of load			
Non-compliance	Description		
Audit Ref: 2.2 With: Clause 11(2)(c) and (d) of Schedule 15.3	12 lights on Oates Place, Farley Ave and Cotterville Cres in Greytown have no ICP, no lamp information or wattage information recorded. Wattages and ICP numbers are added to RAMM extracts before they are provided to Mercury for lights on Oates Place and Farley Ave, but not lights 1567 and 1568 on Cotterill Crescent. These are estimated to be 28W LEDs and resulting in 239.2 kWh of under submission.		
	Potential impact: Low		
	Actual impact: Low		
From: 01-Aug-24	Audit history: None		
To: 31-Aug-24	Controls: Moderate		
	Breach risk rating: 2		
Audit risk rating	Rationale for audit risk rating		
Low	The controls are moderate. Most items of load have ICP numbers recorded but some subdivisions missed having their ICP numbers and wattage information updated in RAMM. The impact on settlement is low based on the kWh under submitted.		
Actions taken to resolve the issue		Completion date	Remedial action status
South Wairarapa DC are aware of the discrepancies and will be working to tidy up and ensure there is a process in place to avoid issues with database updates going forward.		End of 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	
We will continue to liaise with South Wairarapa DC to ensure that the database is as accurate as possible.		Ongoing	

Description and capacity of load			
Non-compliance	Description		
Audit Ref: 2.4 With: Clause 11(2)(c) and (d) of Schedule 15.3	12 lights on Oates Place, Farley Ave and Cotterville Cres in Greytown have no ICP, no lamp information or wattage information recorded. Wattages and ICP numbers are added to RAMM extracts before they are provided to Mercury for lights on Oates Place and Farley Ave, but not lights 1567 and 1568 on Cotterill Crescent. These are estimated to be 28W LEDs and resulting in 239.2 kWh of under submission.		
	131 items of load have a zero lamp wattage, and 39 of those also have a blank light make and model. The wattage was unable to be confirmed but based on an average of 34.75 W across all items of load for ICP 0020906000WRDFA under submission of up to 4,552.25 kWh may have occurred.		
	Two items of load had unexpected zero gear wattages. I estimate that the missing wattage is at least 18W or 76.8 kWh per annum.		
	Potential impact: Low		
From: 01-Aug-24	Actual impact: Low		
To: 20-Aug-24	Audit history: Three times		
	Controls: Weak		
	Breach risk rating: 3		

Audit risk rating	Rationale for audit risk rating		
Low	The controls are assessed to be weak because 14.5% of lights with a DUML ICP recorded in the database have missing light model and wattage information. Many of the issues appear to relate to new subdivisions and an internal audit is being conducted to check and update this information.  The impact on settlement is low based on the kWh differences identified, and that SDWC populates some of the missing data before providing the extract to Mercury.		
Actions taken to resolve the issue		Completion date	Remedial action status
South Wairarapa DC are aware of the discrepancies and will be working to tidy up and ensure there is a process in place to avoid issues with database updates going forward.		End of 2024	Identified
Preventative actions taken to ensure no further issues will occur		Completion date	

Ongoing

Completion

date

Ongoing

We will continue to liaise with South Wairarapa DC to ensure

that the database is as accurate as possible.

avoid issues with database updates going forward.

that the database is as accurate as possible.

Preventative actions taken to ensure no further issues will

occur

We will continue to liaise with South Wairarapa DC to ensure

All load recorded in database			
Non-compliance	Description		
Audit Ref: 2.5 With: Clause 11(2A) of Schedule 15.3 From: 20-Aug-24 To: 20-Aug-24	Seven additional lights found in the field of the sample of 143 items of load (4.8% error rate).  Potential impact: Low  Actual impact: Low  Audit history: Multiple times previously  Controls: Moderate		
Audit risk rating	Breach risk rating: 2		
Low	Rationale for audit risk rating  The controls are rated as moderate as the processes in place will ensure that the data is recorded correctly most of the time.  The impact is low due to the small number of additional lights found in the field in relation to the overall count of the items of load.		
Actions taken to resolve the issue		Completion date	Remedial action status
South Wairarapa DC are aware of the discrepancies and will be working to tidy up and ensure there is a process in place to		End of 2024	Identified

Database accuracy				
Non-compliance	Description			
Audit Ref: 3.1 With: Clause 15.2 and	The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 8,800 kWh.			
15.37B(b)	12 lights on Oates Place, Farley Ave and Cotterville Cres in Greytown have no ICP, no lamp information or wattage information recorded.			
	12 lights on Oates Place, Farley Ave and Cotterville Cres in Greytown have no ICP, lamp information or wattage information recorded. Wattages and ICP numbers at added to RAMM extracts before they are provided to Mercury for lights on Oates Place and Farley Ave, but not lights 1567 and 1568 on Cotterill Crescent. These are estimated to be 28W LEDs and resulting in 239.2 kWh of under submission.			
	131 items of load have a zero lamp wattage, and 39 of those also have a blank light make and model. The wattage was unable to be confirmed but based on an average of 34.75 W across all items of load for ICP 0020906000WRDFA under submission of up to 4,552.25 kWh may have occurred.			
	Two items of load had unexpected zero gear wattages. I estimate that the mi wattage is at least 18W or 76.8 kWh per annum.  Five items of load on Tuscan Lane have incorrect street names recorded.			
	Potential impact: Low			
	Actual impact: Low			
From: 01-Aug-24	Audit history: Multiple times			
To: 20-Aug-24	Controls: Weak			
	Breach risk rating: 6			
Audit risk rating	Rationale for audit risk rating			
Medium	The controls are assessed to be weak because the field audit found that the database was not accurate with a 95% confidence level.			
	The impact on settlement is medium based on the kWh differences identified.			
Actions taken to resolve the issue		Completion date	Remedial action status	
South Wairarapa DC are aware of the discrepancies and will be working to tidy up and ensure there is a process in place to avoid issues with database updates going forward.		End of 2024	Identified	
Preventative actions taken to ensure no further issues will occur		Completion date		
We will continue to liaise with South Wairarapa DC to ensure that the database is as accurate as possible.		Ongoing		

Volume information accuracy			
Non-compliance	Description		
Audit Ref: 3.2 With: Clause 15.2 and 15.37B(c)	The DUML load is submitted using HHR profile, without an exemption in place.  The database is not confirmed as accurate with a 95% level of confidence resulting in an estimated annual over submission of 8,800 kWh.		
	12 lights on Oates Place, Farley Ave and Cotterville Cres in Greytown have no ICP, no lamp information or wattage information recorded. Wattages and ICP numbers are added to RAMM extracts before they are provided to Mercury for lights on Oates		

	The impact on settlement is medium based on the kWh differences identified.		
Medium	The controls are assessed to be weak overall because the field audit found that the database was not accurate with a 95% confidence level.		
Audit risk rating	Rationale for audit risk rating		
	Breach risk rating: 6		
	Controls: Weak		
	Audit history: Multiple times		
To: 20-Aug-24	Actual impact: Low		
From: 01-Oct-23	Potential impact: Low		
	Two items of load had unexpected zero gear wattages. I estimate that the missing wattage is at least 18W or 76.8 kWh per annum.		
	131 items of load have a zero lamp wattage, and 39 of those also have a blank light make and model. The wattage was unable to be confirmed but based on an average of 34.75 W across all items of load for ICP 0020906000WRDFA under submission of up to 4,552.25 kWh may have occurred.		
	Place and Farley Ave, but not lights 1567 and 1568 on Cotterill Crescent. These are estimated to be 28W LEDs and resulting in 239.2 kWh of under submission.		

Actions taken to resolve the issue	Completion date	Remedial action status
Still working on the new profile applications to allow us to submit HHR for DUML. Delays caused due to lack of resource as other projects other prioritised, aiming to submit in coordination with our move from SAP to Robotron for LCOM which will be happening before the end of 2024.  South Wairarapa DC are aware of the discrepancies and will be working to tidy up and ensure there is a process in place to avoid issues with database updates going forward.	End of 2024	Investigating
Preventative actions taken to ensure no further issues will occur	Completion date	
We will continue to liaise with South Wairarapa DC to ensure that the database is as accurate as possible.	Ongoing	