

SRV GRSF PTY LTD



Performance Audit & Asset Management System Review Report 2021 – EGL27

Audit Report	Authorisation	Name	Position	Date
Prepared By		Nicole Davies	Principal Consultant (GES Pty Ltd)	28/10/2021
Reviewed By (licensee)		Tom Frood	General Manager (SRV GRSF Pty Ltd)	3/11/2021

Contents

1.	EXECUTIVE SUMMARY.....	6
1.1	Performance Audit Summary of Findings _____	9
1.2	Performance Audit Excluded Conditions _____	10
1.3	Deviation from the Audit Plan _____	11
1.4	Asset Management System Review Summary _____	14
2.	PERFORMANCE AUDIT.....	17
2.1	Performance Audit Scope _____	17
2.2	Performance Audit Recommendations and Action Plans _____	18
3.	ASSET MANAGEMENT SYSTEM EFFECTIVENESS REVIEW	20
3.1	AMS Review Scope _____	20
3.2	Objective of the Asset Management System Review _____	21
3.3	Methodology for Asset Management System Review _____	21
3.4	Asset Management System Effectiveness Rating _____	21
3.5	Follow-Up from Previous Review Findings _____	23
3.6	Asset Management System Recommendations and Action Plans _____	24
3.7	Review Asset System Deficiencies/Recommendations _____	24
	APPENDIX 1- BEI GRSF PERFORMANCE AUDIT.....	25
	APPENDIX 2 – BEI GRSF ASSET MANAGEMENT REVIEW.....	45
	APPENDIX 3 – AUDIT PLAN ASSET REVIEW PRIORITIES	87
	APPENDIX 4 – AUDIT & REVIEW DOCUMENT LISTING	96

List of Tables

TABLE 1 Audit Compliant and Control Rating Scales	9
TABLE 2 Obligations Excluded from the Audit Report	10
TABLE 2A Deviations from the Audit Plan	11
TABLE 3 Performance Audit Compliance Summary	12
TABLE 3A Compliance and Controls Ratings Summary Table	13
TABLE 4 Rating Scale Reviews - Process & Policy and Performance	14
TABLE 5 Asset Management System Effectiveness Summary	14
TABLE 6 Status of Recommendations Addressing Non-Compliances from the Previous Audit	17
TABLE 7 Recommendations to Address Current Non-Compliances and Control Deficiencies	18
TABLE 8 List of Personnel Who Participated In Audit & Review	20
TABLE 10 Asset Management Process and Policy Definition Adequacy Ratings	22
TABLE 11 Asset Management Performance Ratings	22
TABLE 12 Ineffective Components Recommendations, Previous Review Implementation Plan	23
TABLE 13 Recommendations to Address Current Asset System Deficiencies	24
TABLE 14 Performance Audit	26
TABLE 15 Audit Review Ratings and Recommendations	46
TABLE 16 Effectiveness Criteria Pre-Audit Review	88
TABLE 17 Documents Reviewed and Assessment of Effectiveness	97

GLOSSARY

AMS – Asset Management System

BEI – Bright Energy Investments Pty Ltd

BEI Group – BEI and its subsidiary companies and operating trusts (including BEI GRSF)

BEI GRSF – SRV GRSF Pty Ltd as trustee for the GRSF Trust

BOP – Balance of Plant

CB – Circuit Breaker

Cbus – Construction and Building Unions Superannuation

CSEP – Community and Stakeholder Engagement Plan

DSA – Development Services Agreement between SynergyRED and the BEI Group

DIF – the Dutch Infrastructure Fund

EGL27 – The Generation Licence for SRV GRSF Pty Ltd in respect of the GRSF

ERA – Economic Regulation Authority

ETAC – Electricity Transfer Access Contract

FS – First Solar

GES – Geographe Environmental Services

GRSF – Greenough River Solar Farm

GRSF Trust – the owner and operator of the GRSF

MW – MegaWatt

O&M – Operate and Maintain

SCADA - Supervisory Control And Data Acquisition

SWIS – South West Interconnected System

WPN – Western Power Networks

This report was prepared by representatives of GES Pty Ltd in relation to the above named client's conformance to the nominated audit standard(s). Audits were undertaken using a sampling process and the report and its recommendations were reflective only of activities and records sighted during this audit process. GES Pty Ltd shall not be liable for loss or damage caused to or actions taken by third parties as a consequence of reliance on the information contained within this report or its accompanying documentation. The client had the opportunity for review to ensure no commercially sensitive information was disclosed.

1. EXECUTIVE SUMMARY

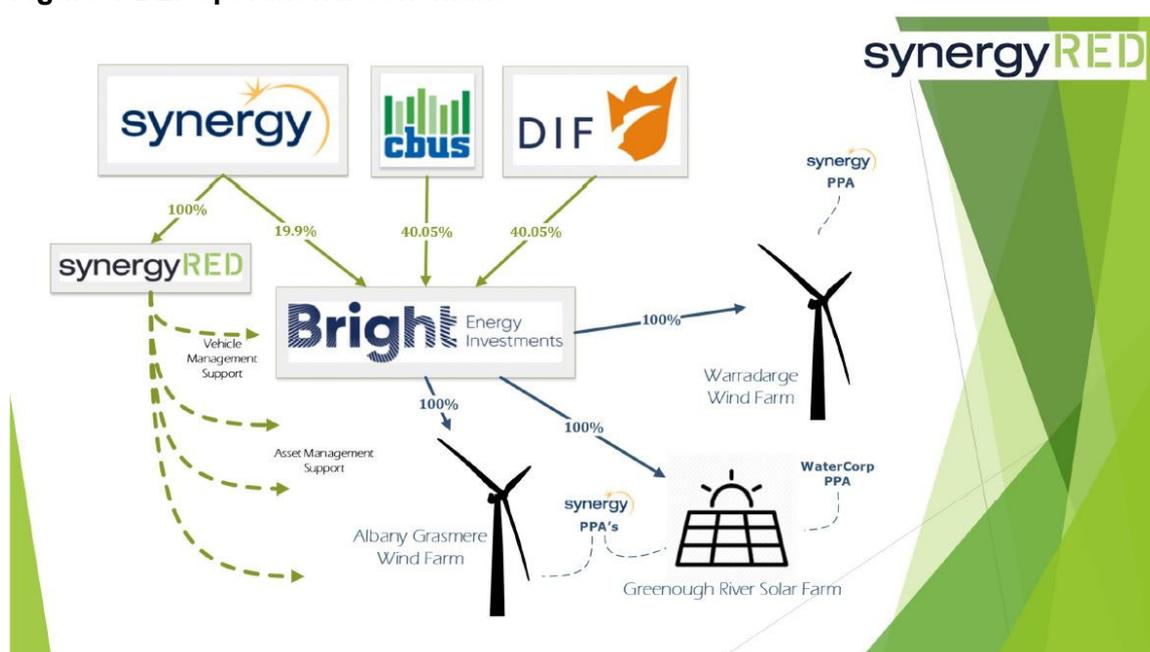
The Licensee is SRV GRSF Pty Ltd and for the purposes of future reference within this Audit & Review Report it is referred to as BEI GRSF (Bright Energy Investments Greenough River Solar Farm). The asset is the 40MW Greenough River Solar Farm (GRSF) located in the Mid-West Region of Western Australia, approximately 50km southeast of Geraldton in the Shire of Greater Geraldton. GRSF comprises two stages. The Practical Completion (PC) date for Stage 1 (10MW) was the 21st September 2012 and the PC date for Stage 2 (30 MW) was the 12th August 2020. It is noted that prior to the application for Stage 2 the Licensee was exempt from holding a Generation Licence, refer *Electricity Industry Exemption Order 2005* which exempts generating works under 30 MW (at each connection point) per annum.

The owner of the GRSF generation facility is SRV GRSF Pty Ltd as trustee for the GRSF Trust (BEI GRSF) with the parent company of BEI GRSF being Bright Energy Investments Pty Ltd as trustee for the Bright Energy Investments Trust (BEI).

The BEI group of companies (BEI Group) are owned by the joint venture partners Dutch Infrastructure Fund (DIF), Construction and Building Unions Superannuation (Cbus) and Electricity Generation and Retail Corporation trading as Synergy (Synergy).

BEI GRSF has engaged First Solar (FS) as the Operations and Maintenance (O&M) contractor and SynergyRED has been contracted as the asset manager. An overview of the BEI Operational Schematic is depicted in Figure 1 below.

Figure 1 BEI Operational Schematic



Asset Overview

The facility consists of two stages. Stage 1 consists of 10 MW ac of fixed tilt panels. Stage 2 consists of 30 MW ac of horizontal single-axis tracking panels. Balance of plant assets connect and control these stages to ensure they operate safely and reliably. Power generated by the GRSF is exported to the South West Interconnected System (SWIS). The point of connection is 132 kV at the Mungarra substation via a 132/22kV a step-up transformer. There are two O&M Agreements with First Solar, one for stage 1 (2012) and one for stage 2 (2020). Incentives for optimisation of plant performance have been defined.

The Licensee has issued a Consultancy Brief to undertake its first Performance Audit and Asset Management System Review as required by the Economic Regulation Authority (ERA/the Authority).

BEI GRSF holds an Electricity Generation Licence (EGL27) issued by the Economic Regulation Authority under the Electricity Industry Act 2004. This performance audit and asset management review was conducted in accordance with the guidelines issued by the Economic Regulation Authority (ERA) to assess the Licensee's level of compliance with the licence conditions.

Sections 13 and 14 of the Electricity Industry Act 2004 require as a condition of every licence that the licensee must, not less than once in every period of 24 months (or any longer period that the Authority allows) calculated from the grant of the licence, provide the Authority with a performance audit and an asset management system review report by an independent expert acceptable to the Authority. Geographe Environmental Services (GES) has been approved by the Authority (Ref: D234763 Date: 29/6/21) to undertake the works subject to an audit plan approved by the Authority.

The period for the audit and review is 24 July 2018 to 31 July 2021, and the report is due to be submitted to the Authority on or before 31 October 2021.

It is confirmed that the licensee facilitated the audit and review process by providing the audit team;

- Access to the facilities and business premises identified in the audit and review plan.
- Access to materials and information sources that the auditors needed to conduct the audit or review, including data, reports, records and any other relevant information that were available.
- Access to the relevant personnel at both the GRSF site and the Perth Office that were visited.
- An introduction to persons, other than employees of the licensee, who are relevant to the audit and review, such as contractors.

Performance Audit and Asset Management Review Objectives

The Asset Management System Review and the Performance Audit have been conducted in order to assess the effectiveness of BEI GRSF's Asset Management Systems and level of compliance with the conditions of its Electricity Generation Licence EGL27.

Through the execution of the Audit Plan, field work, assessment and testing of the control environment, the information system, control procedures and compliance attitude, the audit team members have gained

reasonable assurance that BEI GRSF had an effective asset management system with internal review processes implemented and had complied with its Generation Licence, with the exception of obligations 105 and 124. It is noted these non-compliances were as a result of issues relating to administrative oversights, specifically obligation 105 being a late payment of the standing charges fee and obligation 124 being in relation to the late submission of an annual compliance report and standing data.

Recommendations to address the non-compliances raised are detailed in Table 7. The recommendations made by the Audit Team relate to organisational awareness to compliance requirements, as well as implementing revised internal compliance processes. Opportunities for improvement identified that relate to the performance audit and review findings have been provided directly to the Licensee and have not been included in this document as required by the 2019 Audit and Review Guidelines – Electricity and Gas Licences section 5.1.8

It is the auditors' opinion that compliance and integrity of reporting by the Licensee is considered well managed and is comprehensively detailed in Appendix 1. This is the first audit and as such issues arising from the previous audit and review report are not applicable.

The site audit was conducted in the Perth office on the 7th September 2021 and at the GRSF on the 8th of September 2021. This audit report is an accurate representation of the audit team's findings and opinions. The Auditors confirm that the Licensee provided assistance to the Auditors, as required by Section 4.1 of the Audit Guidelines (2019).

1.1 Performance Audit Summary of Findings

Two licence obligations reviewed were found to be non-compliant during the audit period (refer Table 3 and Appendix 1). During the audit period, the organisation has established some processes to address these non-compliances and as such, compliance requirements were met in subsequent years. However, a further suggestion to improve the effectiveness of the actions taken has been detailed in Table 7.

A two-dimensional rating scale (refer Section 5.1.6.1 of the Audit Guidelines and Table 1 below) was used in the Audit report to summarise the compliance rating for each licence condition. Each obligation was rated for both the adequacy of existing controls and the compliance with the relevant licence obligation. The methodology for the Audit has been clearly defined in the Audit Plan.

TABLE 1 Audit Compliant and Control Rating Scales

Performance Audit Compliance & Controls Rating Scales			
Adequacy of Controls Rating		Compliance Rating	
Rating	Description	Rating	Description
A	Adequate controls – no improvement needed	1	Compliant
B	Generally adequate controls – improvement needed	2	Non-Compliant – minor impact on customers or third parties
C	Inadequate controls – significant improvement needed	3	Non-Compliant – moderate impact on customers or third parties
D	No controls evident	4	Non-Compliant – major impact on customers or third parties
NP	Not Performed	NR	Not rated – Determined Not Applicable during the audit period

A comprehensive report of the audit findings is included in Appendix 1.

1.2 Performance Audit Excluded Conditions

There were some Electricity Compliance Reporting Manual – June 2020 obligations for EGL27 that have been excluded from the audit because they are not applicable to GRSF. There are no Type 1 reporting requirements applicable to EGL27. Excluded compliance obligations were detailed in the Audit Plan. Deviations from the Audit Plan are detailed in Section 1.3.

TABLE 2 Obligations Excluded from the Audit Report

Obligations Excluded from the Performance Audit	
Ref*	Justification For Exclusion
101^	Not Applicable – this obligation only applies to the previous Audit & Review report as that is the report submitted during the current audit period. Since this is BEI GRSF's first Audit & Review it is Not Applicable.
104^	
120	Not Applicable – Individual performance standards have not been prescribed by the Authority.
401	Not Applicable – The Network Operator collects the energy data.
402	Not Applicable to Generators (Electricity Compliance Manual to be amended as advised by ERA)
405	Not Applicable – The network operator has access to their own tariff meters.
406	Not Applicable to Generators (Electricity Compliance Manual to be amended as advised by ERA)
435	Not Applicable to Generators (Electricity Compliance Manual to be amended as advised by ERA).

* Electricity Compliance Reporting Manual – June 2020

^ Deviation from Audit Plan see Table 2a

The Generation Licence compliance elements that were included in the scope of this audit are as defined in Table 3 and are further detailed in Appendix 1.

1.3 Deviation from the Audit Plan

As required by section 5.1.4 of the Audit and Review Guidelines – 2019, Auditors must identify any licence obligations or effectiveness criteria that were assessed after the approval of the audit plan by the ERA, as ‘not applicable’ or if the auditor has revised the audit priority for one or more licence obligations, the auditor must identify this in the report. The following table describes the deviations from the Audit Plan and explains the revision;

TABLE 2A Deviations from the Audit Plan

REF	OBLIGATION REFERENCE	DEVIATION DESCRIPTION
101 Type [2]	A licensee must provide the ERA with a performance audit conducted by an independent expert acceptable to the ERA, not less than once every 24 months.	Audit Priority - Priority 5 Deviation – Not Applicable Explanation of Revision - This is BEI GRSF’s first audit, this obligation is not applicable. The obligation only applies to the previous audit report as that is the report submitted during the current audit period.
104 Type [2]	A licensee must provide the ERA with a report by an independent expert about the effectiveness of its asset management system every 24 months, or such longer period as determined by the ERA.	Audit Priority - Priority 5 Deviation – Not Applicable Explanation of Revision - This is BEI GRSF’s first review, this obligation is not applicable. The obligation only applies to the previous review report as that is the report submitted during the current review period.
373 Type [NR]	Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	Audit Priority – Omitted from Audit Plan Deviation – Priority 5 Explanation of Revision – Omission identified in the execution of the Audit Plan. It has been included in Audit Report. Refer to Appendix 1 for detail.
324 339 388 408 416 417 448 Type [2]	Electricity Industry Metering Code, CI 3.3B Electricity Industry Metering Code, CI 3.11(3) Electricity Industry Metering Code, CI 5.4(2) Electricity Industry Metering Code, CI 5.19(3) Electricity Industry Metering Code, CI 5.21(5) Electricity Industry Metering Code, CI 5.21(6) Electricity Industry Metering Code, CI 6.1(2)	Audit Priority – Priority 5 Deviation – Priority 4 Explanation of Revision – Obligations assessed as of Minor Consequence revised to Moderate as aligned with Audit Guidelines. Note in Appendix 3 of 2019 Audit and Review Guidelines. To calculate the ‘inherent risk’ for a licence obligation, auditors must first identify the consequences of the risk occurring. Auditors should use the classifications (major, ¹¹² moderate ¹¹³ and minor ¹¹⁴) for licence obligations included in the ERA’s Electricity and Gas Compliance Reporting Manuals to determine the consequences of the risk occurring. As these were all Type 2 they should have classified as moderate consequence for risk occurring. Refer to Appendix 1 for detail ¹¹² Type 1 ¹¹³ Type 2 ¹¹⁴ Not reportable (NR)

TABLE 3 Performance Audit Compliance Summary

Compliance Obligation Reference No.	Licence Reference	Audit Priority	Adequacy of Controls Rating					Compliance Rating				
			A	B	C	D	NP	1	2	3	4	NR
SECTION 8: TYPE 1 REPORTING REQUIREMENTS												
THERE ARE NO TYPE 1 REPORTING REQUIREMENTS APPLICABLE TO EGL27												
SECTION 12: ELECTRICITY INDUSTRY ACT - LICENCE CONDITIONS AND OBLIGATIONS												
102	Electricity Industry Act section 14(1)(a) Generation Licence, condition 5.1.1	5	A					1				
103	Electricity Industry Act section 14(1)(b) Generation Licence, condition 5.1.2 and 5.1.3	4	A					1				
105	Electricity Industry Act section 17(1) Generation Licence, condition 4.2.1	3		B					2			
106	Electricity Industry Act section 31(3) Generation Licence, condition 4.1.1	5	A					1				
107	Electricity Industry Act section 41(6) Generation Licence, condition 4.1.1	4					NP				NR	
SECTION 13: ELECTRICITY LICENCES - LICENCE CONDITIONS AND OBLIGATIONS												
119	Electricity Industry Act section 11 Generation Licence, condition 4.3.1	4	A					1				
121	Electricity Industry Act section 11 Generation Licence, condition 5.3.2	4	A					1				
122	Electricity Industry Act section 11 Generation Licence, condition 5.1.5	4	A					1				
123	Electricity Industry Act section 11 Generation Licence, condition 4.4.1	4	A					1				
124	Electricity Industry Act section 11 Generation Licence, condition 4.5.1	3		B					2			
125	Electricity Industry Act section 11 Generation Licence, condition 3.8.1 and 3.8.2	4					NP				NR	
126	Electricity Industry Act section 11 Generation Licence, condition 3.7.1	4	A					1				
SECTION 14: ELECTRICITY INDUSTRY METERING CODE - LICENCE CONDITIONS AND OBLIGATIONS												
324	Electricity Industry Metering Code Cl 4.4(1) Generation Licence, condition 4.1.1	4*					NP				NR	
339	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	4*					NP				NR	
371	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP				NR	
372	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP				NR	
373	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP				NR	
388	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	4*					NP				NR	
407	Electricity Industry Metering Code, Cl 5.19(2) Generation Licence, condition 4.1.1	5					NP				NR	
408	Electricity Industry Metering Code, Cl 5.19(3) Generation Licence, condition 4.1.1	4*					NP				NR	
410	Electricity Industry Metering Code Cl Generation Licence, condition 4.1.1	5					NP				NR	

1.4 Asset Management System Review Summary

The asset management system was found to be appropriate and meets the requirements of the Audit and Review Guidelines – Electricity and Gas Licences (2019). There were no findings were the review performance rating or process and policy rating required recommendations to be made (refer section 5.1.8 of the Audit and Review Guidelines).

As required by section 5.1.6.2 of the Audit & Review Guidelines (March 2019) Table 5 summarises the auditor’s assessment of both the process and policy definition rating and the performance rating for each key process in the licensee’s asset management system, using the scales described in Table 9 and Table 10 (refer Section 3.3, Methodology for Asset Management Review).

TABLE 4 Rating Scale Reviews - Process & Policy and Performance

Process And Policy Rating Scale		Performance Rating Scale	
Rating	Description	Rating	Description
A	Adequately defined	1	Performing effectively
B	Requires some improvement	2	Improvement required
C	Requires substantial improvement	3	Corrective action required
D	Inadequate	4	Serious action required
NR	Not rated	NR	Not rated

The process and policy and asset management system adequacy ratings are summarised below;

TABLE 5 Asset Management System Effectiveness Summary

Asset Management System	Process & Policy Rating	Performance Rating
1. ASSET PLANNING	A	1
1.1 Asset management plan covers the processes in this table	A	1
1.2 Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	A	1
1.3 Service levels are defined in the asset management plan	A	1
1.4 Non-asset options (e.g. demand management) are considered	A	1
1.5 Lifecycle costs of owning and operating assets are assessed	A	1
1.6 Funding options are evaluated	A	1
1.7 Costs are justified and cost drivers identified	A	1
1.8 Likelihood and consequences of asset failure are predicted	A	1
1.9 Asset management plan is regularly reviewed and updated	A	1
2. ASSET CREATION AND ACQUISITION	A	1
2.1 Full project evaluations are undertaken for new assets, including comparative assessment of non- asset options	A	1
2.2 Evaluations include all life-cycle costs	A	1
2.3 Projects reflect sound engineering and business decisions	A	1

Asset Management System	Process & Policy Rating	Performance Rating
2.4 Commissioning tests are documented and completed	A	1
2.5 Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	A	1
3. ASSET DISPOSAL	A	1
3.1 Under-utilised and under-performing assets are identified as part of a regular systematic review process	A	1
3.2 The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	A	1
3.3 Disposal alternatives are evaluated	A	1
3.4 There is a replacement strategy for assets	A	1
4. ENVIRONMENTAL ANALYSIS	A	1
4.1 Opportunities and threats in the asset management system environment are assessed	A	1
4.2 Performance standards (availability of service Capacity, continuity, emergency response, etc.) are measured and achieved	A	1
4.3 Compliance with statutory and regulatory requirements	A	1
4.4 Service standard (customer service levels etc) are measured and achieved.	A	1
5. ASSET OPERATIONS	A	1
5.1 Operational policies and procedures are documented and linked to service levels required	A	1
5.2 Risk management is applied to prioritise operations tasks	A	1
5.3 Assets are documented in an asset register including asset type, location, material, plans of components and an assessment of assets' physical/ structural condition	A	1
5.4 Accounting data is documented for assets	A	1
5.5 Operational costs are measured and monitored	A	1
5.6 Staff resources are adequate and staff receive training commensurate with their responsibilities.	A	1
6. ASSET MAINTENANCE	A	1
6.1 Maintenance policies and procedures are documented and linked to service levels required	A	1
6.2 Regular inspections are undertaken of asset performance and condition	A	1
6.3 Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	A	1
6.4 Failures are analysed and operational / maintenance plans adjusted where necessary	A	1
6.5 Risk management is applied to prioritise maintenance tasks	A	1
6.6 Maintenance costs are measured and monitored	A	1
7. ASSET MANAGEMENT INFORMATION SYSTEM	A	1
7.1 Adequate system documentation for users and IT operators	A	1
7.2 Input controls include suitable verification and validation of data entered into the system	A	1
7.3 Security access controls appear adequate such as passwords	A	1
7.4 Physical security access controls appear adequate	A	1
7.5 Data backup procedures appear adequate and backups are tested	A	1

Asset Management System	Process & Policy Rating	Performance Rating
7.6 Computations for licensee performance reporting are accurate	A	1
7.7 Management reports appear adequate for the licensee to monitor licence obligations	A	1
7.8 Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	A	1
8. RISK MANAGEMENT	A	1
8.1 Risk management policies and procedures exist and are applied to minimise internal and external risks	A	1
8.2 Risks are documented in a risk register and treatment plans are implemented and monitored	A	1
8.3 Probability and consequences of asset failure are regularly assessed	A	1
9. CONTINGENCY PLANNING	A	1
9.1 Contingency plans are documented understood and tested to confirm their operability and to cover higher	A	1
10. FINANCIAL PLANNING	A	1
10.1 The financial plan states the financial objectives and identifies strategies and actions to achieve those	A	1
10.2 The financial plan identifies the source of funds for capital expenditure and recurrent costs	A	1
10.3 The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	A	1
10.4 The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	A	1
10.5 The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	A	1
10.6 Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	A	1
11. CAPITAL EXPENDITURE PLANNING	A	1
11.1 There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	A	1
11.2 The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	A	1
11.3 The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	A	1
11.4 There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	A	1
12. REVIEW OF AMS	A	1
12.1 A review process is in place to ensure the asset management plan and the asset management system described in it remain current	A	1
12.2 Independent reviews (e.g. internal audit) are performed of the asset management system	A	1

2. PERFORMANCE AUDIT

2.1 Performance Audit Scope

In executing the Audit Plan and in line with the Audit & Review Guidelines (March 2019) the auditors, when assessing if the licensee has complied with its licence obligations, applied a level of scrutiny that corresponds to a “reasonable assurance engagement”. This was further detailed within the audit plan (refer Paragraph 12(a)(i)(a) of ASAE 3000, June 2014).

This was the first audit of EGL27. As such, recommendations from the previous audit and as required by Section 11.3 of the Audit Guidelines (March 2019) were not applicable.

TABLE 6 Status of Recommendations Addressing Non-Compliances from the Previous Audit

A Resolved during current audit period				
Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors’ Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable)
	Controls and Compliance Rating			
	Legislative Obligation			
	Details of Inadequate Controls and/or Non-Compliance			Details of Further Action Required (Including Current Recommendation Reference, if Applicable)

This is the first audit for EGL27 as such there were no previous audit recommendations that were resolved during the current audit period

B Unresolved at end of current audit period

Details of Inadequate Controls and/or Non-Compliance

This is the first audit for EGL27 as such there were no previous audit recommendations that were unresolved at the end of the current audit period

2.2 Performance Audit Recommendations and Action Plans

Recommendations made within the report are detailed below (if applicable) and will be reviewed and included in the post audit implementation plan (if required) by the licensee to ensure compliance with requirements.

TABLE 7 Recommendations to Address Current Non-Compliances and Control Deficiencies

A Resolved during the current audit period

Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Date Resolved & Action Taken by the Licensee	Auditors Comments
	Controls and Compliance Rating			
	Legislative Obligation			
	Details of Inadequate Controls and/or Non-Compliance			

There were no audit recommendations that were resolved during the current audit period

B Unresolved during the current audit period

Recommendation Reference (no./year)	Licence Obligation Reference Number	Auditors' Recommendation	Auditors Comments
	<p>Controls and Compliance Rating</p> <p>Legislative Obligation</p> <p>Details of Inadequate Controls and/or Non-Compliance</p>		
1/2021	<ul style="list-style-type: none"> • 105 • B 2 • A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014. • Reported late payment fees Annual Compliance Report 2018 • Standing Data Charges were paid outside the required payment terms on 1 occasion during the audit period. 	<p>Ensure the obligation to pay Standing Data charges is incorporated in the GRSF AMP. Further review the effectiveness of the corrective actions implemented to ensure ongoing compliance processes in relation to payment of prescribed fees and embed into normal business practices. Consideration could be given to including requirement as a routine in accounts or similar software, specific budgeting reference to ensure compliance is monitored and does not rely just on tacit knowledge. A process to ensure compliance in the event of a change in requirements could also be considered.</p>	Refer Post Audit Action Plan
2/2021	<ul style="list-style-type: none"> • 124 • B 2 • A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act • Late submission of Annual Compliance Report 2017-2018 reporting year. Failure to submit standing data by due date. 	<p>BEI GRSF corporate systems that have been implemented to ensure submission of Annual Compliance Reports have been effective since 2019 and the Governance Manager position has been created. However, further actions to ensure controls are established for the submission Standing Data to the ERA i.e. due 30 September annually. Specifically, the Licensee could consider the inclusion of this requirement in the BEI Critical Dates Register and detailing the requirements with the GRSF Asset Management Plan.</p>	Refer Post Audit Action Plan

3. ASSET MANAGEMENT SYSTEM EFFECTIVENESS REVIEW

3.1 AMS Review Scope

The scope of the AMS review included an assessment of adequacy and effectiveness of the BEI GRSF’s Asset Management System by evaluating during the audit period 24th July 2018 to 31st July 2021 the following;

1. Asset Planning
2. Asset creation/acquisition
3. Asset disposal
4. Environmental analysis
5. Asset operations
6. Asset maintenance
7. Asset management information system
8. Risk management
9. Contingency planning
10. Financial planning
11. Capital expenditure planning
12. Review of asset management system

The review was established as a requirement of the current Generation Licence issued by the Economic Regulation Authority to BEI GRSF.

The asset management review followed the ERA approved audit plan and used;

- a risk based approach to auditing using the risk evaluation model set out in ISO31000:2018
- an overall effectiveness rating for an asset management process, based on a combination of the process and policy adequacy rating and the performance rating,
- the format and content of the reviewer’s report; and post- review plan as described in the Guidelines.
- the Asset Management System Review has been carried out as a ‘reasonable assurance engagement’.

TABLE 8 List of Personnel Who Participated In Audit & Review

Item	Name	Company	Title
1	Peter Bradfield	First Solar	Manager Power Plant AUS
2	Rao Pappula	First Solar	Engineering Manager
3	Nicole Ghiotto	First Solar	Supervisor Technical Operations
4	John Lorenti	SynergyRED	Asset Manager

Item	Name	Company	Title
5	Alistair Standing	SynergyRED	Engineer
6	Tom Frood	BEI & BEI GRSF	General Manager
7	Daniel Chua	SynergyRED	BEI Senior Accountant
8	Brett Manning	SynergyRED	Governance Manager
9	Nicole Davies	GES	Lead Auditor
10	Neema Premji	GES	Auditor/Technical Specialist

The Review was conducted in conjunction with the Performance Audit during July – October 2021 and included desktop review and two day’s audit on site to execute the review plan, interview sessions and report writing. In total the audit and review required 65 hours of each of the Audit Team member’s time.

3.2 Objective of the Asset Management System Review

The objective of the review was to examine the effectiveness of the processes used by the BEI GRSF to deliver asset management, the information systems supporting asset management activities and the data and knowledge used to make decisions about asset management. These elements were examined from a life cycle perspective i.e. planning, construction, operation, maintenance, renewal, replacement and disposal using the guidelines developed by the Economic Regulation Authority.

3.3 Methodology for Asset Management System Review

The audit methodology detailed in the Audit and Review Guidelines – Electricity and Gas Licences (March 2019) was used in the execution of the Asset Management System Review and was further detailed in the Audit Plan.

3.4 Asset Management System Effectiveness Rating

The Audit and Review Guidelines – Electricity and Gas Licences (March 2019) (section 5.1.6.2) states that the asset management review report must provide a table that summarises the auditor’s assessment of both the process and policy definition rating and the performance rating for each key process in the licensee’s asset management system using the scales described in Table 9 and Table 10. It is left to the judgement of the auditor to determine the most appropriate rating for each asset management process.

TABLE 10 Asset Management Process and Policy Definition Adequacy Ratings

Rating	Description	Criteria
A	Adequately defined	<ul style="list-style-type: none"> Processes and policies are documented. Processes and policies adequately document the required performance of the assets. Processes and policies are subject to regular reviews and updated where necessary. The asset management information system(s) are adequate in relation to the assets being managed.
B	Requires some improvement	<ul style="list-style-type: none"> Processes and policies require improvement. Processes and policies do not adequately document the required performance of the assets. Reviews of processes and policies are not conducted regularly enough. The asset management information system(s) requires minor improvements (taking into consideration the assets being managed).
C	Requires substantial improvement	<ul style="list-style-type: none"> Processes and policies are incomplete and require substantial improvement. Processes and policies do not document the required performance of the assets. Reviews of processes and policies are considerably out of date. The asset management information system(s) requires substantial improvements (taking into consideration the assets being managed)
D	Inadequate	<ul style="list-style-type: none"> Processes and policies are not documented. The asset management information system(s) is not fit for purpose (taking into consideration the assets being managed).

TABLE 11 Asset Management Performance Ratings

Rating	Description	Criteria
1	Performing effectively	<ul style="list-style-type: none"> The performance of the process meets or exceeds the required levels of performance. Process effectiveness is regularly assessed and corrective action taken where necessary.
2	Improvement required	<ul style="list-style-type: none"> The performance of the process requires some improvement to meet the required level. Process effectiveness reviews are not performed regularly enough. Recommended process improvements are not implemented
3	Corrective action required	<ul style="list-style-type: none"> The performance of the process requires substantial improvement to meet the required level. Process effectiveness reviews are performed irregularly or not at all. Recommended process improvements are not implemented
4	Serious action required	<ul style="list-style-type: none"> Process is not performed or the performance is so poor the process is considered to be ineffective.

3.5 Follow-Up from Previous Review Findings

This was the first Review and as such no recommendations of the previous review were applicable.

TABLE 12 Ineffective Components Recommendations, Previous Review Implementation Plan

A Resolved during current review period				
Recommendation Reference (no./year)	Rating	Auditors' Recommendation	Date Resolved	Further Action Required (Yes/No/Not Applicable)
	Asset Management Process and Effectiveness Criterion			
	Details of Deficiency			Details of Further Action Required (Including Current Recommendation Reference, if Applicable)
	Details of Inadequate Controls and/or Non-Compliance			

This is the first review for EGL27 as such there were no previous review recommendations that were unresolved at the end of the current audit period

B Unresolved at end of current review period				
---	--	--	--	--

This is the first review for EGL27 as such there were no previous review recommendations that were unresolved at the end of the current audit period

3.6 Asset Management System Recommendations and Action Plans

As stipulated in section 5.3 of the Audit and Review Guidelines – Electricity and Gas Licences (March 2019), the Audit Team noted that the Asset Management Review Post Implementation Plan does not form part of the Audit Opinion. There were no recommendations made from the current review that required post implementation plans.

3.7 Review Asset System Deficiencies/Recommendations

TABLE 13 Recommendations to Address Current Asset System Deficiencies

A Resolved during current review period				
Recommendation Reference (no./year)	Rating	Action Taken by Licensee	Date Resolved	Auditor's Comments
	Asset Management Process and Effectiveness Criterion			
	Details of Deficiency Details of Inadequate Controls and/or Non-Compliance			

There were no recommendations from the current review that were resolved during the current review period.

B Unresolved during current review period
--

There were no recommendations from the current review that were unresolved during the current review period.

APPENDIX 1- BEI GRSF PERFORMANCE AUDIT

OCTOBER 2021

TABLE 14 Performance Audit

12. Electricity Industry Act – Licence conditions and obligations			
No.	AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
102 Type [NR]	OBLIGATION: <i>Generation Licence, condition 5.1.1 / Electricity Industry Act, section 14(1)(a)</i> A licensee must provide for an asset management system.	Controls Rating: A	Compliance Rating: 1
	<p>Finding – The licensee provided for, developed and implemented an effective Asset Management System for GRSF. The Asset Management System (AMS) manual was comprehensive and incorporated the Asset Management Plan (AMP) developed and reviewed by SynergyRED and First Solar. The AMS and AMP documentation addresses the Audit Guideline requirements. The Licensee ensured compliance with regards to the AMS elements. This document was also internally audited by Synergy’s Corporate Office and recommendations were being implemented. Further detail is referenced in Appendix 2.</p> <p>Documents/Evidence – 1,2,3,4,6,10,11,13,15,16,17,27,28,35,36,37,38,101,109,121,124,185,196,200</p> <p>Observations:</p> <ul style="list-style-type: none"> AMS manual comprehensive covering all requirements in the Audit Guidelines Clear definition of responsibilities in AMS The AMS and AMP clearly delineates the roles, responsibilities and business relationship between BEI GRSF, SynergyRED and First Solar THE AMS and AMP clearly articulates the expectations of all parties. This AMS has been structured to align with both the framework requirements of the Economic Regulation Authority (ERA) and the asset management standards of AS ISO 55001. 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
103 Type [2]	OBLIGATION: <i>Generation Licence, condition 5.1.2 and 5.1.3 / Electricity Industry Act, section 14(1)(b)</i> A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	Controls Rating: A	Compliance Rating: 1
	<p>Finding – As required by the Generation Licence the Licensee for the GRSF was required to notify the ERA of any substantial changes to the AMS within 10 business days. Practical completion for Stage 2 was 12 August 2020. The Licensee notified the ERA of the change to AMS to incorporate the solar farm on the 16/7/2021. The Licensee demonstrated exercise of organisational control processes in relation to this obligation. Specifically, the requirement was detailed in section 4.4.1 of the GRSF Asset Management Plan 2020/2, management review processes were implemented (refer internal communications. GRSF Monthly Meetings, VMA Reports), and monitoring of compliance with EGL27 was evident in Board Minutes.</p>		

	<p>Documents/Evidence – Interview with Asset Manager, Governance Manager, 3</p> <p>Observations:</p> <ul style="list-style-type: none"> • Emails sighted during the Perth Office site visit. • GRSF AMP specified the requirement to notify the ERA of any material changes to its corporate, financial, technical or asset management system in line with the requirements of the licence. • Compliance monitored at the site, management and Board level. Evidence of consideration of EGL27 compliance requirements was sighted during the audit. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • Nil 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
<p>105 Type [2]</p>	<p>OBLIGATION: <i>Generation Licence, condition 4.2.1/ Economic Regulation Authority (Licensing Funding) Regulations 2014</i> A licensee must pay the prescribed licence fees to the ERA according to clauses 6, 7 and 8 of the Economic Regulation Authority (Licensing Funding) Regulations 2014.</p>	<p>Controls Rating:</p> <p>B</p>	<p>Compliance Rating:</p> <p>2</p>
	<p>Finding – The Licensee paid the Standing charges invoice late on one occasion during the audit period.</p> <p>It is noted that the 2019 Annual Compliance Report reported the late payment of 2018 Annual Licence Fee, however, when cross referenced with ERA records this payment was noted to be compliant and paid on 3rd August 2018. As such all Annual Licence payments were made in compliance with this obligation.</p> <p>It is noted that when the generation licence was transferred from Greenough River Solar Farm Pty Ltd to SRV GRSF Pty Ltd as trustee for GRSF Trust the due date for annual licence fee payment changed. As such, payment due dates were aligned with licence renewal from date of issue 13/7/2017 to version date 24/8/2018.</p> <p>Documents/Evidence – 3, 28, 80, ERA INVOICES, 273, 274</p> <p>Observations:</p> <ul style="list-style-type: none"> • Standing Data charges only applicable on practical completion of Stage 2 • Standing Data Charges not included in the Critical Dates Register sighted during the audit • Note revised critical dates register provided to audit team BEI Critical Dates Register – October 2021 • The change in company name altered the due dates of Annual Generation Licence fees from commencement date 13/7/2017 to version 3 date 24/7/2018. • Provision for licence payments in the budget 		

- SynergyRED GRSF AMP doesn't specifically refer to the Standing Data Charges.
- During the Audit it was confirmed that the Licensee had provided the accounts payable email directly to the ERA for the receipt of invoices.
- It is noted that although outside the Audit Scope, the payment of Standing Charges fees due 8th October 2021 were not made in accordance with payment terms, hence the recommendation to review the effectiveness of the corrective actions implemented.
- Compliance was monitored in Business Plan

During the Audit period (24 July 2018 to 31 July 2021) the annual licence charge for EGL27 paid;

LICENCE PERIOD	ERA INVOICE REF	DATE PAID	DUE DATE	COMPLIANT	COMMENTS
On grant of licence (24 July 2018 to 23 July 2019)	ERA101636	3/8/2018	12 th August 2018	YES	Cl 6(3)(a) payable to the Authority within one month after the day on which the licence was granted
24 July 2019 to 23 July 2020	ERA102070	22/7/2019	23 rd August 2019	YES	<u>Note:</u> Invoice Date 2/7/2019
24 July 2020 to 23 July 2021	ERA102539	7/8/2020	23 rd August 2020	YES	<u>Note:</u> Invoice Date 8/7/2020
24 July 2021 to 23 July 2021	ERA1000662	22/6/2021	23 rd August 2021	YES	Note: Invoice Date 8/6/21 Payment due date according to <i>Electricity Industry Act</i> outside scope of audit period but ERA1000662 states payment due 8/7/21 which is within scope of audit.

During the Audit period (24 July 2018 to 31 July 2021) the standing data charges for EGL27 were paid;

CHARGE PERIOD	ERA INVOICE REF	DATE PAID	DUE DATE	COMPLIANT	COMMENTS
Quarter July-Sept 2020	ERA1000106	23/12/2020	6/2/21	YES	ERA gave extended payment terms for COVID
Quarter Oct-Dec 2020	ERA1000382	1/6/2021	7/5/21	NO	
Quarter Jan-Mar 2021	ERA1000630	22/6/2021	30/6/2021	YES	
Quarter April-June 2021	ERA1000897	NA	8/10/2021	NA	Note: Outside scope of audit period.

	<p>Recommendation:</p> <p>1/2021 – Ensure the obligation to pay Standing Data charges is incorporated in the GRSF AMP. Further review the effectiveness of the corrective actions implemented to ensure ongoing compliance processes in relation to payment of prescribed fees and embed into normal business practices. Consideration could be given to including requirement as a routine in accounts or similar software, specific budgeting reference to ensure compliance is monitored and does not rely just on tacit knowledge. A process to ensure compliance in the event of a change in requirements could also be considered.</p>	<p>Action:</p> <ul style="list-style-type: none"> Refer Post Audit Action Plan 	
106 Type [NR]	<p>OBLIGATION: <i>Generation Licence, condition 4.1.1 / Electricity Industry Act, section 31(3)</i></p> <p>A licensee must take reasonable steps to minimise the extent, or duration, of any interruption, suspension or restriction of the supply of electricity due to an accident, emergency, potential danger or other unavoidable cause.</p>	<p>Controls Rating:</p> <p>A</p>	<p>Compliance Rating:</p> <p>1</p>
	<p>Finding – The Licensee and its contractor had undertaken risk assessment and the Licensee had taken significant measures to ensure the plant performance both contractually and operationally. Well established accident and emergency procedures were developed and implemented.</p> <p>Evidence – 1, 3, 7, 8, 9, 68, 73, 74, 82, 106, 113, 115,197</p> <p>Observations:</p> <ul style="list-style-type: none"> First Solar has contractual incentives to ensure availability of the GRSF. Solar Farm achieved better availability than contracted In the first 2 years of operations any defects associated with Stage 2 are the responsibility of EPC contractor of the facility. Limited impact experienced from Covid-19 driven supply chain issues. Asset failure risks were covered by first Solar and evident in site risk registers Solar Panel spares readily available on site. SynergyRED continues to monitor availability and solar panels and purchase accordingly to meet future demand Cyclone Seroja in April 2021 caused some production losses predominantly due to Western Power outages after Seroja. The cyclone caused some minor damage to GRSF2 and major damage to Western Power network that put BEI facilities under long term constraint. GRSF was offline from 11th April to 25th May. Learnings and actions from cyclone event have been managed informally. Consideration could be given to including extreme weather events in the site risk register GRSF is not configured for black start and can only be started by energising the 132kV interconnector from Western Power Network. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

107 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.1.1 / Electricity Industry Act, section 41(6)</i>	Controls Rating:	Compliance Rating:
	A licensee must pay the costs of taking an interest in land or an easement over land.	NP	NR
<p>Finding – The Governance Manager confirmed that GRSF did not take an interest or an easement over land at the recommendation or direction of the Minister under the Licence during the audit period, as defined by Part 9 the <i>Land Administration Act 1997</i>. Land access arrangements have been established. The GRSF was located on 2 private adjoining lots approximately 50km south east of Geraldton and was located on the southern site of Walkaway Nangetty road, near the Mungarra substation. BEI GRSF leased land from the owners of these farms. The lease agreements were provided for review. The Asset Manager confirmed lease payments were made and access to lease holders land was readily available during the site visit</p> <p>Evidence – 1, 80, 104,106,109, 122</p> <p>Observations:</p> <ul style="list-style-type: none"> • Obligation specific to the requirements of the <i>Land Administration Act 1997</i> • Noted Leasing arrangements relevant to obligation 106 • Licensee email communication confirming lease payments • Confirmed the terms of the lease are in excess of the expiry terms of EGL27. • Budgets sighted with lease provision and confirmed by Licensee. • Lease payments in the Critical Dates Register 			
Recommendation:		Action:	
<ul style="list-style-type: none"> • None 		<ul style="list-style-type: none"> • Nil 	
13 Electricity Licences – Licence Conditions and Obligations			
119 Type [2]	OBLIGATION: <i>Generation Licence, condition 4.3.1 / Electricity Industry Act, section 11</i>	Controls Rating:	Compliance Rating:
	A licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	A	1
<p>Finding – The GRSF Hold Trust Group consolidated special purpose financial statements for the financial years ending 30 June were audited by independent third party accountants and assessed compliance with Australian financial reporting standards. The Financial Reports contain statement of compliance that the financial statements were prepared in accordance with the relevant Australian Accounting Standards and Interpretations as related to the Licensee. The Licensee had robust control processes established to ensure compliance with this requirement, as per the Boards financial responsibilities.</p> <p>Evidence – 15, 16, 17, 196, 235</p>			

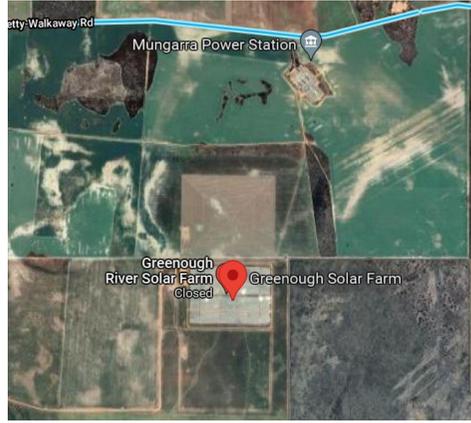
	<p>Observations:</p> <ul style="list-style-type: none"> GRSF audited financial statements FY2018-2021 Board Minutes evidenced requirement – Ref 235 Item 6.2 Financial Statements Accounting records maintained for the audit period 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
121 Type [2]	<p>OBLIGATION: Generation Licence, condition 5.3.2 / Electricity Industry Act, section 11 A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit</p>	<p>Controls Rating:</p> <p style="text-align: center;">A</p>	<p>Compliance Rating:</p> <p style="text-align: center;">1</p>
	<p>Finding – The Licensee engaged the Auditor with a Request For Proposal that requested the Auditor to comply with the Economic Regulation Authority's 2019 Audit and Review Guidelines.</p> <p>Documents/Evidence – ERA and Licensee communication, RFP (271)</p> <p>Observations:</p> <ul style="list-style-type: none"> Copies of communications received from the Authority relating to audit requirements were sent by Licensee through to Auditor to convey requirements specifically the undertaking of audits in compliance with the Audit & Review Guidelines: Electricity Gas and Water Licences. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
122 Type [2]	<p>OBLIGATION: Generation Licence, condition 5.1.5 / Electricity Industry Act, section 11 A licensee must comply, and must require the licensee's expert to comply, with the relevant aspects of the ERA's standard audit guidelines for an asset management system review.</p>	<p>Controls Rating:</p> <p style="text-align: center;">A</p>	<p>Compliance Rating:</p> <p style="text-align: center;">1</p>
	<p>Finding – The Licensee engaged the Auditor with a Request For Proposal that requested the Auditor to comply with the Economic Regulation Authority's 2019 Audit and Review Guidelines.</p> <p>Documents/Evidence – ERA and Licensee communication, RFP (271)</p> <p>Observations:</p> <ul style="list-style-type: none"> Copies of communications received from the Authority relating to audit requirements were sent by Licensee through to Auditor to convey requirements specifically the undertaking of audits in compliance with the Audit & Review Guidelines: Electricity Gas and Water Licences. 		

	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
123 Type [2]	OBLIGATION: Generation Licence, condition 4.4.1 / Electricity Industry Act, section 11 In the manner prescribed, a licensee must notify the ERA, if it is under external administration or if there is a significant change in the circumstances that the licence was granted which may affect the licensee's ability to meet its obligations.	Controls Rating:	Compliance Rating:
		A	1
<p>Finding – The Licensee demonstrated compliance with this requirement as evidenced in communications provided to ERA regarding the EPC Contract of Stage 2. Control activities, policies and procedures implemented by the Licensee ensure compliance. The Governance Manager was appointed to monitor compliance and further compliance obligations were monitored through management meetings.</p> <p>Documents/Evidence – Interview with the Governance Manager, 271, 272, 273, 274, 275</p> <p>Observations –</p> <ul style="list-style-type: none"> Transfer of EGL27 from Greenough River Solar Farm Pty Ltd to SRV GRSF Pty Ltd. On 23 April 2018 the Licensee applied to transfer EGL27 from Greenough River Solar Farm Pty Ltd On the 30 July 2018 Decision to approve the transfer of Electricity Generation Licence No. 27 Asset sold 10/4/2018 ERA advised within 10 business days. Note sale of asset was outside scope of Audit. 22/11/18 Notification of a change in circumstances to the ERA regarding EPC Contractor of Stage 2 VMA Meetings and Board Meetings monitor compliance The Governance Manager provided evidence of compliance Noted the Licensee undertook yearly review of obligations and commissioned a third party independent review of the obligations during the audit period 			
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
124 Type [2]	OBLIGATION: Generation Licence, condition 4.5.1 / Electricity Industry Act, section 11 A licensee must provide the ERA, in the manner prescribed, with any information that the ERA requires in connection with its functions under the Electricity Industry Act.	Controls Rating:	Compliance Rating:
		B	2
<p>Finding – During the Audit Period the Licensee provided the Authority with information it required in connection with its functions under the Act, with the exception of the late submission of the Annual Compliance Report for the 2017-2018 reporting year and the submission of Standing Data for the 2020 reporting year.</p> <p>The Annual Compliance Reports were required to be submitted by the 31st August annually and the 2017-2018 report was submitted on the 19/9/2018. All subsequent reports were submitted in time demonstrating effectiveness of the corrective actions (i.e Governance Manager role) arising from the 2019 Annual Compliance Report.</p>			

<p>Standing data was recorded as being submitted late for the 2020 reporting period. It is noted that Standing Data was not required to be submitted to the ERA until the commencement of Stage 2 which occurred after 30 June 2020. As such the first instance for the obligation to report standing data during the audit period was 30 September 2021. However, there was some confusion around practical completion dates as Stage 2 was delayed and the ERA requested Standing Data by 30 September 2020. The Licensee must provide the ERA with any information that the ERA requires in connection with its functions under the Electricity Industry Act, therefore the accuracy of the Standing Data was not relevant to the non-compliance with this obligation. The non-compliance is noted in relation to failure to provide the information requested by the due date and the Licensee's operational controls in relation to provision of information and awareness to compliance requirements.</p> <p>Evidence – Annual Compliance Reports 2017-2018, 2018-2019, 2019 2020, email communications from ERA, Interview with Governance Manger, 93,119, 122, 123, 277, 278</p> <p>Observations:</p> <ul style="list-style-type: none"> • 2020 Licence Standing Charge Data for SRV GRSF Pty Ltd (EGL27) and BEI WWF Pty Ltd (EGL29) emails were sighted • Submission of Standing data for 2021 outside the audit scope but it was sighted and confirmed • Note Standing data charges commenced in Quarter July-Sep 2020 • All subsequent compliance reports were submitted on time • BEI Critical Dates and the GRSF AMP do not reference the submission of standing data to the ERA Annually by 30th September • Governance Manager role established • Practical completion of Stage 2 was delayed resulting in some confusion as to the requirement to submit standing data • Technically, Standing Data was not required to be submitted to the ERA until 30 September 2021 for the period ending 30 June 2021 following the practical completion of Stage 2 in August 2020. However, the Licensee received a request from the ERA for standing data and failed to submit it by the due date. Submission of standing data was recorded as late by the ERA for the 2020 year. • Confusion was noted between the ERA and the Licensee in regards to the requirement to lodge standing data as the practical completion for Stage 2 was after June 30. The Licensee, following a further request from the ERA, reported standing data on 13 October 2020 and was invoiced during the 2020/21 year for standing data charges. 	
<p>Recommendation:</p> <ul style="list-style-type: none"> • 2/2021 - BEI GRSF corporate systems implemented to ensure submission of Annual Compliance Reports have been effective since 2019 and the Governance Manager position has been created. However, further actions to ensure controls are established for the submission Standing Data to the ERA i.e. due 30 September annually. Specifically, the Licensee could consider the inclusion of this requirement in the BEI Critical Dates Register and detailing the requirements with the GRSF Asset Management Plan. 	<p>Action:</p> <ul style="list-style-type: none"> • Refer Post Audit Action Plan

125 Type [2]	OBLIGATION: Generation Licence, condition 3.8.1 and 3.8.2 / Electricity Industry Act, section 11 A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	Controls Rating:	Compliance Rating:
		NP	NR
	Finding – The ERA did not direct the Licensee to publish any information within the audit period.		
	Evidence – Review of ERA website and confirmation during interview with Operations Manager		
	Observations: <ul style="list-style-type: none"> • Nil 		
	Recommendation: <ul style="list-style-type: none"> • Nil 	Action: <ul style="list-style-type: none"> • Nil 	
126 Type [2]	OBLIGATION: Generation Licence, condition 3.7.1 / Electricity Industry Act, section 11 <i>All notices must be in writing, unless otherwise specified.</i>	Controls Rating:	Compliance Rating:
		A	1
	Finding – During the audit period the Licensee maintained records of communication with the Authority, primarily via mail or email communication. All responses were in writing and specific notices in relation to the Generation Licence were reviewed as part of the audit.		
	Evidence – Communications with ERA, Interview with Governance Manager		
	Observations: <ul style="list-style-type: none"> • Examples of communications provided refer Appendix 4 e.g. 275 		
	Recommendation: <ul style="list-style-type: none"> • Nil 	Action: <ul style="list-style-type: none"> • Nil 	

15 Electricity Industry Metering Code – Licence Conditions and Obligations			
324 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 3.3B If a user is aware of bi-directional electricity flows at a metering point that was not previously subject to a bi-directional flows or any changes in a customer's or user's circumstances in a metering point that will result in bi-directional flows, the user must notify the network operator within 2 business days.	Controls Rating:	Compliance Rating:
		NP	NR
Finding – Meters at the GRSF were subject to bi-directional flows. There was no change with respect to bi-directional flows during the audit period. The Licensee continued to import power from Synergy as required. Normal operating conditions required this only occurs when the plant is not generating sufficient electricity for site consumption.			
Evidence –Interview with SynergyRED Engineer & the First Solar Engineering Manager			
Observations: <ul style="list-style-type: none"> • Nil 			
Recommendation: <ul style="list-style-type: none"> • Nil 		Action: <ul style="list-style-type: none"> • Nil 	
339 Type	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 3.11(3) A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.	Controls Rating:	Compliance Rating:
		NP	NR

[NR]	<p>Finding – WPN had primary responsibility for the management and monitoring of meters. There were no outages or malfunctions identified during the audit period. Operations management monitor usage through production calculations and could generally identify an error.</p> <p>Evidence – Site Inspection & Interview with SynergyRED Engineer</p> <p>Observations:</p> <ul style="list-style-type: none"> Asset Management Agreement (Document Ref 27) notes that compliance with Wholesale Electricity Market Rules and the Metering Code It was noted that Western Power were responsible for installing and operating all meters located at the Mungarra Power Station outside of the premise of the Greenough River Solar Farm. Refer to map. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
<p>371 Type [NR]</p>	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.4(1)</p> <p>If there is a discrepancy between energy data held in a metering installation and in the metering database, the affected Code participants and the network operator must liaise to determine the most appropriate way to resolve the discrepancy.</p> <p>Finding – There were no discrepancies between energy data held in metering installation and in the metering database. As such compliance with this requirement cannot be made.</p> <p>Evidence – Interview with SynergyRED Engineer</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

372 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.5(1) A Code participant must not knowingly permit the registry to be materially inaccurate.	Controls Rating:	Compliance Rating:
		NP	NR
<p>Finding – The Licensee did not maintain any standing data or energy data in relation to the metering installations captured under the Metering Code. These activities were managed by the Network Operator and were outside the control of the Licensee. The Network operator maintained sole responsibility for the management of standing data within the registry and/or metering database of these obligations for the period 24 July 2018 to 31 July 2021;</p> <ul style="list-style-type: none"> • Maintenance and operation of the meters • Energy Data maintained in the metering database • Standing Data in the metering registry • All obligations defined in the Metering Code and the Wholesale Electricity Market Rules. <p>Evidence – Interview with SynergyRED Engineer</p> <p>Observations:</p> <ul style="list-style-type: none"> • Refer to map 339 			
Recommendation:		Action:	
<ul style="list-style-type: none"> • Nil 		<ul style="list-style-type: none"> • Nil 	
373 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 4.5(2) Subject to subclause 5.19(6), if a Code participant, other than a network operator, becomes aware of a change to, or inaccuracy in, an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	Controls Rating:	Compliance Rating:
		NP	NR
As per finding against obligation 372			
Recommendation:		Action:	
<ul style="list-style-type: none"> • Nil 		<ul style="list-style-type: none"> • Nil 	

388 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.4(2)	Controls Rating:	Compliance Rating:
	A user must, when reasonably requested by a network operator, assist the network operator to comply with the network operator's obligation under subclause 5.4(1).	NP	NR
<p>Finding – The network operator did not requested the assistance of the Licensee with respect to their metering installation during the audit period.</p> <p>Note: The Licensee has no access to meters and the Western Power meters located at the Mungarra Power Station are secured.</p> <p>Evidence – Site Inspection & Interview with SynergyRED Engineer</p> <p>Observations:</p> <ul style="list-style-type: none"> • Nil 			
Recommendation:		Action:	
<ul style="list-style-type: none"> • Nil 		<ul style="list-style-type: none"> • Nil 	
407 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.19(2)	Controls Rating:	Compliance Rating:
	A user must, to the extent that it is able, collect and maintain a record of the prescribed information in relation to the site of each connection point with which the user is associated	NP	NR
<p>Finding – The Licensee had no meters and all metering obligations were undertaken by Western Power. The only connection point was with Western Power, as such there was no requirement to collect and maintain records of the prescribe information, being site, address or customer attributes.</p> <p>Evidence – Site Inspection & Interview with SynergyRED Engineer</p> <p>Observations:</p> <ul style="list-style-type: none"> • Nil 			
Recommendation:		Action:	
<ul style="list-style-type: none"> • Nil 		<ul style="list-style-type: none"> • Nil 	

408 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.19(3)	Controls Rating:	Compliance Rating:
	Subject to subclauses 5.19(3A) and 5.19(6), the user must, within 1 business day after becoming aware of any change in an attribute described in subclause 5.19(2), notify the network operator of the change.	NP	NR
<p>Finding – GRSF as an electricity generator has not become aware of any change in attribute including address of the site, NMI of each connection point, customer name, customer address, and requirement for life support (Refer 5.19(2) in observation below.</p> <p>Evidence – Interview with Governance Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> 5.19(3A) and 5.19(6) specifically relate to Retail Licences with respect the Code of Conduct for Small Use Customers and the Metering Code Model* Service Level Agreement (SLA) GRSF as a <i>user</i> with an <i>access contract</i> 			
Recommendation:		Action:	
<ul style="list-style-type: none"> Nil 		<ul style="list-style-type: none"> Nil 	
410 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.19(6)	Controls Rating:	Compliance Rating:
	The user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute described in subclause 5.19(2) that results from the provision of standing data by the network operator to the user	NP	NR
<p>Finding – During the audit period there was no provision of standing data by the network operator to the user that resulted in the user notifying the network operator of a change in attributes.</p> <p>Evidence – Interview with Governance Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Nil 			
Recommendation:		Action:	
<ul style="list-style-type: none"> Nil 		<ul style="list-style-type: none"> Nil 	

416 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.21(5) A Code participant must not request a test or audit under subclause 5.21(1) unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	Controls Rating:	Compliance Rating:
		NP	NR
<p>Finding – No tests were requested during the audit period 24 July 2018 to 31 July 2021</p> <p>Evidence – Interview with Governance Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> • Nil 			
Recommendation:		Action:	
<ul style="list-style-type: none"> • Nil 		<ul style="list-style-type: none"> • Nil 	
417 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 5.21(6) A Code participant must not make a request under subclause 5.21(1) that is inconsistent with any access arrangement or agreement.	Controls Rating:	Compliance Rating:
		NP	NR
As per finding against obligation 416			
Recommendation:		Action:	
<ul style="list-style-type: none"> • Nil 		<ul style="list-style-type: none"> • Nil 	
448 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	Controls Rating:	Compliance Rating:
		A	1
<p>Finding – The Licensee had an ETAC and has complied with the communication rules, metrology procedures, model service level agreement (to the extent to which it applies to SRV GRSF and Western Power) and mandatory link criteria prescribed.</p> <p>GRSF had an ETAC with Western Power which outlines the obligations of both parties in relation to metering equipment and activities. The metering obligations applicable to GRSF under the ETAC are limited to maintaining relevant communications with Western Power and to provide any required access to its premises. Compliance with the requirement was confirmed by the Governance Manager and is noted in the GRSF AMP section 4.4.1.</p> <p>Evidence – Interview with SynergyRED Engineer, Governance Manager, 3, 78,100</p>			

	<p>Observations:</p> <ul style="list-style-type: none"> Evidence of compliance with this requirement provided and confirmed in discussions with management. A draft Generator Operating Protocol has been developed between the Licensee and Western Power Noted that the draft Generator Operating Protocol has been accepted and drafting was to be being finalised - refer minutes from WP fortnightly meeting 12/8/21. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
451 Type [NR]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(1)</p> <p>Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.</p>	<p>Controls Rating:</p> <p>A</p>	<p>Compliance Rating:</p> <p>1</p>
	<p>Finding – The GRSF site had well established communication processes such as a main telephone line & facsimile, mobile telephone coverage, remote system monitoring, and wireless internet access. Further operating arrangements defined in the ETAC with Western Power and the Western Power Portal ensure these obligations are met. During the audit period there were no communication issues arising.</p> <p>Evidence – Interview with Governance Manager, site visit</p> <p>Observations:</p> <ul style="list-style-type: none"> Internet was available 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> Nil 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
453 Type [2]	<p>OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(4)</p> <p>If requested by a network operator with whom it has entered into an access contract, the Code participant must notify its contact details to a network operator within 3 business days after the request.</p>	<p>Controls Rating:</p> <p>NP</p>	<p>Compliance Rating:</p> <p>NR</p>
	<p>Finding – During the period 24 July 2018 to 31 July 2021 the network operator did not request the licensee to provide its contact details. There were no changes made to Licensee's contact details.</p> <p>Evidence – Nil</p>		

	Observations: <ul style="list-style-type: none"> Nil 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
454 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.2(5) A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator under subclause 7.2(4) at least 3 business days before the change takes effect.	Controls Rating: NP	Compliance Rating: NR
	Finding – There were no changes in contact details for the Licensee during the audit period 24 July 2018 to 31 July 2021. Evidence – 3 Observations: <ul style="list-style-type: none"> The GRSF AMP defines this requirement Sale of Asset 10/4/2018 outside the scope of the Audit period. 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
455 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.5 A Code participant must subject to subclauses 5.17A and 7.6 not disclose, or permit the disclosure of, confidential information provided to it under or in connection with the Code and may only use or reproduce confidential information for the purpose for which it was disclosed or another purpose contemplated by the Code	Controls Rating: NP	Compliance Rating: NR
	Finding – During the period 24 July 2018 to 31 July 2021 the Licensee was not required to disclose or permit the disclosure of confidential information in connection to the Code. Evidence – Nil Observations: <ul style="list-style-type: none"> Nil 		

	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
456 Type [2]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 7.6(1) A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	Controls Rating: NP	Compliance Rating: NR
	As per finding against obligation 455		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
457 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(1) If any dispute arises between any Code participants then (subject to subclause 8.2(3)) representatives of disputing parties must meet within 5 business days after a notice given by a disputing party to the other disputing parties and attempt to resolve the dispute by negotiations in good faith.	Controls Rating: NP	Compliance Rating: NR
	Finding – There were no disputes arising during the audit period with Western Power or any other applicable <i>Code Participants</i> . Evidence – Nil Observations: <ul style="list-style-type: none"> Nil 		
	Recommendation: <ul style="list-style-type: none"> Nil 	Action: <ul style="list-style-type: none"> Nil 	
	As per finding against obligation 457		
458 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(2) If a dispute is not resolved within 10 business days after the dispute is referred to representative negotiations, the disputing parties must refer the dispute to a senior management officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	Controls Rating: NP	Compliance Rating: NR
	As per finding against obligation 457		

	Recommendation: • Nil	Action: • Nil	
459 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(3) If the dispute is not resolved within 10 business days after the dispute is referred to senior management negotiations, the disputing parties must refer the dispute to the senior executive officer of each disputing party who must meet and attempt to resolve the dispute by negotiations in good faith.	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 457		
	Recommendation: • Nil	Action: • Nil	
460 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.1(4) If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 457		
	Recommendation: • Nil	Action: • Nil	
461 Type [NR]	OBLIGATION: Generation Licence, condition 4.1.1 / Electricity Industry Metering Code, clause 8.3(2) The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	Controls Rating:	Compliance Rating:
		NP	NR
	As per finding against obligation 457		
	Recommendation: • Nil	Action: • Nil	

Note:

NP - not possible to provide a controls rating because no activity has taken place to exercise the obligation during the audit period

NR - Not applicable to audit period and as such compliance was not assessed

APPENDIX 2 – BEI GRSF ASSET MANAGEMENT REVIEW

OCTOBER 2021

TABLE 15 Audit Review Ratings and Recommendations

Note: Process & Policy Rating* (reads abbreviated as P&P* Rating)

1. ASSET PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<p><input type="checkbox"/> Assess the adequacy of the asset planning process <input type="checkbox"/> Assess the adequacy of the asset management plan <input type="checkbox"/> Assess whether the asset management plan is up-to-date and implemented in practice <input type="checkbox"/> Assess whether the asset management plan clearly assigns responsibilities and whether these have been applied in practice</p> <p>Key Process – <i>Asset planning strategies focuses on meeting customer needs in the most effective and efficient manner (delivering the right service at the right price).</i></p> <p>Outcome – <i>Asset planning is integrated into operational or business plans, providing a framework for existing and new assets to be effectively utilised and their service optimised.</i></p>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
1.1	OBLIGATION: Asset management plan covers the processes in this table		P&P* Rating: A
	<p>Findings – The Asset Management System (AMS) manual was comprehensive and incorporated the Asset Management Plan (AMP) developed and reviewed by SynergyRED and First Solar. The AMS and AMP documentation addressed the Audit Guideline requirements. This document was also internally audited by Synergy’s Corporate Office and recommendations were being enacted.</p> <p>Documents/Evidence – 1,2,3,4,6,10,11,13,15,16,17,27,28,35,36,37,38,101,109,121,124,185,196,200</p> <p>Observations:</p> <ul style="list-style-type: none"> • AMS manual comprehensive covering all requirements in the Audit Guidelines • Clear definition of responsibilities in AMS • The AMS and AMP clearly delineates the roles, responsibilities and business relationship between BEI GRSF, SynergyRED and First Solar • THE AMS and AMP clearly articulates the expectations of all parties. 		Performance Rating: 1
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil

1.2	OBLIGATION: Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	P&P* Rating: A	Performance Rating: 1
<p>Findings – Asset Planning was incorporated into operational and business planning processes. There was comprehensive engagement with stakeholders from the operations on the ground to the Board level. Communication between SynergyRED, BEI GRSF and First Solar was frequent and extensive. Engagement with Synergy, Water Corporation and WPC was regularly maintained.</p> <p>Documents/Evidence –1,2,3,9, 8,12,14,27,28,31,33,34,35,36,37,38,78,79,80,101,111,124, 201 to 235</p> <p>Observations:</p> <ul style="list-style-type: none"> Stakeholders including ERA, WPC, , Investors, Financiers, landowners, power purchaser and sub-contractors are all included BEI GRSF AMS is Board endorsed 			
<p>Recommendation:</p> <ul style="list-style-type: none"> None 		<p>Action:</p> <ul style="list-style-type: none"> Nil 	
1.3	OBLIGATION: Service levels are defined in the Asset Management Plan	P&P* Rating: A	Performance Rating: 1
<p>Findings –. Service levels were defined in the BEI GRSF AMP, FS GRSF AMP and O&M contracts. Comprehensive reporting protocols to SynergyRED and the Board were established.</p> <p>Documents/Evidence – 3, 27, 36,37, 39-77, 201 – 235, 162, 163, 164</p> <p>Observations:</p> <ul style="list-style-type: none"> Service levels were well defined in the contracts and reported on in monthly reports BEI GRSF entered into a long-term PPA with the Water Corporation and Synergy for the supply of all the energy generated by Stage1 & 2 of the GRSF respectively together with the associated Large-scale Generation Certificates (LGCs) and capacity credits FS, as O&M Operator had service level obligations to BEI GRSF around plant availability and generation performance that were specified in the O&M Agreements and subsequently the FS GRSF AMP. The SynergyRED GRSF AMP defined service levels required by the Asset Management Agreement including in respect of electricity market services and GRSF facility performance reporting. BEI GRSF monitored changes in the market (both commercial and regulatory) to determine when service levels needed to be updated. 			

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
1.4	OBLIGATION: Non-asset options (e.g. demand management) are considered	P&P* Rating: A	Performance Rating: 1
	<p>Findings – PPA was in place with Water Corporation and Synergy. WPC and AEMO controls the input to SWIS. There are agreements in place between Water Corp and Synergy in terms of meeting the contractual requirements for the 10MW and 30MW supply respectively. These are reported monthly from FS to SynergyRED to BEI GRSF and onto their customers. WPC and BEI GRSF has in place a Western Power Operating Control that controls input to SWIS. Any non - asset options is considered by the BEI GRSF in its yearly OPEX/CAPEX Work Planner as per the process outlined in the AMP.</p> <p>Documents/Evidence – 7,1,2,10,11,18,25, 26, 27,28,31,33,34,35,78,79,199</p> <p>Observations:</p> <ul style="list-style-type: none"> Runback protocols in place with WPC. SynergyRED as the Asset Manager regularly considered business improvement opportunities and evaluated business cases. SynergyRED and the BEI Group have entered into a Development Services Agreement (DSA). The DSA identified market opportunities for new renewable generation assets or the expansion of existing assets and evaluated them against criteria determined by the BEI Group investors. Noted the licensee developed the Asset Management framework on the requirements of ISO 55000 Comprehensive processes established for asset planning were evidenced, responsibilities were well defined, Business Plans reinforced mission statement objectives with respect to customer needs. Operational Plans for Stage 1 and 2 framework aligned with business objectives. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
1.5	OBLIGATION: Lifecycle costs of owning and operating assets are assessed	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Life cycle costs of both stages were developed and is utilised for planning and projecting costs until 2024. This was monitored on a monthly basis and presented to the Board. Via VMA report.</p> <p>Documents/Evidence – 15,16,17,109,173 to 177,195,196, 236 to 269</p>		

	<p>Observations:</p> <ul style="list-style-type: none"> O&M have comprehensive maintenance schedules. Operators carry the maintenance and operating costs. Maintenance contracts ensure equipment is kept in good operating condition. VMA reports to BEI GRSF monitors the O&M costs and liquidity on a monthly and annual basis 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
1.6	<p>OBLIGATION: Funding options are evaluated</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – The AMP clearly articulated the financial models and shareholders. Funding was agreed with an APRA approved financial institution. Funding can be readily arranged and negotiated with Board and Shareholders. The AMP and BEI GRSF Business Plan set out the financial justification model and process by which any new assets was to be evaluated and was presented to the Board. The Board ultimately makes the decision.</p> <p>Documents/Evidence – 1,2,3,8,13,14,9,27,28,35,36,37,38,195,200,236 - 269</p> <p>Observations:</p> <ul style="list-style-type: none"> The GRSF AMP and the BEI GRSF Business were reviewed and the processes with Asset Manager. The base case financial model for the GRSF allowed for funding for known major financial expenditure items such as compliance costs, O&M costs, adequate funding for the Asset Manager, sustaining capital expenditure, decommissioning and site rehabilitation. In addition to the base case modelling there was an annual budget update and business plan review that is approved by the BEI GRSF Board. Specific details were commercial in confidence 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

1.7	OBLIGATION: Costs are justified and cost drivers identified	P&P* Rating: A	Performance Rating: 1
<p>Findings – Costs were well identified and justified. Costs and cost drivers were monitored vigilantly and reported all the way to the Board.</p> <p>Documents/Evidence – 1,2,3,10,13,15,16,17,27,28,33,34,36,37,38,79,101,109, 173 to 177, 195, 196, 201 to 269.</p> <ul style="list-style-type: none"> • Observations: The plant is new and contracts structured with the costs clearly articulated. Contract performance incentives were established. VMA reports provide detailed financial monitoring. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
1.8	OBLIGATION: Likelihood and consequences of asset failure are predicted	P&P* Rating: A	Performance Rating: 1
<p>Findings – Asset failure risks were covered by first Solar and evident in site risk registers. Risk registers were maintained at overall and project level and contingency plans were considered in planning and annually reviewed.</p> <p>Documents/Evidence – 1,2,3,10,11,13,14,15,16,17,18,19,20,21,23,24,28,35,38,79,101,109, 181,182,183, 95,196</p> <p>Observations:</p> <ul style="list-style-type: none"> • Solar Panel spares readily available on site. SynergyRED continues to monitor availability and solar panels and purchase accordingly to meet demand to 2050 • O&M contractors continue to meet performance targets as established in their contracts • Faulty plant has been replaced under warranty and in future the risk lies mainly with the operators. • Covid-19 had minimum effect on delivery of the project. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

1.9	OBLIGATION: Asset management plan is regularly reviewed and updated	P&P* Rating: A	Performance Rating: 1
<p>Findings – AMP for SyngeryRed and First Solar reviewed annually and submitted to BEI GRSF.</p> <p>Documents/Evidence – 1,2,3,10,11,13,27,38,121,185</p> <p>Observations: AMP scheduled to be reviewed every year and internal audits carried out by Synergy Corporate.</p>			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

2. ASSET CREATION AND ACQUISITION		PROCESS & POLICY RATING*	PERFORMANCE RATING
<p><input type="checkbox"/> Assess the adequacy of policies and procedures covering the creation and acquisition of assets</p> <p><input type="checkbox"/> Select a sample of asset creations/ acquisitions over the review period and confirm adequate procedures have been followed and actual costs are as predicted</p> <p>Key Process – Asset creation/acquisition is the provision or improvement of assets.</p> <p>Outcome – The asset acquisition framework is economic, efficient and cost-effective; it reduces demand for new assets, lowers service costs and improves service delivery.</p>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
2.1	OBLIGATION: Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options		P&P* Rating: A
	Performance Rating: 1		
	<p>Findings – Stage 1 and Stage 2 full project evaluation to end of life, including CAPEX, OPEX and Asset Disposal.</p> <p>Documents/Evidence –1,2,3,8,13,14,9,27,28,35,36,37,38,97, 124,188,200</p> <p>Observations: BEI GRSF had in place a full project evaluation financial model and had been presented to Board.</p>		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
2.2	OBLIGATION: Evaluations include all life-cycle costs		P&P* Rating: A
	Performance Rating: 1		
	<p>Findings – The first stage was already well established. The second stage of the solar farm was built and commissioned during the audit period. A detailed life-cycle cost model was developed prior to the construction and utilised as a basis of its O&M contract with First Solar.</p> <p>Documents/Evidence – 1,2,3,8,13,14,9,27,28,35,36,37,38,109,188, 195</p> <p>Observations:</p> <ul style="list-style-type: none"> BEI GRSF had conducted a comprehensive due diligence for both stages Detailed life cycle costs form the basis of comprehensive financial reporting and monitoring. 		

	<ul style="list-style-type: none"> Stage 1 GRSF has detailed life cycle costs from 2012 to 2042 Stage 2 GRSF has detailed life costs from 2020 to 2050 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
2.3	OBLIGATION: Projects reflect sound engineering and business decisions	P&P* Rating: A	Performance Rating: 1
	<p>Findings – SynergyRed and First Solar contracts, for AMS and O&M services respectively were performance based and decision making process took into consideration engineering, business and risk aspects of the projects.</p> <p>Documents/Evidence –1,2,3,8,13,14,9,27,28,35,36,37,38,97, 124, 200 ,201 to 235, 236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> SynergyRed and First Solar had very good asset management, business and engineering experience which is utilized to ensure decisions made for the facility are thoroughly researched and resourced. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
2.4	OBLIGATION: Commissioning tests are documented and completed	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Stage 1 is well established and under operation for 9 years. Stage 2 GRSF has completed construction and is now into 12 months of operations. GRSF commissioning was fully documented at SynergrRED office in Perth.</p> <p>Documents/Evidence – 7,13,18,29,35,36,37,38,79,78,93,97,101,109,112,113,115,116, 197,198</p> <p>Observations:</p> <ul style="list-style-type: none"> ProjectWise was used during the construction phase as the primary document control system, supported by GHD and now transferred to SynergyRED BEI GRSF held configuration files. First Solar had a service agreement with Motherwell who commissioned the controls system. 		

	<ul style="list-style-type: none"> Smooth transition between RCR and First Solar / Juwi during the construction phase with delays minimised when RCR went into administration. BEI GRSF effectively exercised its step in rights. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
2.5	OBLIGATION: Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	P&P* Rating: A	Performance Rating: 1
	Findings – O&M agreements and Asset Management Plans addressed obligations and these were reflected in procedures and comprehensive reporting. The Licensee was aware of legal/environmental and safety obligations and proactively managed these requirements.		
	Documents/Evidence – 1,2,3,4,8,9,10,11,12,13,14,19,20,21,24,27,28,29,30,31,35,36,37,38,80,84,93,100,178,179,180,184,185,200		
	Observations: <ul style="list-style-type: none"> SynergyRED and First Solar have established protocols for annual reviews of their respective obligations as outlined in their AMPs. INTELEX and PV Tools used on site 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

3. ASSET DISPOSAL		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering the identification of under-performing assets, disposal of assets and replacement strategy <input type="checkbox"/> Determine whether a regular review of the performance of assets is undertaken <input type="checkbox"/> Select a sample of disposals over the review period and confirm adequate procedures have been followed Key Process – <i>Asset disposal is the consideration of alternatives for the disposal of surplus, obsolete, under-performing or unserviceable assets.</i> Outcome – <i>The asset management framework minimises holdings of surplus and underperforming assets and lowers service costs. The cost-benefits of disposal options are evaluated.</i>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
3.1	OBLIGATION: Under-utilised and under-performing assets are identified as part of a regular systematic review process		P&P* Rating: A
	Findings – Systematic review of GRSF 1 and GRSF 2 assets was reported monthly by First Solar to SynergyRED to BEI GRSF. Underperforming equipment was replaced under warranty. Documents/Evidence – 1,2,3,10,11,13,14,15,16,17,27,28,29,35,36,37,38,39 to 77, 79,97,101,109, 185, 188,196,197 Observations: <ul style="list-style-type: none"> • Stage 1 is well established and operating. • Stage 2 has moved out of construction into full operation. • SynergyRED and FS through monthly reports monitor performance of assets and replace accordingly. 		Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> • None 		Action: <ul style="list-style-type: none"> • Nil
3.2	OBLIGATION: The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken		P&P* Rating: A
	Findings – Monthly reports document performance and actions. Faulty equipment was replaced under warranty. Documents/Evidence –1,2,3,10,11,13,14,15,16,17,27,28,29,35,36,37,38,39 to 77, 79,97,101,109, 185, 188,196,197		Performance Rating: 1

	<p>Observations:</p> <ul style="list-style-type: none"> • First Solar reports on a monthly basis to SynergyRED and all under performances / utilisations are discussed in detail and corrective actions taken. These are monitored on an on-going monthly basis • SynergyRED also conducts monthly visits to site 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
3.3	<p>OBLIGATION: Disposal alternatives are evaluated</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – Greenough River Solar Farm Financial Model considered disposal and allowed for site clearing of all above ground works and disposal of panels. Stage 1 is 9 years into operation and Stage 2 had been operating for 12 months. Disposal was not a consideration during the audit period as both stages are in early years of operation.</p> <p>Documents/Evidence – 1,2,3,10,11,13,14,15,16,17,27,28,29,35,36,37,38,39 to 77, 79,97,101,109, 185, 188, 195, 196,197</p> <p>Observations:</p> <ul style="list-style-type: none"> • Consumables and spares were observed while on site. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
3.4	<p>OBLIGATION: There is a replacement strategy for assets</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – BEI GSRF developed a comprehensive life cycle financial model with defined asset replacement. Under the O&M contract First Solar executed this in conjunction with SynergyRED.</p> <p>Documents/Evidence – 1,2,3,10,11,13,14,15,16,17,27,28,29,35,36,37,38,39 to 77, 79,97,101,109, 173 to 177, 185, 188, 195, 196,197</p> <p>Observations:</p> <ul style="list-style-type: none"> • Comprehensive maintenance schedules developed by First Solar • Operation and maintenance of both stages of the Solar Farm was reported to SynergyRED with performance targets clearly defined. 		

	Recommendation: <ul style="list-style-type: none">• None	Action: <ul style="list-style-type: none">• Nil
--	---	--

4. ENVIRONMENTAL ANALYSIS		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Review achievement of performance and service standards over the review period <input type="checkbox"/> Investigate any statutory or regulatory breaches and assess corrective action taken <input type="checkbox"/> Review the adequacy of reporting and monitoring tools Key Process – Environmental analysis examines the asset management system environment and assesses all external factors affecting the asset management system. Outcome – The asset management system regularly assesses external opportunities and threats and identifies corrective action to maintain performance requirements.		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
4.1	OBLIGATION: Opportunities and threats in the asset management system environment are assessed		P&P* Rating: A
	<p>Findings – BEI GRSF, SynergyRED and First Solar identified risk management approach in their respective AMPs. Risk Management Policy, Procedures and Risks Summary documentation established and monitored.</p> <p>Documents/Evidence – 1,2,3,7,9,10,11,12,13,14,20,21,23,24,27,28,29,30,36,37,38,39-77,80,93,94,95,98,105, 121, 125, 146, 161,162,163,164,178,179,180, 181, 182, 183, 184, 189</p> <p>Observations:</p> <ul style="list-style-type: none"> • Sales and O&M contracts are well defined and implemented. • Good relations with stakeholders • Clean renewable generation • Good response to equipment failures by O&M and AMS Contractors. • Good use of computerised risk management system, EMPOWER. 		
	Recommendation:	Action:	
	<ul style="list-style-type: none"> • None 	<ul style="list-style-type: none"> • Nil 	

4.2	OBLIGATION: Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	P&P* Rating: A	Performance Rating: 1
<p>Findings – Performance standards were monitored and reported in O&M monthly reports.</p> <p>Documents/Evidence – 19,32,36,37, 39-77,80,93,94,95,96,98,105, 121</p> <p>Observations:</p> <ul style="list-style-type: none"> • Performance standards were either met or exceeded for GRSF Stage 1. • GRSF stage 2 once fully operational, met or exceeded its performance targets. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
4.3	OBLIGATION: Compliance with statutory and regulatory requirements	P&P* Rating: A	Performance Rating: 1
<p>Findings – Compliance with statutory and regulatory was monitored and reported to BEI-GRSF board. No late penalties or infringe notices observed during the audit period.</p> <p>Documents/Evidence – 5,29,39-77,81,83,84,93,94,95,109,114,115,116, 117,118,119,120,121,122,123,151,190,191, 201 to 235</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M Contractor reports to SynergyRED always on time. • Good relation with customers and regulatory authorities. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

4.4	OBLIGATION: Service standard (customer service levels etc.) are measured and achieved.	P&P* Rating: A	Performance Rating: 1
<p>Findings – SCADA system recorded performance, as does WPC, no major issues were identified. Customer services levels are well defined and met by the Licensee as an unscheduled generator, Contractual and performance criteria have been met or exceeded. Customer service levels were measured and achieved and documented in the monthly AMA Reports and annual reports.</p> <p>Documents/Evidence – 5,29,39-77,81,83,84,93,94,95,109,114,115,116, 117,118,119,120,121,122,123,151,190,191, 201 to 235</p> <p>Observations:</p> <ul style="list-style-type: none"> • Customers have raised no issues or concerns • Service levels were well defined in the contracts and reported on in monthly reports • BEI GRSF entered into a long-term PPA with the Water Corporation and Synergy for the supply of all the energy generated by Stage1 & 2 of the GRSF respectively together with the associated Large-scale Generation Certificates (LGCs) and capacity credits • FS, as O&M Operator had service level obligations to BEI GRSF around plant availability and generation performance that were specified in the O&M Agreements. • The SynergyRED GRSF AMP defined service levels required by the Asset Management Agreement including in respect of electricity market services and GRSF facility performance reporting. • BEI GRSF monitored changes in the market (both commercial and regulatory) to determine when service levels needed to be updated. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

5. ASSET OPERATIONS		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering operations functions <input type="checkbox"/> Assess the adequacy of staff resourcing and training <input type="checkbox"/> Confirm the policies and procedures have been followed during the review period by examining the asset register, observing operational procedures, analysing costs, etc. <input type="checkbox"/> Assess the significance of exceptions identified and whether adequate corrective action has been taken Key Process – Asset operations is the day-to-day running of assets (where the asset is used for its intended purpose). Outcome – The asset operation plans adequately document the processes and knowledge of staff in the operation of assets so service levels can be consistently achieved.		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION	P&P* Rating:	Performance Rating:
5.1	OBLIGATION: Operational policies and procedures are documented and linked to service levels required Findings – Policies and procedures were established by O&M Contractor and met service levels required. Documents/Evidence – 1,2,3,4,11,12,10,13,14,18,25,26,29,32,36,37,39 – 77,78,79,80,94,95,97,105,162, 163,164,170,171,172, 185, 186,187 Observations: <ul style="list-style-type: none"> Solar Farm achieved better availability than contracted 	A	1
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
5.2	OBLIGATION: Risk management is applied to prioritise operations tasks Findings – Risk management was applied comprehensively and demonstrated at the operational and management levels. Documents/Evidence – 1,2,3,4,18,21,23,25,26,29,30,39 to 77, 94,95,98,105,170,171,172, 183,184, 85,189,192,193,194, 201-235	A	1

	<p>Observations:</p> <ul style="list-style-type: none"> • SynergyRED and First Solar had risk management policies in place and applied • Noted Board review of risk management processes and legislative amendments (233) 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
5.3	<p>OBLIGATION: Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – The asset register for the Licensee was defined by two components. The Licensee's documented Asset Register was primarily financially focussed, recorded all the financial information, location and asset type. The MAXIMO systems, further detailed of asset components, include an assessment of the assets physical/structural condition and location. This system was reviewed during the site visit.</p> <p>Documents/Evidence – 101, CMMS:Maximo (Viewed on site)</p> <p>Observations:</p> <ul style="list-style-type: none"> • Financial Register kept in SynergyRED office. Data located in Xero • The Financial Asset register referred to asset information at a high level and the Maximo system allowed for more specific component related asset information. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
5.4	<p>OBLIGATION: Accounting data is documented for assets</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – Assets were well documented in the accounts and financial reports summarised monthly to Boards</p> <p>Documents/Evidence – 8,15,16,17,28,38,30 to 77,79,97,101,105,109,236 to 269</p>		

	<p>Observations:</p> <ul style="list-style-type: none"> Financial information well recorded by SynergyRED and reported to Board. Performance payments to First Solar incentivised asset performance. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
5.5	<p>OBLIGATION: Operational costs are measured and monitored</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – Operational costs were measured, recorded, monitored and reported on a monthly basis.</p> <p>Documents/Evidence – 15,16,17,109,188, 195,196,201 to 235, 236 to 269.</p> <p>Observations:</p> <ul style="list-style-type: none"> O&M costs were incorporated in the O&M Contracts Unscheduled O&M costs are monitored and reported in monthly and annual reports Initial capital investment costs were financed and well monitored by shareholders Small workforce required for operational and maintenance purposes. Most operational reporting by First Solar is in performance terms rather than dollars. Financials are reported and budgeted in financial reports by SynergyRED to BEI GRSF 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	
5.6	<p>OBLIGATION: Staff resources are adequate and staff receive training commensurate with their responsibilities</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – Employees and Contractors were competent and familiar with the operations and plant requirements. Training and resourcing considerations were evident. Training records were reviewed and are referenced below. Additionally, training and resourcing needs were confirmed by the Governance Manager and Site Manager Technician (First Solar).</p> <p>Documents/Evidence – 1,2,3,12,13,14,29,36,37,125,146,151,165,166,167,168,169</p>		

	Observations: <ul style="list-style-type: none">• Refresher trainings closely monitored by First Solar and SynergyRED• O&M Agreements for Stage 1 and 2 facilitate the fulfilment of training needs by FS.• FS managed its resourcing strategy for the GRSF in accordance with FS management systems• SynergyRED did not conduct works at GRSF, however they must provide 'competent' personnel with all the base line training and skills necessary to perform their roles.• SynergyRED provided its own baseline training for its personnel and maintained its own training registers to ensure appropriate currency for site skills.
	Recommendation: <ul style="list-style-type: none">• None

6. ASSET MAINTENANCE		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess the adequacy of policies and procedures covering maintenance functions <input type="checkbox"/> Confirm the policies and procedures have been followed during the review period by examining maintenance schedules, analysing costs, etc. <input type="checkbox"/> Assess the significance of exceptions identified and whether adequate corrective action has been taken Key Process – <i>Asset maintenance is the upkeep of assets.</i> Outcome – <i>The asset maintenance plans cover the scheduling and resourcing of the maintenance tasks so work can be done on time and on cost.</i>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
6.1	OBLIGATION: Maintenance policies and procedures are documented and linked to service levels required	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Maintenance policies and procedures were well documented, Comprehensive monthly reports provided to SynergyRED.</p> <p>Documents/Evidence –1,2,3,4,9,11,12,10,13,14,18,25,26,29,32,36,37,39 – 77,78,79,80,94,95,97,105,162, 163,164,170,171,172,185, 186,187,192,193,194</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M contractor utilised its experience on similar facilities, was backed up by global databases and had the support of reputable OEM suppliers to ensure comprehensive maintenance procedures and practices in place. • Maintenance was continuous and aimed at keeping plant as new (subject to normal panel lifecycle performance degradation). • First Solar utilises CMMS, namely Maximo with SharePoint. • Good control of maintenance documentation • The maintenance and repair strategy was focused on minimising generation losses. This was achieved by planning scheduled maintenance at times of low or no generation. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

6.2	OBLIGATION: Regular inspections are undertaken of asset performance and condition	P&P* Rating:	Performance Rating:
		A	1
<p>Findings – Regular inspections were undertaken and performance reported on in monthly reports. Solar farm servicing and inspection was an ongoing process with the intent to keep the system in “as new” condition. Solar farm was manned during working hours and inspected and maintained on an ongoing process. Asset performance was monitored with SCADA and reported upon in monthly reports.</p> <p>Documents/Evidence – 1,2,3,4,9,11,12,10,13,14,18,25,26,29,32,36,37,39 – 77,78,79,80,94,95,97,105, 162, 163,164,170,171,172, 173, 174, 175, 176,177,185, 186,187,192,193,194</p> <p>Observations:</p> <ul style="list-style-type: none"> • Regular on-site inspections and continuous condition and performance monitoring ensures performance. • SCADA provided communication interface with the Power Plant Controllers and all critical equipment within the solar farm 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
6.3	OBLIGATION: Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	P&P* Rating:	Performance Rating:
		A	1
<p>Findings – Maintenance was well documented and processes for the continuous review of maintenance practices were established. Maintenance activities were reported monthly to SynergyRED incorporating future maintenance activities and resources.</p> <p>Documents/Evidence – 1,2,3,4,9,11,12,10,13,14,18,19, 23,24, 25,26,29,32,36,37,39 – 77,78,79,80,94,95,97,105, 162, 163,164,170,171,172, 173, 174, 175, 176,177,185, 186,187,192,193,194</p> <p>Observations:</p> <ul style="list-style-type: none"> • Weekly meetings held between on-site and off-site personnel of O&M contractor. • Detailed maintenance schedules developed annually and reviewed on an on-going basis. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

6.4	OBLIGATION: Failures are analysed and operational/maintenance plans adjusted where necessary	P&P* Rating: A	Performance Rating: 1
<p>Findings – Stage 1 Failures were replaced with spares when found faulty. Stage 2 failures replaced under warranty. Monthly Reports contained detailed history of failures and amendments to operational plans.</p> <p>Documents/Evidence – 1,2,3,4,9,11,12,10,13,14,18,19, 23,24, 25,26,29,32,36,37,39 – 77,78,79,80,94,95,97,105, 162, 163,164,170,171,172, 173, 174, 175, 176,177,185, 186,187,192,193,194, 201 to 235</p> <p>Observations:</p> <ul style="list-style-type: none"> • SynergyRED has ensured spares availability to end of life. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
6.5	OBLIGATION: Risk management is applied to prioritise maintenance tasks	P&P* Rating: A	Performance Rating: 1
<p>Findings – Risk management processes for the prioritisation of maintenance tasks were applied comprehensively</p> <p>Documents/Evidence – 1,2,3,4,18,21,23,25,26,29,30,39 to 77, 94,95,98,105,170,171,172, 183,184, 85,189,192,193,194,</p> <p>Observations:</p> <ul style="list-style-type: none"> • The maintenance system used on site prioritises the maintenance tasks accordingly. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

6.6	OBLIGATION: Maintenance costs are measured and monitored	P&P* Rating: A	Performance Rating: 1
<p>Findings – Maintenance costs were measured, recorded, monitored and reported on a monthly basis.</p> <p>Documents/Evidence –15,16,17,109,188, 195,196,201 to 235, 236 to 269.</p> <p>Observations:</p> <ul style="list-style-type: none"> • O&M costs were incorporated in the O&M Contracts • Unscheduled O&M costs are monitored and reported in monthly and annual reports • Small workforce required for operational and maintenance purposes. External contractors on site for specialist maintenance tasks. • Most reporting by First Solaris in performance terms rather than dollars. • Financials are reported and budgeted in financial reports by SynergyRED to BEI GRSF 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

7. ASSET MANAGEMENT INFORMATION SYSTEM		PROCESS & POLICY RATING*	PERFORMANCE RATING
<p><input type="checkbox"/> Assess the adequacy of policies and procedures covering the general control and security of the computer systems used to provide management information on compliance with service standards / licence obligations</p> <p><input type="checkbox"/> Confirm management reports on service standards / licence obligations are reviewed and substantial exceptions to service standards / licence obligations are promptly followed up and implemented</p> <p>Key Process – An asset management information system is a combination of processes, data and software supporting the asset management functions.</p> <p>Outcome – The asset management information system provides authorised, complete and accurate information for the day-to-day running of the asset management system. The focus of the review is the accuracy of performance information used by the licensee to monitor and report on service standards.</p>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
7.1	OBLIGATION: Adequate system documentation for users and IT operators		P&P* Rating: A
	Performance Rating: 1		
	<p>Findings – Both the Licensee and the O&M Contractors had detailed well understood IT systems in place.</p> <p>Documents/Evidence – 1,2,3,10,11,12,13,14,19,22,25,26,28,29,36, 37, 39-77, 78, 94, 95, 96, 105,125,135,146,150,151,161,165,166,167,168,169,185, 236-269,</p> <p>Observations:</p> <ul style="list-style-type: none"> • Staff are conversant with systems in place and refresher training and e learning are scheduled timely. • SCADA was automated • Reporting detailing system data and performance was well prepared, brief with adequate information. Reporting and was evidenced from the O&M operators monthly, AMA reports from SynergyRED to BEI monthly. • O&M Agreement for Stage 1 and 2 required that FS maintained a CMMS, which was delivered through a variety of means under the FS Management Systems including the FS Maximo CMMS and the SCADA. • Instances where reporting systems encountered technical issues were identified and rectified promptly and data was retrievable 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

7.2	OBLIGATION: Input controls include suitable verification and validation of data entered into the system	P&P* Rating: A	Performance Rating: 1
<p>Findings – Data entry, acquisition and reporting was automated and cross checked by other parties</p> <p>Documents/Evidence – 22,25,26</p> <p>Observations:</p> <ul style="list-style-type: none"> • Reporting based on outputs from SCADA systems • O&M statistical reports automated. • Financial reporting all automated. • The protection relays provided electrical protection functions, local control intelligence, monitoring abilities and communications to the SCADA System. • Well established internal review processes, reporting and communication utilised by the Licensee 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
7.3	OBLIGATION: Security access controls appear adequate, such as passwords	P&P* Rating: A	Performance Rating: 1
<p>Findings – Security controls were adequate</p> <p>Documents/Evidence – 1, 22,25,26, 95, 105,125,146</p> <p>Observations:</p> <ul style="list-style-type: none"> • Firewall and password protections in place • During the Audit period, the Licensee commenced a program to improve cyber security across its portfolio of assets and related systems. • Demonstrated effective resilience analysis and contingency planning with the aim of preventing disruption from cyber-attacks to the business-as-usual • Additionally aim was to ensure that systems safety can be restored quickly and operations re-established promptly in the event of a successful cyber-attack 			

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
7.4	OBLIGATION: Physical security access controls appear adequate	P&P* Rating: A	Performance Rating: 1
	Findings – Access was restricted and locked when unattended. Documents/Evidence – 22,25,26, 186,187 Observations: <ul style="list-style-type: none"> Entry to site was well hidden, restricted by security passes and secured with cameras and fencing Employees and Contractors are routinely present Comprehensive induction training on site entry. Remoteness reduces people accessing site. Local landowners are aware of normal activity and report unusual activity if observed. Master keying on sites 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
7.5	OBLIGATION: Data backup procedures appear adequate and backups are tested	P&P* Rating: A	Performance Rating: 1
	Findings – Back-ups were carried out on site and at Corporate Offices. Documents/Evidence – 22,25,26,28,95, 96, 105 Observations: <ul style="list-style-type: none"> Corporate server tested on monthly basis 		

	<ul style="list-style-type: none"> • Specific reference in Business Plan to risks in relation to general control and security of the computer systems used to provide management information on compliance with service standards / licence obligations. In particular backup processes and access to required resources. • The SCADA System information was accessed within the BOP and solar farm through the SCADA Workstations electronically and output it to the printers. There was access to dynamic data or historical stored data • BEI GRSF maintained a copy of all current as-built engineering drawings, maintenance manuals, software and configuration data at the BEI Group headquarters so that BEI GRSF would be able to access all necessary information to step-in and takeover the GRSF operations, either directly or through an alternate O&M contractor if it was not possible to proceed with the FS O&M Contract at any time in the future. • FS GRSF Information Management Plan detailed backup procedures. Reference to backup procedures was not incorporated in the FS GRSF AMP • FS maintained hardcopy and e-file of documentation and all performance data retrieved from SCADA was stored and backed up by the O&M Provider's cloud based storage warehouse. 		
	Recommendation: <ul style="list-style-type: none"> • None 	Action: <ul style="list-style-type: none"> • Nil 	
7.6	OBLIGATION: Computations for licensee performance reporting are accurate	P&P* Rating: A	Performance Rating: 1
	Findings – Computations for licensee performance reporting were mainly automated and proven Documents/Evidence – 36,37,38 to 77 Observations: <ul style="list-style-type: none"> • O&M contractor provides licensee with performance reporting as per O&M contract. 		
	Recommendation: <ul style="list-style-type: none"> • None 	Action: <ul style="list-style-type: none"> • Nil 	

7.7	OBLIGATION: Management reports appear adequate for the licensee to monitor licence obligations	P&P* Rating: A	Performance Rating: 1
<p>Findings – Reporting was adequate with monthly contractor and Board reports for management. Exception reports are alarmed and investigated via SCADA</p> <p>Documents/Evidence – 38 to 77, 94,95,105, 201 to 235</p> <p>Observations:</p> <ul style="list-style-type: none"> • Mainly based on SCADA. • Intermittent supply so no obligation for availability to WPC and Customers • Noted Governance Manager presented to Board Cyber security matters in relation to operation, risks and compliance.(235) 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
7.8	OBLIGATION: Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	P&P* Rating: A	Performance Rating: 1
<p>Findings – SynergyRED and First Solar corporate system had a high level of security measures to protect asset management data from external threats.</p> <p>Documents/Evidence – 1,22,25,26,95,105, 217, 234, 235</p> <p>Observations:</p> <ul style="list-style-type: none"> • Firewalls were in place to prevent external access to computers • Board advised of Australian Energy Sector Cyber Security Framework • Board endorsed BEI Cyber Security Policy developed • Cyber Security review established and improvements actioned as opportunities identified • Review evidenced in GRSF monthly meetings, VMA Reports and Board Minutes • 			

	Recommendation: <ul style="list-style-type: none">• None	Action: <ul style="list-style-type: none">• Nil
--	---	--

8. RISK MANAGEMENT		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Assess whether the risks that most affect the management and performance of the assets have been identified <input type="checkbox"/> Assess the adequacy of policies and procedures covering risk management <input type="checkbox"/> Assess whether the risk management policies and procedures have been applied in practice <input type="checkbox"/> Assess the adequacy of staff understanding and training on risk management Key Process – Risk management involves the identification of risks and their management within an acceptable level of risk. Outcome – The risk management framework effectively manages the risk that the licensee does not maintain effective service standards		A	1
No.	2021 AUDIT REPORT EVIDENCE / VERIFICATION/FINDING/ACTION		
8.1	OBLIGATION: Risk management policies and procedures exist and are applied to minimise internal and external risks		P&P* Rating: A
	Performance Rating: 1 Findings – Risk management policies and procedures were established by the Licensee and Contractors. Risk management systems utilised by parties were evident. Documents/Evidence – 1,2,3,9,0,11,12,13,14,19,20,21,22,23,24,25,27,28,29,30, 39 to 77, 94,95,96,98, 105, 121,124,151,185,189, Observations: <ul style="list-style-type: none"> • Risk management was well used by all parties. • Annual reviews of risk policies and procedures evident. • Internal audits also scheduled and evidenced. 		
	Recommendation:		Action:
	<ul style="list-style-type: none"> • None 		<ul style="list-style-type: none"> • Nil
8.2	OBLIGATION: Risks are documented in a risk register and treatment plans are implemented and monitored		P&P* Rating: A
	Performance Rating: 1 Findings – Risk registers and treatment plans viewed at Corporate office and on site. Effectively used to identify and mitigate risks. Documents/Evidence – 23, 39 to 77, 94,95,181,182,183,184,185		

	<p>Observations:</p> <ul style="list-style-type: none"> • Global experience of similar solar panels and inverters available to assess risks • Solar inverters and PV panels backed by reputable global manufacturers with extensive experience. • Risks are reported monthly and corrective actions implemented. • No significant safety incidents experienced 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
8.3	<p>OBLIGATION: Probability and consequences of asset failure are regularly assessed</p>	<p>P&P* Rating: A</p>	<p>Performance Rating: 1</p>
	<p>Findings – Licensee and O&M Contractor have established annual internal audits and risk registers.</p> <p>Documents/Evidence – 2,11,13,79,178,179,180,185</p> <p>Observations:</p> <ul style="list-style-type: none"> • Annual internal audits and reviews of AMPs give both the Licensee and O&M Contractor a very good mechanism by which to analyse potential asset failures. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> • None 	<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

9. CONTINGENCY PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Determine whether contingency plans have been developed and are current <input type="checkbox"/> Determine whether contingency plans have been tested. If so, review the results to confirm any improvements identified have been implemented. Key Process – <i>Contingency plans document the steps to deal with the unexpected failure of an asset.</i> Outcome – <i>Contingency plans have been developed and tested to minimise any major disruptions to service standards.</i>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
9.1	OBLIGATION: Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks		P&P* Rating: A
	Findings – Plans were in place for emergencies and reinstatement. Documents/Evidence – 2,11,13,19, 24, 29, 32, 96,185, Observations: <ul style="list-style-type: none"> • Curtailment by WPC or weather conditions is beyond their control • Within First Solar global experience readily available to remotely operate and maintain the site. 		Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> • None 		Action: <ul style="list-style-type: none"> • Nil

10. FINANCIAL PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Obtain a copy of the financial planning, budgeting and reporting process and assess its effectiveness <input type="checkbox"/> Obtain a copy of the current financial plan (including budget/actual) and assess whether the process is followed Key Process – Financial brings together the financial elements of the service delivery to ensure its financial viability over the long term. Outcome – The financial plan is reliable and provides for the long-term financial viability of the services.		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION		
10.1	OBLIGATION: The financial plan states the financial objectives and identifies strategies and actions to achieve those	P&P* Rating: A	Performance Rating: 1
	<p>Findings – Licensee had established mature financial planning, budgeting and reporting processes. CAPEX and OPEX budgets for the GRSF were reviewed and objectives confirmed as completed or indicated to be in process. Financial planning is carried out on life of the assets.</p> <p>Documents/Evidence – 28,79,124,195,236 to 269,</p> <p>Observations:</p> <ul style="list-style-type: none"> Confidential information but performance to date has proved satisfactory. Financial plans were prepared each year and set budgets for future cash flow. Project was underwritten by the sales contract and approved by the Board after close scrutiny Annually Financiers are provided with annual CAPEX and OPEX budgets. Diligent financial reports prepared for the Board on a monthly basis. 		
	<p>Recommendation:</p> <ul style="list-style-type: none"> None 	<p>Action:</p> <ul style="list-style-type: none"> Nil 	

10.2	OBLIGATION: The financial plan identifies the source of funds for capital expenditure and recurrent costs	P&P* Rating: A	Performance Rating: 1
<p>Findings – AMP defines the financial relationships and source of funds. Revenue, O&M costs, CAPEX and disposal costs were well defined in the Financial Modelling.</p> <p>Documents/Evidence –3, 13,14,28,79,109, 124,195,236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> Financial plans and financial reports detail funding sources. Commercial in confidence. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> None 		<p>Action:</p> <ul style="list-style-type: none"> Nil 	
10.3	OBLIGATION: The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	P&P* Rating: A	Performance Rating: 1
<p>Findings – P&L and Balance reported annually and budget forecast for life of assets. . Detailed Financial Modelling has been undertaken by the licensee</p> <p>Documents/Evidence – 15,16,17, 95,196, 236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> Confirmed by Licensee that the financial plan budgeted for life of assets, financial information was commercial in confidence. Annual Financial Reports audited and prepared by independent third party. Audited reports are on unqualified basis. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> None 		<p>Action:</p> <ul style="list-style-type: none"> Nil 	

10.4	OBLIGATION: The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	P&P* Rating: A	Performance Rating: 1
<p>Findings – P&L and Balance reported annually and budget forecast for life of assets. Detailed Financial Modelling has been undertaken by the licensee</p> <p>Documents/Evidence – 95, 236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> • Asset life cycle financial modelling until 2050. Commercial in confidence. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	
10.5	OBLIGATION: The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	P&P* Rating: A	Performance Rating: 1
<p>Findings – Detailed Financial Modelling has been undertaken by the licensee, including all costs associated with operating and maintaining the assets to 2050.</p> <p>Documents/Evidence – 95, 236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> • Comprehensive financial modelling, monitoring and reporting 			
<p>Recommendation:</p> <ul style="list-style-type: none"> • None 		<p>Action:</p> <ul style="list-style-type: none"> • Nil 	

10.6	OBLIGATION: Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	P&P* Rating: A	Performance Rating: 1
<p>Findings – Financials identified variances and comparisons with previous year for GRSF Stage 1. GRSF Stage 2 had the same reporting financial reporting approach, however transitioning from construction to operations.</p> <p>Documents/Evidence –95, 236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> GRSF Stage 2 transitioned from a construction budget financial reporting to operation budget financial reporting basis. 			
<p>Recommendation:</p> <ul style="list-style-type: none"> None 		<p>Action:</p> <ul style="list-style-type: none"> Nil 	

11. CAPITAL EXPENDITURE PLANNING		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Understand the capital expenditure planning process and assess its effectiveness <input type="checkbox"/> Obtain a copy of the capital expenditure plan for the current year and assess whether the process is being followed Key Process – <i>The capital expenditure plan provides a schedule of new works, rehabilitation and replacement works, together with estimated annual expenditure for these works over the next five or more years. Since capital investments tend to be large and lumpy, projections would normally be expected to cover at least 10 years, preferably longer. Projections over the next five years would usually be based on firm estimates.</i> Outcome – <i>The capital expenditure plan provides reliable forward estimates of capital expenditure and asset disposal income. Reasons for the decisions and for the evaluation of alternatives and options are documented.</i>		A	1
No.	2021 AUDIT REPORT EVIDENCE/ VERIFICATION/FINDING/ACTION	P&P* Rating:	Performance Rating:
11.1	<p>OBLIGATION: There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates</p> <p>Findings – Licensee had carried out extensive and diligent financial modelling of assets to its asset life, i.e. 2050.</p> <p>Documents/Evidence – 2,3,11,13,28,79,97,101,109,185,195,236 to 269</p> <p>Observations:</p> <ul style="list-style-type: none"> • GRSF Stage 1 had a nominal end-of-life in 2042. • GRSF Stage 2 had a nominal end-of-life in 2050. • No major CAPEX had been identified during that period but provision had been made for sustaining CAPEX and future upgrade of some equipment. 	A	1

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
11.2	OBLIGATION: The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	P&P* Rating: A	Performance Rating: 1
	Findings – The Financial Modelling detailed the CAPEX priorities and the monthly VMA reports monitored progress and implementation. No further capital spending planned for both stages at the time of the review. Documents/Evidence – 2,3,11,13,28,79,97,101,109,185,195,236 to 269 Observations: <ul style="list-style-type: none"> O&M contractor may propose capital expenditure to ensure performance of the solar farms All CAPEX to be approved by Board. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
11.3	OBLIGATION: The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	P&P* Rating: A	Performance Rating: 1
	Findings – All CAPEX and OPEX was in line with the assets detailed financial modelling to its asset life end date. Documents/Evidence – 2,3,11,13,28,79,97,101,109,185,195,236 to 269 Observations: <ul style="list-style-type: none"> AMPs are reviewed annually and financial model updated accordingly. AMPs and financial budgets approved by Board 		

	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	
11.4	OBLIGATION: There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	P&P* Rating: A	Performance Rating: 1
	Findings – Capital expenditure processes were detailed in the AMP and updated in the year plans and monitored via the monthly reports. Documents/Evidence – 2,3,11,13,28,79,97,101,109,185,195,201 to 235, 236 to 269 Observations: <ul style="list-style-type: none"> The Licensee indicated no further significant CAPEX was anticipated at the time of the review. 		
	Recommendation: <ul style="list-style-type: none"> None 	Action: <ul style="list-style-type: none"> Nil 	

12. REVIEW OF AMS		PROCESS & POLICY RATING*	PERFORMANCE RATING
<input type="checkbox"/> Determine when the asset management plan was last updated and assess whether any substantial changes have occurred <input type="checkbox"/> Determine whether any independent reviews have been performed. If so, review the results and action taken <input type="checkbox"/> Consider the need to update the asset management plan based on the results of this review <input type="checkbox"/> Determine when the asset management system was last reviewed. Key Process – <i>The asset management system is regularly reviewed and updated.</i> Outcome – <i>The asset management system is regularly reviewed and updated.</i>		A	1
No.	2021 AUDIT REPORT EVIDENCE / VERIFICATION/FINDING/ACTION		
12.1	OBLIGATION: A review process is in place to ensure the asset management plan and the asset management system described in it remain current Findings – New project and new AMP prepared. It was noted the AMS was updated and reviewed annually. Documents/Evidence – 1,2,3,10,11,13,121, 185 Observations: <ul style="list-style-type: none"> • O&M Contractor to review its AMP annually and submit to Licensee for approval. • Completed on time and monitored through monthly meetings 	P&P* Rating: A	Performance Rating: 1
	Recommendation: <ul style="list-style-type: none"> • None- 	Action: <ul style="list-style-type: none"> • Nil 	
12.2	OBLIGATION: Independent reviews (e.g. internal audit) are performed of the asset management system Findings – The Licensee had undertaken a full independent internal audit of the AMS. Additionally, the Licensee had reviewed its AMPs and O&M Contractor also reviewed its AMP and submitted to Licensee. Documents/Evidence – 1,2,3,10,11,13,121,185 Observations:	P&P* Rating: A	Performance Rating: 1

	<ul style="list-style-type: none">• The Licensee and the O&M contractor have carried out internal reviews of the AMS and AMP with improvement opportunities identified.• The opportunities identified is aimed at improving the AMS process and is not adversely significant to safety and performance of the assets.		
	<table border="1"><tr><td>Recommendation:<ul style="list-style-type: none">• None</td><td>Action:<ul style="list-style-type: none">• Nil</td></tr></table>	Recommendation: <ul style="list-style-type: none">• None	Action: <ul style="list-style-type: none">• Nil
Recommendation: <ul style="list-style-type: none">• None	Action: <ul style="list-style-type: none">• Nil		

APPENDIX 3 – AUDIT PLAN ASSET REVIEW PRIORITIES

TABLE 16 Effectiveness Criteria Pre-Audit Review

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
1	ASSET PLANNING					0	0	0	5	3	0
1.1	Asset management plan covers the processes in this table	Unlikely	Minor	Low	Strong					5	
1.2	Planning processes and objectives reflect the needs of all stakeholders and are integrated with business planning	Moderate	Probable	Medium	Strong				4		
1.3	Service levels are defined in the asset management plan	Unlikely	Minor	Low	Strong					5	
1.4	Non-asset options (e.g. demand management) are considered	Minor	Unlikely	Low	Strong					5	
1.5	Lifecycle costs of owning and operating assets are assessed	Moderate	Probable	Medium	Moderate				4		
1.6	Funding options are evaluated	Moderate	Probable	Medium	Moderate				4		
1.7	Costs are justified and cost drivers identified	Moderate	Probable	Medium	Moderate				4		
1.8	Likelihood and consequences of asset failure are predicted	Moderate	Probable	Medium	Moderate				4		
1.9	Asset management plan is regularly reviewed and updated	Minor	Unlikely	Low	Strong					5	

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
2	ASSET CREATION AND ACQUISITION					0	0	0	5	0	0
2.1	Full project evaluations are undertaken for new assets, including comparative assessment of non-asset options	Moderate	Unlikely	Medium	Strong				4		
2.2	Evaluations include all life-cycle costs	Moderate	Unlikely	Medium	Strong				4		
2.3	Projects reflect sound engineering and business decisions	Moderate	Unlikely	Medium	Strong				4		
2.4	Commissioning tests are documented and completed	Moderate	Unlikely	Medium	Strong				4		
2.5	Ongoing legal / environmental / safety obligations of the asset owner are assigned and understood	Moderate	Unlikely	Medium	Strong				4		
3	ASSET DISPOSAL					0	0	0	2	2	0
3.1	Under-utilised and under-performing assets are identified as part of a regular systematic review process	Minor	Unlikely	Low	Strong					5	
3.2	The reasons for under-utilisation or poor performance are critically examined and corrective action or disposal undertaken	Moderate	Unlikely	Medium	Strong				4		
3.3	Disposal alternatives are evaluated	Minor	Unlikely	Low	Strong					5	
3.4	There is a replacement strategy for assets	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
4	ENVIRONMENTAL ANALYSIS					0	0	0	4	0	0
4.1	Opportunities and threats in the asset management system environment are assessed	Moderate	Unlikely	Medium	Strong				4		
4.2	Performance standards (availability of service, capacity, continuity, emergency response, etc.) are measured and achieved	Moderate	Probable	Medium	Moderate				4		
4.3	Compliance with statutory and regulatory requirements	Moderate	Unlikely	Medium	Strong				4		
4.4	Service standard (customer service levels etc) are measured and achieved.	Moderate	Unlikely	Medium	Strong				4		
5	ASSET OPERATIONS					0	0	0	6	0	0
5.1	Operational policies and procedures are documented and linked to service levels required	Moderate	Unlikely	Medium	Strong				4		
5.2	Risk management is applied to prioritise operations tasks	Moderate	Unlikely	Medium	Strong				4		
5.3	Assets are documented in an asset register including asset type, location, material, plans of components, and an assessment of assets' physical/structural condition	Moderate	Unlikely	Medium	Strong				4		
5.4	Accounting data is documented for assets	Moderate	Unlikely	Medium	Moderate				4		
5.5	Operational costs are measured and monitored	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
5.6	Staff resources are adequate and staff receive training commensurate with their responsibilities.	Moderate	Unlikely	Medium	Strong				4		
6	ASSET MAINTENANCE					0	0	0	6	0	0
6.1	Maintenance policies and procedures are documented and linked to service levels required	Moderate	Unlikely	Medium	Strong				4		
6.2	Regular inspections are undertaken of asset performance and condition	Moderate	Unlikely	Medium	Strong				4		
6.3	Maintenance plans (emergency, corrective and preventative) are documented and completed on schedule	Moderate	Probable	Medium	Moderate				4		
6.4	Failures are analysed and operational/maintenance plans adjusted where necessary	Moderate	Unlikely	Medium	Moderate				4		
6.5	Risk management is applied to prioritise maintenance tasks	Moderate	Unlikely	Medium	Moderate				4		
6.6	Maintenance costs are measured and monitored	Moderate	Unlikely	Medium	Strong				4		
7	ASSET MANAGEMENT INFORMATION SYSTEM					0	0	0	8	0	0
7.1	Adequate system documentation for users and IT operators	Moderate	Unlikely	Medium	Strong				4		

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
7.2	Input controls include suitable verification and validation of data entered into the system	Moderate	Unlikely	Medium	Moderate				4		
7.3	Security access controls appear adequate, such as passwords	Moderate	Unlikely	Medium	Moderate				4		
7.4	Physical security access controls appear adequate	Moderate	Unlikely	Medium	Moderate				4		
7.5	Data backup procedures appear adequate and backups are tested	Moderate	Unlikely	Medium	Moderate				4		
7.6	Computations for licensee performance reporting are accurate	Moderate	Probable	Medium	Moderate				4		
7.7	Management reports appear adequate for the licensee to monitor licence obligations	Moderate	Probable	Medium	Moderate				4		
7.8	Adequate measures to protect asset management data from unauthorised access or theft by persons outside the organisation	Moderate	Unlikely	Medium	Moderate				4		
8	RISK MANAGEMENT					0	0	0	3	0	0
8.1	Risk management policies and procedures exist and are applied to minimise internal and external risks	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
8.2	Risks are documented in a risk register and treatment plans are implemented and monitored	Moderate	Unlikely	Medium	Moderate				4		
8.3	Probability and consequences of asset failure are regularly assessed	Moderate	Probable	Medium	Moderate				4		
9	CONTINGENCY PLANNING					0	0	0	1	0	0
9.1	Contingency plans are documented, understood and tested to confirm their operability and to cover higher risks	Moderate	Probable	Medium	Moderate				4		
10	FINANCIAL PLANNING					0	0	0	6	0	0
10.1	The financial plan states the financial objectives and identifies strategies and actions to achieve those	Moderate	Unlikely	Medium	Moderate				4		
10.2	The financial plan identifies the source of funds for capital expenditure and recurrent costs	Moderate	Unlikely	Medium	Moderate				4		
10.3	The financial plan provides projections of operating statements (profit and loss) and statement of financial position (balance sheets)	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
10.4	The financial plan provides firm predictions on income for the next five years and reasonable predictions beyond this period	Moderate	Unlikely	Medium	Moderate				4		
10.5	The financial plan provides for the operations and maintenance, administration and capital expenditure requirements of the services	Moderate	Unlikely	Medium	Moderate				4		
10.6	Large variances in actual/budget income and expenses are identified and corrective action taken where necessary	Moderate	Unlikely	Medium	Moderate				4		
11	CAPITAL EXPENDITURE PLANNING					0	0	0	3	1	0
11.1	There is a capital expenditure plan covering works to be undertaken, actions proposed, responsibilities and dates	Moderate	Unlikely	Medium	Moderate				4		
11.2	The capital expenditure plan provides reasons for capital expenditure and timing of expenditure	Moderate	Unlikely	Medium	Moderate				4		
11.3	The capital expenditure plan is consistent with the asset life and condition identified in the asset management plan	Moderate	Unlikely	Medium	Moderate				4		

Ref	Asset Management System Component	Consequence	Risk Likelihood	Inherent Risk	Adequacy of existing controls	Review Priority					
						1	2	3	4	5	N/A
11.4	There is an adequate process to ensure the capital expenditure plan is regularly updated and implemented	Minor	Unlikely	Low	Moderate					5	
12	REVIEW OF AMS					0	0	0	2	0	0
12.1	A review process is in place to ensure the asset management plan and the asset management system described in it remain current	Moderate	Probable	Medium	Strong				4		
12.2	Independent reviews (e.g. internal audit) are performed of the asset management system	Moderate	Unlikely	Medium	Strong				4		
						0	0	0	51	6	0

APPENDIX 4 – AUDIT & REVIEW DOCUMENT LISTING

Documents Reviewed

TABLE 17 Documents Reviewed and Assessment of Effectiveness

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT	
															Current, Reviewed, implementation verified
															Requires some review, implementation not fully verified
Requires review, document obsolete or not implemented															
1	GRE-MAN-ASM-0001-BEI GRSF Asset Management System (Rev 1) 8Jul21(002)														
2	FS Greenough Maintenance Asset management Plan 1.0 (See Number: 185)														
3	GRE-PLN-ASM-0001-GRSF AMP-signed														
4	BEI Operational Schematic														
5	Electricity Generation License 27 (EGL27)														
6	GRSF Trust ABN Report														
7	Schematic of the contracts supporting a BEI Facility														
8	SRV-GSRF-ASIC Company Report 28Jul21														
9	Structure Diagram of the BEI Group														
10	BEI GRSF Asset Management System														
11	First Solar GRSF AMP														
12	FS Org Structure Confirmation														
13	SynergyRed GRSF AMP														
14	SynergyRED Org Structure – 2021-06-30														
15	GRSF Audited Financial Statements FY2018 (Audited)														
16	GRSF Audited Financial Statements FY2019 (Audited)														
17	GRSF Audited Financial Statements FY2020 (Audited)														
18	FS GRSF Annual Maintenance Schedule														
19	FS GRSF Emergency Response Plan														
20	FS GRSF Environment Compliance Plan														
21	FS GRSF Health and Safety Plan														
22	FS GRSF Information Management Plan														
23	FS GRSF Site Risk Register														
24	FS GRSF Spill Prevention and Response Plan														
25	FS GRSF Stage 1 SOP														
26	FS GRSF Stage 2 SOP														
27	Asset Management Agreement with SynergyRED (Redacted)														
28	BEI Business Plan FY2122 (redacted for GRSF)														
29	BEI Policy manual – 24 Mar21														
30	BEI WHS system – Ver D -3 Sep18														

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT
31	Development Agreement													
32	GRSF Outage Management Procedure													
33	GRSF Stage 1 PPA with WaterCorp (heavily redacted)													
34	GRSF Stage 2 PPA with Synergy (heavily redacted)													
35	Investors Agreement (Redacted except for TOC)													
36	O&M agreement – stage 1 (Some redacted schedules)													
37	O&M agreement – stage 2 (Some redacted schedules)													
38	Vehicle Management Agreement (Some redacted schedules)													
39	7 2018-08-06-RPT-SynergyRED – AMA Operational report GRSF Jul 18													
40	8 2018-09-13-RPT-SynergyRED-AMA Operational Report GRSF Aug 18 9final, complete data)													
41	9 2018-10-05-RPT- Synergy RED -Monthly Operational Report GRSF Sept 18													
42	10 2018-11-07-RPT-SynergyRED – AMA Operational Report GRSF)ct 18													
43	11 2018-12-07-RPT-SynergyRED-AMA-Monthly Operations Report GRSF Nov 18													
44	12 2019-01-08-RPT-SynergyRED – Dec 2018 – Monthly Operations Report – Rev 1 - Final													
45	01-2019-GRSF1 – January 2019 AMA report – issued 2019-02-07													
46	02-2019-GRSF1 – Feb 2019 AMA report – issued 2019-03-08													
47	03-2019-GRSF1 – March 19 Monthly Operations report – Final – received 2019-04-05													
48	04-2019-GRSF1-April 19 – Monthly Operations Report – Submit – 2019-05-07													
49	05-2019-GRSF1-May 19 – Monthly Operations Report – Final – issued 2019-06-10													
50	06-2019-GRSF1-June 19- AMA Monthly Operations Report 2019-07-05													
51	07 BEI – GRSF1 – July 19- Monthly Operations Report - Final													
52	08 BEI – GRSF1 – August 19- Monthly Operations Report - Final													
53	09 BEI – GRSF1 – September 19- Monthly Operations Report - Final													
54	10 BEI – GRSF1 – October 19- Monthly Operations Report - Final													
55	11 2019- GRSF1 – November 19- Monthly Operations Report													
57	12 AMA GRSF December Monthly Report issued 08-01-2021													
58	11 AMA GRSF November Monthly Report issued 07-12-2020													
67	10 AMA GRSF 1&2 October Monthly Report issued 06-11-2020													
68	9 AMA GRSF 1&2 September Monthly Report issued 07-17-2020(1)													

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT	
															Current, Reviewed, implementation verified
															Requires some review, implementation not fully verified
Requires review, document obsolete or not implemented															
69	8 AMA GRSF 1&2 August Monthly Report issued 07-09-2020 (1)														
70	7 AMA GRSF 1&2 July Monthly Report issued 07-08-2020														
71	6 AMA GRSF 1&2 June Monthly Report issued 07-7-2020														
72	1 AMA GRSF January Monthly Report issued 08-02-2021														
73	2 AMA GRSF February Monthly Report issued 08-03-2021														
74	3 AMA GRSF March Monthly Report issued 09-04-2021														
75	4 AMA GRSF April Monthly Report issued 07-05-2021														
76	5 AMA GRSF May Monthly Report issued 08-06-2021														
77	6 AMA GRSF June Monthly Report issued 08-07-2021														
78	Draft Western Power Operating Protocol for GRSF 21 December 2020 (Awaiting WP) (Refer Number 199)														
79	OPEX&CAPEX Work Planner 2021 Review														
80	BEI Critical dates register 2021														
81	ERA Compliance Reporting Assessment – GSRF Extract-2020 submission														
82	ERA EGL27 Annual License Payment – 22.06.21														
83	SRV – GRSF-047-R-ERA-Compliance Report -EGL27 – 2018-09-19.doc														
84	SRV-GRSF-071-LTR-ERA-Annual Electricity Licence Compliance Reporting Obligations 2018-19SRV GRSF ATF GRSF Trust -Issued-2019-09-27														
93	SRV-GRSF-090-LTR-ERA-Compliance Report Letter FY20-SRV GRSF ATF GRSF Trust – issued 2020-08-26														
94	7 AMA GRSF July Monthly Report Issued 19-08-2021														
95	August 2021 GRSF Monthly Meeting Minutes														
96	BEI Business Continuity Plan														
97	BEI Procurement procedure (Rev 1) 5 Mar 21														
98	BEI Risk Management Procedure (See Number 189)														
99	ERA EGL27 Annual License Payment – 22.06.21														
100	ETAC (Western Power) 2018-04-06														
101	Financial Asset Register – GRSF Trust														
104	Garratt Lease dated 6 April 2018														
105	July 2021 GRSF Monthly Meeting Minutes														
106	Levett Lease dated 6 April 2018														
109	SRV-GRSF-061-LTR-NAB-2022FY Budget – GRSF Finance Co Pty Ltd – 2021-04-30														

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT
111	E5333036-West-Casuarinas-Nangettywalkaway_roads-west_Casuarinas													
112	GRSF2 PC certificate signed 09-Oct-2020													
113	Transmission generator IATP Certificate – GRSF v5													
114	2012.07.04 City of Geraldton revised Planning Approval													
115	Geraldton City Council confirmation of no further approval required													
116	GRSF Approved Plans by CGM and SOM													
117	ERA Letter Ref: D227366 - 6 April 2021 - Commencement of 2021 performance audit and asset management system review													
118	ERA Letter Ref: D234763 - 29 June 2021 - Approval of auditor – 2021 performance audit and asset management system review													
119	Delivery of 2021 GRSF ERA Compliance Report to the ERA EGL – 27 -25 Aug21													
120	ERA Confirmation of Receipt of GRSF 2021 Compliance Report (EGL27) 27 Aug 21													
121	GRSF EGL27 Synergy Internal Review Report													
122	GRSF Extract – FY21 Reporting Year – Electricity Compliance Reporting Manual													
123	SRV – GRSF-091-LTR-ERA-Compliance Report Letter FY21 – SRV GRST ATF GRSF Trust – issued – 2021-08-25													
124	Post Site Audit document request – GRSF EGL27 Audit and Review – 15 Sept 2021													
125	BEI – Cyber Security Training													
135	BEI cyber security clauses (002)													
146	BEI Cyber Security refresher Dec 2020													
150	BEI email to First Solar re Cyber Clauses add to O&M Agreements 18 Aug 21													
151	BEI Privacy Policy Refresher Briefing Dec 2020													
161	First Solar – OM Cyber Security Questionnaire – CS Response													
162	VER1-2021-04-01 to 2021-05-01-Standard report													
163	VER1-2021-05-01 to 2021-06-01-Standard Report													
164	VER1 – 2021-06-01 to 2021-07-01 Standard Report													
165	682004.FRM006-MDevries													
166	682004.FRM006-NDevries													
167	Australian Team-Training Status													
168	E learning													
169	Learning_Profile_Mitch													
170	FW_VER1 PPM Weekly Call – 03-May -21													

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT
171	FW_VER1 PPM Weekly Call – 04-Jun -21													
172	FW_VER1 PPM Weekly Call – 15-Mar-21													
173	191110_Greenough_River_Annual_Maintenance Schedule													
174	191210_Greenough_River_Annual_Maintenance Schedule													
175	2000619_Greenough_River_Annual_Maintenance Schedule													
176	200722_Greenough_River_Annual_Maintenance Schedule													
177	210421_Greenough_River_Annual_Maintenance Schedule													
178	20210609 Audit Summary GRS Farm													
179	20210609 HASP Audit Report GRS Farm													
180	BEIFirstSolarAuditValidation_Aug20_FINAL 16092020_NGComment_201218													
181	Empower_GRSF_Top_10_Risks_with Aggregarte_consequence_pie_chart_controls_rating_levels													
182	SynergyRED_Risks_Summary_Bowtie_View_Terminarion of AMA's and VMA													
183	681002.1-OMRiskRegisterRev1.6													
184	682001-HASP.AUS													
185	FS Greenough Maintenance Asset Management Plan 1.1													
186	FS MOC form													
187	FS Pre-Job Brief Form													
188	170708_AUME-R-02-U.20180329(FINAL) GRSF1 and GRSF2 Tech DD Report – Redacted													
189	BEI Risk management Procedure (Rev A)													
190	EGL27-Standing Charges Units Report 2021-SRV GRSF Pty Ltd as Trustee for the GRSF Trust 2021-09-13													
191	ERA Confirming of Standing Charges Notification14 Sep 21													
192	GRE-CRS-ELC-0000-Minor Plant Modification Form Template													
193	GRE-CRS-ELC-0000-Minor Plant Modification Form – Frequency PQ and MW changes													
194	GRE-CRS-ELC-0000-Minor GRSF 240V UPS Replacement													
195	Greenough River Solar Farm – Financial Model – for EGL Audit- redacted													
196	GRSF – Annual Audited Financial Statements - 2021													
197	GRSF Spares													
198	JUWI GRSF2 – Punchlist Master updated 14-09-21													
199	NOP 010 Greenough River Solar Farm (MGA) Rev 18 final draft (005)													
200	Email future development Review													

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT	
															Current, Reviewed, implementation verified
															Requires some review, implementation not fully verified
	Requires review, document obsolete or not implemented														
201	2018.5 board Minutes – October 2018_Redacted														
202	2018.6 board Minutes – November 2018_Redacted														
203	2018.7 board Minutes – November 2018_Redacted														
204	2018.8 board Minutes – November 2018_Redacted														
205	2019.1 Board Minutes – January 2019_Redacted														
206	2019.2 Board Minutes – February 2019_Redacted														
207	2019.3 Board Minutes – March 2019_Redacted														
208	2019.4 Board Minutes – April 2019_Redacted														
209	2019.5 Board Minutes – May 2019_Redacted														
210	2019.6 Board Minutes – June 2019_Redacted														
211	2019.7 Board Minutes – July 2019_Redacted														
212	2019.8 Board Minutes – August 2019_Redacted														
213	2019.9 Board Minutes – September 2019_Redacted														
214	2019.10 Board Minutes – October 2019_Redacted														
215	2019.11 Board Minutes – November 2019_Redacted														
216	2020.1 Board Minutes – January 2020_Redacted														
217	2020.2 Board Minutes – March 2020_Redacted														
218	2020.3 Board Minutes – April 2020_Redacted														
219	2020.4 Board Minutes – April 2020_Redacted														
220	2020.6 Board Minutes – June 2020_Redacted														
221	2020.7 Board Minutes – July 2020_Redacted														
222	2020.8 Board Minutes – August 2020_Redacted														
223	2020.9 Board Minutes – September 2020_Redacted														
224	2020.10 Board Minutes – September 2020_Redacted														
225	2020.11 Board Minutes – October 2020_Redacted														
226	2020.12 Board Minutes – October 2020_Redacted														
227	2020.13 Board Minutes – November 2020_Redacted														
228	2020.14 Board Minutes – December 2020_Redacted														
229	2021.1 Board Minutes – February 2021_Redacted														
230	2021.2 Board Minutes – February 2021_Redacted														
231	2021.3 Board Minutes – March 2021_Redacted														
232	2021.4 Board Minutes – April 2021_Redacted														

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT
233	2021.5 Board Minutes – May 2021_Redacted													
234	2021.6 Board Minutes – July 2021_Redacted													
235	2021.7 Board Minutes – August 2021_Redacted													
236	2018-09-BEI-Vehivle Management VMA Report - Redacted													
237	2018-10-BEI-Vehivle Management VMA Report - Redacted													
238	2018-11-BEI-Vehivle Management VMA Report - Redacted													
239	2018-12-BEI-Vehivle Management VMA Report - Redacted													
240	2019-01-BEI-Vehivle Management VMA Report - Redacted													
241	2019-02-BEI-Vehivle Management VMA Report - Redacted													
242	2019-03-BEI-Vehivle Management VMA Report - Redacted													
243	2019-04-BEI-Vehivle Management VMA Report - Redacted													
244	2019-05-BEI-Vehivle Management VMA Report - Redacted													
245	2019-06-BEI-Vehivle Management VMA Report - Redacted													
246	2019-07-BEI-Vehivle Management VMA Report - Redacted													
247	2019-08-BEI-Vehivle Management VMA Report – August 2019 Redacted													
248	2019-09-BEI-Vehivle Management VMA Report – September 2019 Redacted													
249	2019-10-BEI-Vehivle Management VMA Report – October 2019 Redacted													
250	2019-12-BEI-Vehivle Management VMA Report – December 2019 Redacted													
251	2020-01-BEI-Vehivle Management VMA Report – Jan 2020 Redacted													
252	2020-02-BEI-Vehivle Management VMA Report – Feb 2020 Redacted													
253	2020-03-BEI-Vehivle Management VMA Report – Mar 2020 Redacted													
254	2020-04-BEI-Vehivle Management VMA Report – Apr 2020 Redacted													
255	2020-05-BEI-Vehivle Management VMA Report – May 2020 Redacted													
256	2020-06-BEI-Vehivle Management VMA Report – June 2020 Redacted													
257	2020-07-BEI-Vehivle Management VMA Report – July 2020 Redacted													
258	2020-08-BEI-Vehivle Management VMA Report – August 2020 Redacted													
259	2020-09-BEI-Vehivle Management VMA Report – September 2020 Redacted													
260	2020-10-BEI-Vehivle Management VMA Report – October 2020 Redacted													
261	2020-11-BEI-Vehivle Management VMA Report – November 2020 Redacted													

NUMBER	DOCUMENT ASSESSMENT	ASSET PLANNING	ASSET CREATION & ACQUISITION	ASSET DISPOSAL	ENVIRONMENTAL ANALYSIS	ASSET OPERATIONS	ASSET MAINTENANCE	A M INFORMATION SYSTEM	RISK MANAGEMENT	CONTINGENCY PLANNING	FINANCIAL PLANNING	CAPITAL EXPENDITURE PLANNING	REVIEW OF AMS	PERFORMANCE AUDIT	
															Current, Reviewed, implementation verified
															Requires some review, implementation not fully verified
															Requires review, document obsolete or not implemented
262	2020-12-BEI-Vehivle Management VMA Report – December 2020 Redacted														
263	2021-01-BEI-Vehivle Management VMA Report – January 2021 Redacted														
264	2021-02-BEI-Vehivle Management VMA Report – February 2021 Redacted														
265	2021-03-BEI-Vehivle Management VMA Report – March 2021 Redacted														
266	2021-04-BEI-Vehivle Management VMA Report – April 2021 Redacted														
267	2021-05-BEI-Vehivle Management VMA Report – May 2021 Redacted														
268	2021-06-BEI-Vehivle Management VMA Report – June 2021 Redacted														
269	2021-07-BEI-Vehivle Management VMA Report – July 2021 Redacted														
270	Wholesale-Electricity-Market-Rules-1-October-2021.pdf														
271	RFP - GRSF Audit (Final).pdf														
272	Notice - Decision to approve transfer of Generation licence EGL027 from Greenough River Solar Farm Pty Ltd to SRV GRSF Pty Ltd														
273	Decision - Transfer of EGL27 from Greenough River Solar Farm Pty Ltd to SRV GRSF Pty Ltd														
274	EGL27 - Licence transfer application.PDF														
275	EGL27 - SRV GRSF Notification of change in circumstances														
276	Licence Application Guidelines - Electricity, Gas and Water Licences														
277	ERA Confirmation of Standing Charges Notification 14Sep21														
278	2020 Licence Standing Charge Data for SRV GRSF Pty Ltd (EGL27) and BEI WWF Pty Ltd (EGL29)														