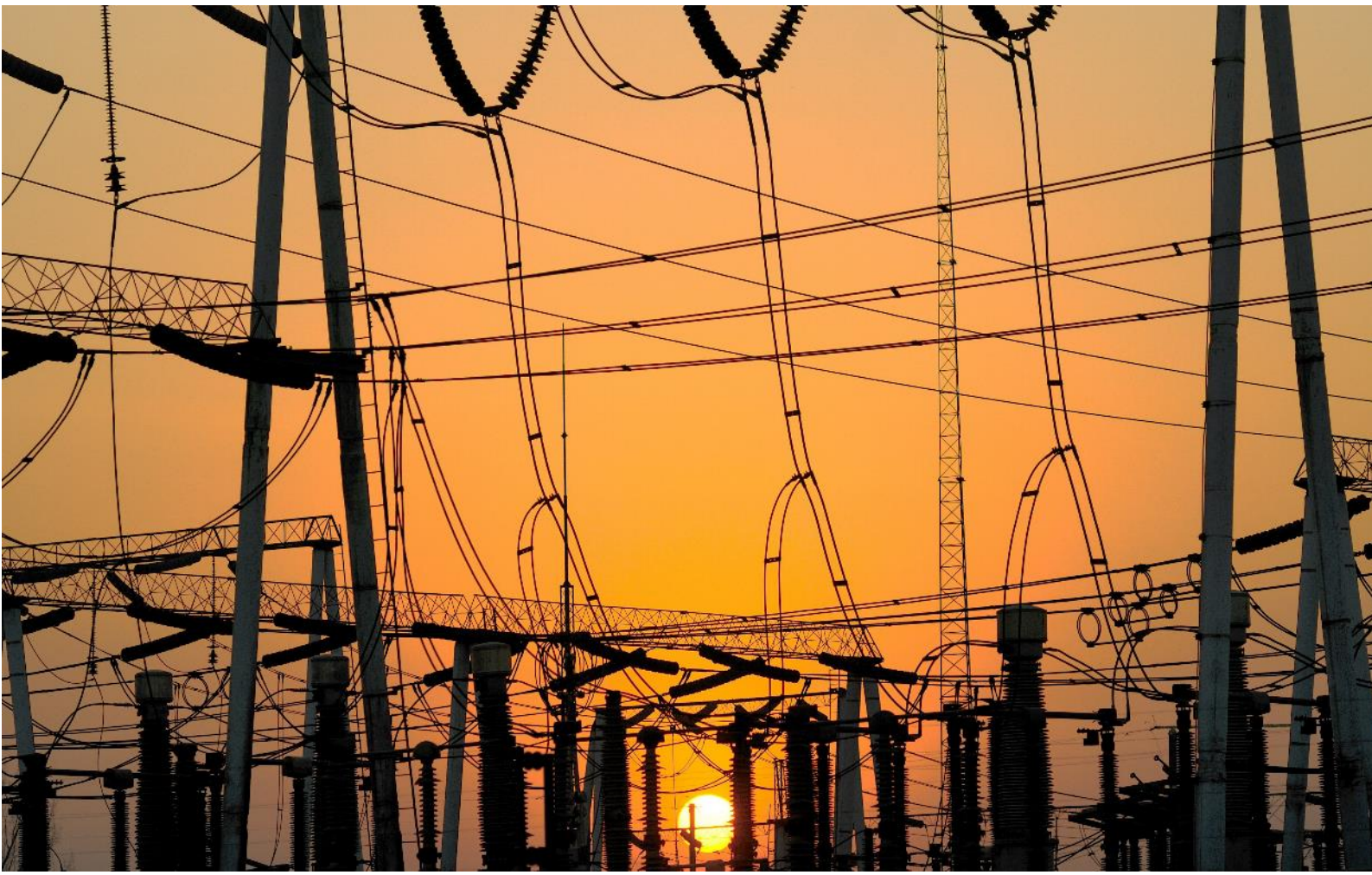
Electricity Networks Corporation trading as Western Power

Electricity Distribution (EDL1) and Transmission (ETL2) Licences

2023 Performance Audit

Final Report

November 2023



CutlerMerz

westernpower

Ms Kei Sukmadjaja
Regulatory Compliance Manager
Regulation and Investment Assurance
Western Power
363 Wellington Street
Perth WA 6000

10 November 2023

Dear Kei,

Re: 2020-2023 Electricity Distribution (EDL1) and Transmission (ETL2) Licence – Performance audit report

I am pleased to provide our Independent Audit Report resulting from the performance audit of Western Power's EDL1 and ETL2 licences for the period 1 July 2020 to 30 June 2023.

I confirm my approval of the content of the report, and that it is an accurate presentation of the audit findings and CutlerMerz' opinions.

Sincerely,

Ryan Dudley
Principal
Email: ryan.dudley@cutlermerz.com

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Executive Summary

The Economic Regulation Authority (ERA) has issued Electricity Networks Corporation T/A Western Power (Western Power) the Electricity Distribution (EDL1) and Transmission (ETL2) Licence (the Licences).

Section 13 of the Electricity Industry Act 2004 (Electricity Act) requires Western Power to provide the ERA with a performance audit (the audit) conducted by an independent expert acceptable to the ERA not less than once in every 24-month period (or any longer period that the ERA allows). The ERA set the period to be covered by the audit as 1 July 2020 to 30 June 2023.

CutlerMerz (we) have undertaken a reasonable assurance audit of Western Power's compliance with its Licence obligations. This report represents the findings and conclusions in relation to both performance audits (i.e., for the EDL1 and ETL2 Licences), reflecting Western Power's obligations as the network operator of its transmission and distribution networks. The report highlights any instances where the obligation relates to only one of the Licences.

Western Power has been granted its licences to maintain, operate and expand activities throughout the Southwest Interconnected System (SWIS). Western Power is the main licensed distributor and transmitter in the SWIS.

The audit has been conducted in accordance with the ERA's 2019 Audit and Review Guidelines: Electricity and Gas Licences (revised August 2022).

SUMMARY OF THE ACTIONS TAKEN BY THE LICENSEE IN RESPONSE TO THE RECOMMENDATIONS IN THE PREVIOUS AUDIT REPORT

The previous performance audit of Western Power's EDL1 and ETL2 licences for the period 1 July 2017 to 30 June 2020, performed by Assurance Advisory Group Pty Ltd, resulted in the auditor making two recommendations for Western Power: Western Power has taken positive steps to address both non-compliances.

The first of these was to finalise the replacement of Western Power's remaining non-compliant direct-connect meters. The second was related to the completion of Power Quality Investigations within a specified timeframe (20 days). Western Power implemented a new report from its Cognos system and minor improvements to its system in which the Power Quality Investigation jobs are managed and tracked. Both measures were implemented to improve the tracking and monitoring of timeframes and non-compliances.

More detail on the recommendations from the previous audit and Western Power's response can be found under Recommendations from Previous Audits.

OUR OPINION ON WESTERN POWER'S CONTROL ENVIRONMENT

In assessing Western Power's control environment, procedures and processes, and compliance attitude, we observed that Western Power has:

- A strong compliance culture throughout the organisation, with staff understanding their obligations and being encouraged to report non-compliances and eagerness to demonstrate how compliance has been achieved.
- An Obligations Register that captures key details of all Licence obligations, including assigned obligation owners and contacts throughout the business.

- Strong internal compliance monitoring and reporting processes that enable Western Power to proactively identify and self-report non-compliances in a timely manner.
- Visible compliance support roles assigned to staff throughout the business, particularly to assist operational teams in monitoring and improving their compliance performance, with regular meetings to identify compliance issues.
- Technological process enhancements to assist in improving compliance through use of automated systems that provide alerts for compliance requirements and validating information.
- A strong working relationship with retailers to identify risks and improvement opportunities through regular contact to identify current and emerging issues.

SUMMARY OF FINDINGS, RECOMMENDATIONS, AND OVERALL ASSESSMENT OF COMPLIANCE WITH THE LICENCES

It is CutlerMerz' opinion that Western Power has materially complied with its Licences and Licence obligations over the audit period, with the exception of a Type 1 non-compliance and one relating to the timeframes associated with the obligation to connect, both of which are discussed below. Western Power had additional non-compliances, however, none of these are in CutlerMerz' opinion, material.

Western Power has demonstrated a strong commitment to improve its controls to combat non-compliances, particularly but not only with respect to its Type 1 obligations, relating to disconnections, restoration priority, and life support equipment addresses. Western Power has experienced one Type 1 breach during the audit period, obligation 297E, relating to the manual updating of email addresses. In this instance, none of the nine customers were adversely affected. Western Power identified and remediated the non-compliance prior to the commencement of the audit and has implemented an interim solution to automatically extract the customer's email address from the retailer's notification and add it to its LSE register.

Western Power intends to implement a permanent solution that involves changing its systems for managing this information. This will require the agreement of retailers.

All but three of the non-compliances observed in this audit were identified by Western Power and were reported to the ERA in its Annual Compliance Reports. Of those that were not identified, only one, obligation 75, is of any notable concern, being related to the timeframes associated with the obligation to connect. Others were non-compliances related to minor instances of omitted information in Western Power's stand-alone power systems engagement strategy and the failure to maintain a facsimile number, but in both cases, it is our opinion that Western Power had operated in the spirit of both obligations. None of these three are Type 1 obligations.

All but five of the obligations not complied with were also not complied with in the prior audit period, but in all cases Western Power has taken meaningful steps to mitigate non-compliance where practicable. Two obligations not complied with have been introduced during the audit period, but one of these is in effect, the same obligation as one that was removed during the audit period. Western Power showed an improvement in compliance performance within the audit period, recording lower or no compliance breaches in FY2023, following some non-compliance earlier in FY2021 and FY2022.

All obligations that were flagged by the ERA for repeated non-compliance, which were given priority attention during the audit, were found to be not complied with over the audit period, but in all circumstances as mentioned above, Western Power took meaningful steps where practicable to improve its compliance performance and reduced the rate of non-compliances in the majority. These are shown in Table 1 below.

Table 1: Areas of Special Focus

Area	2023 Manual[1]
Code of Conduct for the Supply of Electricity to Small Use Customers	Clause 8.2 - 2018 Code (clause 54(1) of 2022 Code) Obligation 244
Metering Code	Clause 5.4(1) / Obligation 386 Clause 5.6(1) / Obligation 391 Clause 5.12(1) / Obligation 397 Clause 5.17A(3) / Obligation 404 Clause 5.25 / Obligation 434 Clause 7.5 / Obligation 455
Network Quality and Reliability of Supply Code	Clause 18 / Obligation 472 Clause 19 / Obligation 473

Table 2: Findings by Rating below presents a summary of findings by compliance rating and controls rating for all obligations assessed in the audit. Compliance and controls ratings are derived in accordance with the ERA's 2019 Audit and Review Guidelines shown in Table 3: Rating Criteria.

Table 2: Findings by Rating

		Compliance Rating					
		1	2	3	4	N/R	Total
Controls Rating	A	237	16			5	258
	B	3	13				16
	C						0
	D						0
	N/P					32	32
	Total	240	29	0	0	37	**306**

[1] Two versions of the manual have been published in 2023 (January and March). Please refer to the latest manual, which was published in March.

Table 3: Rating Criteria

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 effect on customers or third parties
C	Inadequate controls – significant improvement required	3	Non-compliant – moderate effect on customers or third parties
D	No controls evident	4	Non-compliant – major effect on customers or third parties
N/P	Not performed – A controls rating was not required	N/R	Not rated – No activity took place during the audit period

1 Introduction

Western Power, a licensee in the electricity industry, holds two operating licences issued by the ERA in accordance with the Electricity Industry Act 2004 (WA). These licences include the Electricity Distribution Licence (EDL1) and the Electricity Transmission Licence (ETL2). As per the *Electricity Industry Act 2004 (WA)*, licensees are obligated to undergo a performance audit conducted by an independent expert approved by the ERA.

The performance audit is conducted to evaluate and assess the licensee's compliance with the conditions outlined in their licences. The ERA has provided guidelines for conducting such audits, which are outlined in the 2019 Audit and Review Guidelines: Electricity and Gas Licences (Audit Guidelines) available on their website.

CutlerMerz has been nominated by Western Power and this nomination has been approved by the ERA, to carry out a performance audit of Western Power's compliance with the conditions specified in their Electricity Distribution (EDL1) and Transmission (ETL2) licences. The audit covers the period from 1 July 2020 to 30 June 2023.

This audit report, prepared by CutlerMerz, presents the findings and conclusions of the performance audits conducted for both licences, and the final audit report will be provided to the ERA by Western Power. The primary objective of the performance audit is to assess the effectiveness of the measures implemented by Western Power to meet the conditions specified in their licences.

2 Audit objectives and methodology

The primary objective of the audit is to thoroughly assess Western Power's compliance with the requirements outlined in Electricity Distribution (EDL1) and Transmission (ETL2) Licences. This is achieved through a comprehensive evaluation and testing of key areas such as the control environment, information system, control procedures, compliance attitude, and outcome compliance. The audit identifies any areas of non-compliance and provides recommendations for improvement.

Secondly, the audit objectives include this audit report and that it clearly presents the findings of the assessment. This report provides detailed information on the assessment conducted, highlights any areas of non-compliance or under-performance, and offers recommended actions to address these issues. This audit report is intended to serve as a valuable tool for Western Power and the ERA to enhance compliance and ensure the effective operation of the organisation.

To achieve the above objectives a comprehensive audit was carried out by evaluating and testing of the following key areas:

i. Control Environment:
   - Evaluate Western Power's management philosophy and operating style.
   - Assess the organisational structure and the assignment of authority and responsibilities.
   - Review the utilisation of internal audit functions and their effectiveness.
   - Evaluate the use of information technology and its alignment with compliance requirements.
   - Assess the skills and experience of the relevant staff members responsible for compliance.

ii. Information System:
   - Assess the suitability of Western Power's information systems in recording the necessary information to ensure compliance with its licenses.
   - Evaluate the accuracy, reliability, and integrity of the data captured in these systems.
   - Assess the security measures in place to protect sensitive data.
   - Review the documentation that describes the information system to ensure its adequacy and comprehensiveness.

iii. Control Procedures:
   - Evaluate the presence and effectiveness of systems and procedures designed to monitor compliance with the licenses.
   - Assess the ability of these control procedures to detect or prevent instances of non-compliance or under-performance.
   - Review any corrective measures implemented by Western Power in response to previous audit recommendations.

iv. Compliance Attitude:
   - Assess Western Power's actions taken in response to previous audit recommendations.
   - Evaluate the organisation's overall attitude and commitment towards compliance with regulatory requirements including a review of any compliance-related training programs or initiatives.

v. Outcome Compliance:

- Evaluate Western Power's actual performance against the standards prescribed in its licenses throughout the audit period.
- Assess the extent to which the organisation has met compliance targets.
- Identify any areas of non-compliance and analyse their causes.

Additionally, compliance through time over the audit period was assessed against the Electricity Compliance Reporting Manual applicable at that time. There were four Compliance Manuals in effect during the audit period:

- Effective 8 June 2020, published 8 June 2020
- Published 7 February 2022:
    - Effective 5 November 2021 – Electricity Industry Regulations Amendment (Stand-Alone Power Systems) Regulations 2021.
    - Effective 19 August 2021 - Electricity Industry (Metering) Amendment Code 2021.
- Effective 1 January 2023, published 3 January 2023
- Effective 20 February 2023, published 14 March 2023

For applicable licence obligations that were introduced during the audit period, compliance was assessed from the date of introduction. For licence obligations that were amended during the audit period, compliance through time was assessed against the obligation that was applicable at that time.

3 Audit scope

3.1 Audit Period

The period covered under this audit is from 1 July 2020 to 30 June 2023.

3.2 Assurance Engagement

We have conducted this audit in alignment with the Standard on Assurance Engagements (ASAE 3000), which sets forth guidelines for conducting audits effectively. In accordance with the ERA's 2019 Audit and Review Guidelines – Electricity and Gas Licences (August 2022), we applied a level of scrutiny that corresponds to a 'reasonable assurance engagement'.

A reasonable assurance engagement is:

> *An assurance engagement in which the assurance practitioner reduces engagement risk to an acceptably low level in the circumstances of the engagement as the basis for the assurance practitioner's conclusion. The assurance practitioner's conclusion is expressed in a form that conveys the assurance practitioner's opinion on the outcome of the measurement or evaluation of the underlying subject matter against criteria.*

3.3 Compliance Reports and Compliance Registers

Initially, in developing the audit plan, and throughout the audit, an examination of Western Power's compliance reports and compliance register was conducted. The audit team reviewed the compliance reports that were lodged by Western Power to the ERA during the audit period from 1 July 2020 to 30 June 2023. The purpose of this review is to assess the consistency between the compliance reports and the information recorded in Western Power's compliance (breach) register. During the audit, the audit team examined the consistency between Western Power's compliance reports and the entries recorded in the compliance register. We find that the compliance reports are consistent with the compliance register.

3.4 Site Visits

To obtain a representative sample of Western Power's business operations, site visits were conducted as part of the audit. The selection of sites is the responsibility of the audit team. While considering the need for regional and metropolitan coverage, the following sites were visited:

- Northam Depot (regional site)
- Head office (metropolitan site)
- South-Metro Depot (metropolitan site - metering)

The Northam Depot and Head office were identified in the Audit Plan as sites to be visited. In addition, it was determined that site visits to the South-Metro Depot were necessary to complete the audit.

It is important to note that the audit procedures were conducted on-site, and remote procedures were not employed. This approach ensures a comprehensive examination of the control environment, information systems, and compliance procedures.

3.5 Personnel and Documentation

To gain insights into Western Power's compliance practices and assess the effectiveness of their control environment, a series of interviews was conducted with key personnel at each site. Individuals from the teams below were interviewed as part of the audit:

- Access Solutions
- Customer Relations
- Complaints and Resolutions
- Distribution Delivery

- Distribution Grid Strategy
- Field Operations
- Financial Accounting
- Insights and Analytics
- Meter Data Management
- Meter Provision
- Network Control
- Network Operational Systems
- Network Project Delivery
- New Business & Works
- Operational Technology (PQ)
- Regulatory Compliance
- Scheduling & Dispatch
- SPS Delivery
- Technical Operations
- Technology & Data Services
- Customer Service Centre
- Transmission Grid Strategy

These interviews provided valuable information regarding the implementation of compliance measures, the understanding of regulatory requirements, and the overall compliance culture within Western Power.

In addition to interviews, the audit team examined various documentation during the audit process. A list of the documentation examined is provided in Table 11: Information Provided.

3.6 Hours Utilised

The audit was conducted by a team of experienced auditors from CutlerMerz. The team members, their respective roles, and hours spend on the audit is shown in Table 4 below:

Table 4: Team and Hours Utilised

Name	Position	Role	Hours
Tim Edwards	Project Director	Peer Reviewer	42
Ryan Dudley	Practice Leader	Lead Auditor	102.5
Toyosi Craig	Senior Consultant	Auditor	30
Max Hooper	Consultant	Auditor	187
Alexander Myers	Analyst	Auditor	265.5

These auditors bring a diverse range of expertise and skills to ensure a comprehensive and rigorous audit process.

4 Deviations from the Audit Plan

There were no material deviations from the audit plan.

The Northam Depot and Head office were identified in the Audit Plan as sites to be visited. In addition, it was determined that site visits to the South-Metro Depot were necessary to complete the audit. The Audit Plan allows for additional site visits where appropriate, so this is, in effect, not a deviation from the Audit Plan.

In some circumstances, specific key stakeholders interviewed differed from the audit plan where appropriate in cases where there was a more suitable stakeholder to interview than the proposed interviewee. Additionally, the names of some relevant items intended to be examined were different to those initially stated in the proposed audit tests.

5 Recommendations from Previous Audits

As part of the audit process, a review was conducted to assess the recommendations from the previous audit and the subsequent actions taken by Western Power to address them. The previous audit resulted in two recommendations from the auditor. In both cases, Western Power addressed the recommendations and completed the associated action plans within the audit period and no recommendations were left unresolved over the audit period.

The recommendations from the previous audit are shown in Table 5 and Table 6.

Table 5: Previous Audit Recommendations - Resolved

A. Resolved during current audit period				
Recommendation reference	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Date resolved**	**Further action required** **Details of further action required**
1/2020	A2 Obligation 341 - Electricity Industry Metering Code Clause 3.11A(2) Since Western Power first recognised that there were approximately 320,000 non-compliant direct connect meters on its network, it developed an action plan (approved by the EnergySafety division of the Department of Commerce) to replace the non-compliant meters by 1 December 2015. An amendment to the Code confirmed that only approximately 54,000 of the 320,000 meters were non-compliant. Western Power has continued to implement its Management Plan for replacing or removing the remaining meters as soon as practicable, taking into account safety concerns or access constraints. As at 30 June 2023, only one non-compliant meter remained to be replaced. The number of non-compliant meters has reduced in each year of the audit period, from 1,813 non-compliant meters in FY21 and 858 non-compliant meters in FY22. This demonstrates the effectiveness of Western Power's replacement program in reducing compliance with this clause.	Western Power close-out the Management Plan to address the remaining non-compliant meters by determining the likelihood of those meters being replaced or removed, and any relevant timeframe for replacement or removal.	31/10/2021	N/A
2/2020	C2 Obligation 479 - Network Quality & Reliability of Supply Code Section 24(3) Section 24(3) of the NQRS Code requires Western Power to complete power quality investigations within 20 working days for qualifying requests by customers who consider that their supply of electricity did not comply with the voltage fluctuation and harmonic standards specified by the NQRS Code. In accordance with Action Plan 7/2017, Western Power amended its processes for managing and monitoring the completion of its power quality investigations to enable it to adequately distinguish between investigations per the NQRS Code requirements and service standard targets. Since approximately April 2018, Western Power had not effectively applied that component of its power quality investigation process and as a result, failed to identify	Western Power: 1. Further expand on its design of processes for identifying and adequately tracking the progress of written requests for power quality investigations that trigger the NQRS Code's requirement for investigations to be completed within 20 working days. 2. Embed those processes into its regular (monthly, quarterly and/or annual) monitoring and reporting practices. 3. Strengthen awareness of the	31/12/2021	N/A

A. Resolved during current audit period				
Recommendation reference	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Date resolved**	**Further action required** **Details of further action required**
	and adequately track the progress of four written requests for investigation that triggered the NQRS Code's requirement for power quality investigations to be completed within 20 working days. In all four cases, occurring between December 2018 and April 2020, the investigation was not completed within the required timeframe. This result was recognised by Western Power when preparing the requested information for this audit.	relevance of this process and underlying NQRS Code obligations.		

Table 6: Previous Recommendations - Unresolved

B. Unresolved at end of current audit period			
Recommendation reference	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Further action required** **Details of further action required**
N/A			

The actions taken by Western Power to address the recommendations were:

Recommendation 01/2020:

During the prior audit period Western Power had a Management Plan in place to identify and prioritise non-compliant direct-connect meters by determining the likelihood of those meters being replaced or removed, and to replace or remove them. By the end of the prior audit period, Western Power had reduced the non-compliant meters from 1813 to 20. The final 20 meters were replaced, and the Management Plan was closed-out in October 2021.

Recommendation 02/2020:

Western Power took positive actions to address the non-compliance with the obligation to complete power quality investigations within 20 business days, with the action plan completed in December 2021. These included but were not limited to:

- Reviewed the processes used to track power quality investigations and implemented any identified improvement opportunities into the processes, this included providing training and awareness on any improvements and reinforcing communications to ensure the awareness of compliance requirements.
- Reviewed the reporting process to enhance timely reporting of any non-compliances.
- Implemented a daily report from its Cognos system, which is sent to the regional mail group, based on allocated zones, which gives the SLA requirement date for the next seven days and who it is assigned to.
- An updated DQM Power Quality Work Instruction was made available to PQ staff in Metro and Regional areas.

6 Non-Compliances and Recommendations

A summary of non-compliances and our recommendations determined in the audit is presented in the tables below, the Non-Compliances which were resolved during the audit period and with no outstanding actions prescribed are shown in Table 7, and our recommendations are shown in Table 8. All recommendations are associated with obligations that Western Power was found to have not been compliant with.

6.1 Non-Compliances, Resolved During the Audit Period

Table 7: Non-Compliances - Resolved

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
77	A2 Electricity Industry (Obligation to Connect) Regulations, regulation 8 CutlerMerz finds that Western Power has, as disclosed in its Annual Compliance Reports to the ERA, not complied with this obligation in meeting the defined timeframes for performing re-energisations. Given the nature of the non-compliances, we find that if may not be realistic or practicable to maintain 100% compliance, and given this, we find that its controls can be expected to, so far as reasonably practicable, ensure compliance. - Western Power disclosed in its Annual Compliance Report to the ERA that it did not comply with this obligation, reporting that 37 (0.23%) and 42 (0.21%), in FY2021 and FY2022 respectfully, of re-energisations were not completed in the defined timeframe. - The majority of these were due to delays in crews attending energisations as emergency work such as bushfire and storm repairs, and technical issues being identified which requires specialist crews were taking priority. - Western Power has reported in its Annual Compliance Report for FY2023, with non-compliances all due to reasons mentioned above, but at the rate of 26 (0.16%). - In the majority of cases, the defined timeframe was not exceeded by 24 hours. - Once an energisation request is received it is translated into a work order through the DQM, which is referred to the field crew and shows the SLA timeframe. - Affected sites were individually case managed to ensure that they were reconnected as soon as practicable.	We find that Western Power continues to maintain procedures which, so far as reasonably practicable, ensure compliance. It also continues to maintain effective procedures to monitor its compliance with this obligation, including but not limited to a monthly report of re-energisation service orders that are non-compliant or don't reach the SLAs.	No further action required.
124	A2 Distribution Licence, condition 4.5.1 Transmission Licence, condition 4.5.1 CutlerMerz finds that Western Power, as reported in its Annual Compliance Reports, has not complied with this obligation over the audit period. We note that the non-compliance was due to an incorrect interpretation of the Electricity Distribution Licence Performance Reporting Handbook (the Handbook). We acknowledge that it may not be practicable for Western Power to at all times guarantee the correct interpretation of the Handbook, and find that its controls can be expected to, so far as reasonably practicable, ensure compliance. - Western Power reported non compliances in both its FY2021 and FY/2022 Annual Compliance Reports.	Western Power has corrected the calculations that were the cause of incorrect information being submitted to the ERA.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
	- In FY2021 the calculations used by Western Power on Normalised Distribution Network data reported for the 2019/20 financial year excluded the impact of Force Majeure events. - In FY2022 the calculations used by Western Power on Normalised Distribution Network reliability data reported for the 2020/21 financial year excluded the impact of Transmission outage events on consumers. - Neither exclusion is allowable under the Electricity Distribution Licence Performance Reporting Handbook (the Handbook), and the non-compliance was due to an incorrect interpretation of the Handbook. - Western Power has ceased to make these exclusions, in accordance with the Handbook.		
233	A2 Code of Conduct, clause 7.5 CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Reports. We believe that the measures implemented in response to the non-compliance can be expected to, so far as reasonably practicable, ensure ongoing compliance. CutlerMerz makes no further recommendation with respect to this obligation. - Western Power reported a non-compliance in its FY2021 Annual Compliance Report, having been compliant in the previous audit period and in other years during the audit period. - The non-compliance was due to a gateway router fault, which caused the 24-hour emergency line to become unavailable for approximately 30 minutes.	In response to the non-compliance, a backup plan (Kytec Call Mapping) was implemented for when calls cannot be delivered to the standard phone system. The Customer Service Centre team manually implements a bypass to an alternative number (via Kytec), which plays an emergency message directing people to call 000 if they are calling about a life-threatening emergency (LTE). The vXML router responsible for the issues encountered in April 2021 was changed to a monitored service. Should the equipment fail, an automated alert will be raised with Western Power Service desk. The detail is recorded in Service Now. Additional new solutions are being investigated as part of current system upgrades.	No further action required.
301	A2 Code of Conduct, clause 88 CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its FY2022 Annual Compliance Report, but that after the implementation of additional controls, CutlerMerz believes that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - Western Power reported an instance of non-compliance in the 2021/22 Annual Compliance Report, when Western Power did not acknowledge one customer complaint within 10 business days. - Western Power received a customer complaint letter on 9 February 2022 and an acknowledgment letter was not sent out within 10 business days due to an oversight by the complaint officer who miscalculated the date for response. - A customer acknowledgment letter was sent on 24 February 2022 (the 11th day). - The associated response met the 20 business day timeframe. - The number of non-compliance has improved since the prior audit period. In the prior audit period 13 customers were affected.	In response to the non-compliance incident, Customer Relations team members are now provided with a WIP dashboard which is updated on a daily basis, this will reflect any complaints for which the acknowledgement date hasn't been filled in in the CMS system. There is a 'Daily Update' email that is sent around to the team that shows cases that need to be closed and any associated details.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
326	A2 Electricity Industry Metering Code, clause 3.5(1) and (2) CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Reports. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - Non-compliance occurred in 4 instances (1 in FY2021, 2 in FY2022 and 1 in FY2023) over the audit period and related to unusual circumstances where a damaged meter required substituted data, the other non-compliance related to a unit complex with unique circuit setup not allowing sub-metering. - Western Power undertakes 15,000-20,000 connections annually, supported by a robust process under the service apparatus connection scheme and the contractor connection scheme. The connection schemes service installation rules and authorisation with installers is audited to ensure installations are compliant with the Western Australia service installation rules.	Western Power continue to monitor the performance of meters in the field to determine if replacement is required.	No further action required.
336	A2 Electricity Industry Metering Code, clause 3.10 CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - Non-compliance related to inspection of CT meters on 6 sites proactively identified by Western Power. The non-compliance affected 6 customers and 4 retailers in FY2022 and 1 customer and 1 retailer in FY2023. - The metering inspection is carried out to ensure the meter functions in accordance with the revenue meter technical specifications that is consistent with the requirements in the metering code. - Western Power's high voltage current transformers design guidelines outlines Western Power's meter reading accuracy requirements for CT meters, that must be supported by a test certificate to demonstrate meter calibration is traceable to the Australian National Measurement Institute. - The metering technical services team provided a walkthrough of their data visualisation tool that provides a number of automated validation checks on meter reads and metadata that describes the characteristics of each metering installation. This mitigates against future compliance breaches associated with erroneous data being entered into the metering business system database that does not match asset installation details.	In response to the non-compliance, Western Powers continues to monitor meter performance with a data visualisation tool that provides a number of automated validation checks on meter reads and metadata that describes the characteristics of each metering installation. This mitigates against future compliance breaches associated with erroneous data being entered into the metering business system database that does not match asset installation details.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
341 1/2020	A2 Electricity Industry Metering Code, clause 3.11A(2) CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - The non-compliance relates to delays of meter replacements for meters that failed sample testing on 29 March 2018. Inability to access properties, or customers that are unable to be contacted are the main reasons that there are 718 outstanding meter replacements as of 30 June 2022. The number of meters needing to be replaced in each year of the audit period are FY2021 1,813 meters, FY2022 718 meters, FY2023 1 meter. - The metering installation team advised that Western Power proactively prompts customers to replace meters as needed, including site visits and use of Landgate to locate sites and customers. This includes identification of vacant sites that are listed for a meter replacement. The requirement to replace a failed meter is cancelled only after a vacant or derelict site is abolished. - Western Power considers that a number of metering replacements cannot be undertaken due to customer not upgrading circuits, unable to access site due to aggressive customers and potential injury to Western Power staff. Western Power liaises with Police in respect of engaging these customers.	In response to the non-compliance, Western Power continues to use all means to contact customers to organise meter replacements, including site visits, phone calls, emails and the use of Landgate to locate sites and customers.	No further action required.
357	A2 Electricity Industry Metering Code, clause 3.21(1) CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - The non-compliance related to time drift of meter readings due to degraded batteries that caused the meter's internal clock being unable to accurately keep time, as measured over 1 month. The non-compliance in each year measured by the percentage of failure as a proportion of the number of tests performed was FY2021 0.03% of 562,000 meter tests, FY2022 0.79% of 727,984 meter tests, and FY2023 0.46% of 720,998 meters tests. - Monthly reporting of non-compliance due to time drift during the audit period demonstrated effective controls to identify time drift and rectify the non-compliance as necessary. - The Metering Technical Services team identified a number of procedures and validation checks used to detect time drift from data uploaded to the Metering Business System (MBS). This was demonstrated with exception management reports that detail procedures using Western Power's MV90 system to detect time drift. - As per the specification document provided for revenue meters, all AMI meters include an alarm that sounds when the battery power reaches a low-level condition.	In response to the non-compliance, Western Power staff continue to perform validation checks used to detect time drift from data uploaded to the metering business system.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
	- As per Western Power's inspection and acceptance testing procedure, laboratory testing of meters requires calibration and testing of time drift. - Western Power verifies metering vendors' calibration testing to ensure meters maintain time accuracy as prescribed by the Metering Code.		
376	A2 Electricity Industry Metering Code, clause 4.7(1) CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - The non-compliance relates to not publishing 3,585 (FY2022) and 728 (FY2021) standing data sets within the 2 business days after the data being updated, as prescribed by the Metering Code. Western Power was compliant with this obligation in FY2023. - Western Power maintains a full set of standing data with automated detection identifying when data has changed. - The IT issue related to a security configuration within the metering business system that was blocking automated processes. The security configuration that caused the non-compliance has since been rectified. The unplanned outage of the metering business system also caused the delay in providing standing data within the prescribed timeframe in FY20. - Western Power staff have limited access to the metering business system with only read access and few permissions for writing access on the database in order to maintain appropriate security protocols. - Requests for standing data are made via a web portal and sent via a B2B process from the metering business system. This provides for the process to send standing data in response to requests from customers/retailers, as per the Western Australian Electricity Market Build Pack Customer Transfer and Standing Data Procedure.	In response to the non-compliance Western Power staff have identified the security setting blocking automated processes in the metering business system and providing standing data within the prescribed timeframes.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
397	A2 Electricity Industry Metering Code, clause 5.12(1) CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - The non-compliance relates to not providing energy data within 2 business days of the request due to incorrect data configuration within internal systems. The non-compliance affected 0.12% of requests to provide energy data in FY2022 only. - Requests and responses for data follow an automated B2B process are made as per communication protocols in the build pack - Western Power produces a monthly compliance report is produced to monitor requests and responses for data - A walkthrough of the MBS has revealed data security configuration improvements where the security program feature prevented requests being automatically processed on time. The fix to the security configuration may mitigate future compliance breaches of this obligation.	In response to the non-compliance, Western Power has rectified the security configuration blocking automated processes to send and receive energy data.	No further action required.
404	A2 Electricity Industry Metering Code, clause 5.17A(3) CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - Non-compliance relates to energy data not provided within the prescribed timeframe of no later than 10 business days after the direction is received. - Compliance with this obligation improved during FY2023, with only 0.21% of responses to directions were not provided within the prescribed timeframes. This compared to 9.33% in FY2022 and 1.3% in FY2021. - Western Power maintains a process to receive requests via a web portal and other forms of electronic communications. - Non-compliance has been addressed with improvement in ICT security configuration that prevented directions being received by Western Power. This security protection was fixed so future directions would not be blocked as demonstrated by an IT job logged in internal systems. - Western Power metering business system and Energy Data Authorisation System (EDAS) system provides an automated method of delivery of energy data upon direction.	In response to the non-compliance, Western Power has rectified the security configuration blocking automated processes to send and receive energy data.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
434	A2 Electricity Industry Metering Code, clause 5.25 CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - The non-compliance affected 211 customers in FY2021, 213 customers in FY2022 and no breaches in FY2023 with no breaches of this obligation since the manual over-ride issue was identified. - The meter reading management team advised that an inquiry through the Ombudsman raised the issue of actual meter reads incorrectly published as actuals when in fact they were substitution meter reads. The error resulted from an analyst incorrectly manually over-riding a value generated from an automated energy data collection process. - The auditing feature within the metering business system identified the staff member responsible for the change and the staff member was required to undertake training in response to the error.	In response to the non-compliance, Western Power identified the staff member responsible for the change and the staff member was required to undertake training in response to the error. Further manual over-rides of data in the metering business system continue to be monitored and logged with the metering business system's auditing functionality.	No further action required.
455	A2 Electricity Industry Metering Code, clause 7.5 CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - Non-compliance related to the inadvertent disclosure of 327 customers' confidential information in FY2022 and 3 disclosures in FY2023, as a result of data being disclosed by another team within Western Power that is not associated with metering services. - Data response process involves data owner/data steward control. This procedure was in place at the time of the breach but has since been tightened to include a requirement to log requests for data through an internal IT system to trace how customer data moves between teams at Western Power. Additionally, a single point of contact has been designated to approve all data requests within Western Power and organisations external to Western Power. - In FY2023, 3 breaches of this obligation were recorded, as confidential data was inadvertently published on a social media site which affected 1 customer. Another instance involved the disclosure of customers' contact details during an online customer connection form. The last instance involved disclosure of customers details prior to receiving a letter of authority from the customer.	In response to the non-compliance, Western Power have tightened data security controls to include a requirement to log requests for data through an internal IT system to trace how customer data moves between teams at Western Power. Additionally, a single point of contact has been designated to approve all data requests within Western Power and organisations external to Western Power.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
467	A2 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 12(3) CutlerMerz finds that Western Power, as reported by Western Power, has not complied with this obligation in not meeting the standards with respect to outage duration and the number of interruptions. Given the nature of the non-compliances and that it may not be practicable to maintain 100% compliance through adverse climatic events, we find that its controls can be expected to, so far as reasonably practicable, ensure compliance. - Western Power continues to report a substantial number of incidents where the prescribed standards in the NQRS code for both outage duration and the number of interruptions were not met and reported non-compliances in its FY2021 and FY2022 Annual Compliance Reports, Western Power will also be reporting incidences on non-compliance in its FY2023 Annual Compliance Report. - The majority of the incidents were the result of extreme weather events.	In response to the non-compliances, Western Power has taken the following course of action: - Increased usage of emergency response generators and HV injection units, which in some cases can supply a whole town. - During Cyclone Seroja, the entire business went into response mode. New technologies were trialled, and analysis was performed, suggesting that SPS would be the best option in some circumstances. This forms a component of Western Power's wider strategy for the future grid. - As Western Power's network assets age, it plans to make increased usage of SPS in low-density areas as part of its corporate strategy. - Western Power is continually monitoring and reviewing the instances of non-compliance with the aim of further improving its performance. - In relevant investment and preparations, Western Power, with constraints on capital, aims to spend prudently for maximum impact.	No further action required.

A. Resolved during current audit period			
Licence obligation ref no. / Recommendation ref from previous audit	**Non-compliance / Controls improvement**	**Date resolved & Action taken by the licensee**	**Auditor's comments**
472	A2 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18 CutlerMerz finds that Western Power, as disclosed in its FY2022 Annual Compliance Report to the ERA, has not complied with this obligation in meeting the prescribed timeframe when making payments for non-notification of planned outages. - As disclosed in its breach records and FY2022 Annual Compliance report to the ERA, in one instance during the audit period, Western Power did not pay a customer the required service standard payment within 30 days of the claim, as prescribed by the NQRS Code. The cause of the non-compliance was due to a human error, some procedural steps had also not been followed in assessing the claim. - The reconciliation files (for the three financial years over the audit period) for service standard payments against Western Power's Ellipse payment data, do not show any additional non-compliances.	Western Power implemented a monthly reconciliation. The reconciliation entails a team member running two reports, one that shows all service standard payment claims for non-notification of planned outages that have been processed in the Ellipse system, and a separate comparative report that shows all the invoices that have been paid. Both reports contain an invoice number reference that is used for the comparison. This is to confirm that each invoice number in the system has been paid.	No further action required.
473	A2 Electricity Industry (Network Quality and Reliability of Supply) Code, clause 19 CutlerMerz finds that Western Power, as disclosed in its FY2022 Annual Compliance Report to the ERA, has not complied with this obligation in meeting the prescribed timeframe when making payments under its Extended Outage Payment Scheme. We find that after the process improvements that were made in response to the non-compliances, that its controls can be expected to, so far as reasonably practicable, ensure compliance. We determined the following: - As disclosed in its breach records and FY2022 Annual Compliance report to the ERA, of 40,848 payments made for interruptions exceeding 12 hours in FY2022, in 2 instances Western Power did not pay a customer the required service standard payment within 30 days of the claim, as prescribed by the NQRS Code. The cause of the non-compliance was attributed to failed payments caused by two distinct system errors that were not identified in the prescribed timeframe. - Western Power's EOPS Fortnightly Check spreadsheets, which show the details and timeframes associated with all EOPS payments and cover the entire audit period including FY2023, do not show any additional non-compliances.	- In response to this and previous non-compliances, Western Power implemented the following process improvements: - Western Power implemented fortnightly reconciliation. The fortnightly reconciliation entails a team member running two reports, one that shows all EOPS claims that have been processed in the Ellipse system and a separate comparative report that shows all the invoices that have been paid, both reports contain an invoice number reference that is used for the comparison. This is to confirm that each invoice number in the system has been paid. - Western Power's EOPS report now produces a different error in the event of an invalid BSB. The error now requires multiple contact attempts to be made with the customer, one by phone and one by email, all within 30 days. - Email notification of failed payments has since been automated to provide timely visibility in order to increase the opportunity to rectify within the prescribed timeframes. - Western Power also made changes to the 'Extended Outage' page under 'Make a claim' on its website, which now states customers need to have their BSB and Account number ready, and for them to take time to ensure their accuracy.	No further action required.

6.2 Non-Compliances, Unresolved - Recommendations

Table 8: Non-Compliances - Unresolved

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
1/2023 41	Obligation 41 Electricity Industry Customer Transfer Code, clause 4.13 B2 CutlerMerz finds that Western Power has not complied with this obligation in its failure to meet the timeframes associated with provision of notice to retailers in the aftermath of a customer transfer. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. - Western Power reported non-compliance incidences in its FY2021, FY2022 and FY2023 Annual Compliance Reports. - The primary cause of non-compliance is a delay between when the meter reading occurs and the time that the meter reading is uploaded into MBS. For manually read meters, the delay is caused when meter readers do not upload the data within the required timeframe. For remotely read meters, the delay can be caused by a communication failure. Once the final meter reading is uploaded to MBS, the retailer notification process is automated. - In FY2021 Western Power reported a rate of non-compliance was 2.95%, with ten retailers affected. This was primarily attributed to a back-log of meter exchange work impacted the loading of readings for newly installed meters and an increase in the number of manually read interval meters impacted on the availability of the contracted service provider. - In FY2022 Western Power reported a rate of non-compliance of 1.92%, with five retailers were affected. This was primarily attributed to the impact of Covid-19 both on internal resources available to Western Power, and also on the availability of third-party contract service providers, and the failure to obtain data on the first visit due to businesses being closed and not being able to access the meter. - In FY2023 Western Power reported a rate of non-compliance of 3.09%, with seven retailers were affected. This was primarily attributed to late meter readings for manually read interval meters, delays in field maintenance where communication devices fail to provide readings for customer transfers, and bulk transfer notification processes where a small subset are non-compliant.	CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[2]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.	In response to the non-compliance, Western Power has implemented the following measures to improve its performance: - Western Power is continuing with the planned rollout of remotely read AMI meters. - Increased the size of the team, which helps with the manual exception processes. Additionally, team members are incentivised to perform manual reads, and whilst a similar incentive was in place before, the incentive is higher. - Communications failures have reduced with increased 4G network coverage. - Western Power has commenced the process of upgrading its handheld metering devices.

[2] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
2/2023 50	Obligation 50 Electricity Industry Customer Transfer Code, clause 6.3(1) B2 CutlerMerz finds that Western Power has, in the strict interpretation of the obligation, not complied with this obligation in as it does not maintain a facsimile number for notices to be provided. We do, however believe that Western Power acts in the spirit of the obligation and it is otherwise compliant with this obligation and has strong controls associated with other aspects of this obligation. Given that the compliance implication was not considered in the decision to cease maintaining a facsimile number, we believe that Western Power's controls cannot be expected to as they stand, so far as reasonably practicable, ensure ongoing compliance with this obligation in the strictest sense. - Western Power no longer officially maintains a facsimile number. There is still a reference to a facsimile number on its 'service request terms and conditions' page which does not work. - Western Power provides for customers to contact them and provide notice through post, electronic communication and telephone. - Western Power's contact details are available and easily accessible through its website, and Western Power has controls to ensure that retailers are notified of a change in its contact details.	CutlerMerz recommends that Western Power reinstate a facsimile number for notification purposes.	N/A

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
3/2023 75	Obligation 75 Electricity Industry (Obligation to Connect) Regulations, regulation 6 B2 CutlerMerz finds that Western Power has not complied with this obligation in meeting the defined timeframes for performing connections. Given the nature of the non-compliances, we find that if may not be realistic or practicable to maintain 100% compliance. We do, however, find that Western Power's procedures to ensure that timeframes are understood by the field crews may be inadequate to, so far as reasonably practicable, ensure compliance. - Western Power was not compliant over the audit period. It reported in its FY2023 Annual Compliance Report to the ERA that 7 of 78 (8.97%) of obligation to connect projects for network extensions not more than 100 metres in length in FY2023, and 3 of 48 in FY2022 were not completed within timeframes agreed with the customer. This is due to the same reasons for non-compliance listed under obligation 77. - Western Power was compliant in FY2021, in part due to the low volume of obligation to connect projects during the Covid-19 pandemic. There were 12 obligation projects throughout the FY2021. - There have been less than five applicable deployments of stand-alone power systems over the audit period, and Western Power endeavours to meet the defined timeframes through engagement with customers to agree to conservative timeframes. - In some cases, Western Power will be delayed when the customer does not provide access and will put the job on hold until they get access, but these circumstances are not breaches of compliance due to Regulation 5(a) of the Obligations to Connect Code which requires the customer to provide access. - Field crews are notified of a required in-service date. Despite this, field crews interviewed at the regional Northam Depot stated that they generally targeted a 13-week timeframe in all circumstances did not demonstrate awareness of required in-service dates with reference to O2C jobs. Field crews do, however, communicate these connection timeframes with the customer.	CutlerMerz recommends that Western Power implement systems or procedures to ensure that timeframes are understood by the field crews responsible for connections and that extensions to the network and stand-alone power systems are delivered within the timeframes agreed by the customer in writing.	N/A

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
1/2023 244	Obligation 244 Code of Conduct, clause 54(1) B2 CutlerMerz finds that Western Power has not complied with this obligation in meeting the specified timeframes for reconnection. The rollout of AMI meters is expected to significantly improve Western Power's compliance performance. Given this, until the completion of the AMI meter rollout, we find that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. - Western Power reported instances of non-compliance in its FY2021, FY2022 and FY2023 Annual Compliance Reports. These were primarily the result of inability to obtain access to a site and site safety concerns (typically dogs, aggressive customers, insulation issues and locked gates), and the need for specialised field resources due to the circumstances of the site which resulted in delays when these staff were not immediately available. In some circumstances in FY2021 and FY2022 Covid-19 vaccination requirements and closed borders also reduced the availability of field resources. - Western Power's PowerBI dashboard that links directly to the metering business system (MBS) revealed that it also had instances of non-compliance in FY2023, also primarily due to site access issues. - The affected sites were individually case managed to ensure they were reconnected as soon as practicable. - In FY2020 the rate of non-compliance was 0.75%, which reduced to 0.49% in FY2021 and 0.17% in FY2023. - The improvement in the rate of compliance is primarily attributed to the rollout of AMI meters which are remotely connected and disconnected. Roughly half of Western Power's meters are now AMI meters, and the rollout is scheduled to conclude by the end of FY2027.	Refer to recommendation 1/2023 under obligation 41.	In response to the non-compliance, Western Power is continuing with the planned rollout of remotely read AMI meters.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
4/2023 297E	Obligation 297E Code of Conduct, clause 83(2) B2 CutlerMerz finds that, as reported to the ERA, Western Power has not complied with this obligation in meeting its obligation to update its LSE register. We note that the complete automation of the notification system requires cooperation with retailers, impacting the practicability of implementation. Given this, we believe that Western Power's controls can be expected to, so far as reasonably practicable, ensure ongoing compliance. - On 22 March 2023, Western Power notified the ERA of a non-compliance incident. Western Power did not add or update the email addresses of nine LSE customers within the required time between 20 February 2023 and 22 March 2023. - Although Western Power had registered the supply address and other contact details of these customers as required, it used another process for updating email addresses, which resulted in the delay and led to the Code breach. - None of the nine LSE customers were adversely affected, as they did not experience a planned or unplanned outage during this period. - Testing of 78 samples of changes to the LSE register selected at random throughout the audit period and examination of all monthly LSE register reconciliation files revealed no additional non-compliances with respect to the updating of the LSE register. - Further examination of the LSE register for non-compliance with respect to the timeframe to update email addresses did not reveal any additional non-compliances. Therefore, the non-compliance was limited to the nine LSE customers identified by Western Power. - Western Power has implemented an interim solution to automatically extract customer email addresses from notifications from retailers, and intends to implement a permanent solution that involves changing its systems for managing this information. This will require the agreement of retailers. The ERA will seek a status update from Western Power on these actions in November 2023.	CutlerMerz recommends that Western Power pursue and monitor the progress of the implementation of a permanent solution to update emails in the LSE register, and seek collaboration with retailers where necessary.	Western Power has implemented an interim solution to automatically extract the customer's email address from the retailer's notification and add it to its LSE register.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
1/2023 333	Obligation 333 Electricity Industry Metering Code, clause 3.9(3) B2 CutlerMerz finds that Western Power has not complied with this obligation to ensure that each metering installations meets all the requirements in Appendix 1 of the Electricity Industry Metering Code. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance. - Non-compliance related to accuracy of meter readings observed during testing. Western Power replaced meters that failed testing. The non-compliance affected 15 meters in FY2021 and no compliance breach in FY2022 or FY2023. - Western Power proactively identified the non-compliance and replaced the meter as required. - Metering technical services staff provided a walkthrough of the data visualisation tool used to inspect daily meter readings to ensure compliance of metering installations under Appendix 1 of the Metering Code. The data visualisation tool raises alarms on the quality of meter reads based on atypical patterns of energy data that may be indicative of a defective meter. Western Power also maintains a rigorous batch testing of meters in accordance with compliance requirements in Appendix 1 of the Metering Code prior to installation of meters in the field. - Western Power documents reasons for failed meter testing in metering performance quality reports and notes any non-compliance with the Metering Code in quarterly compliance reports that are submitted to executive staff at Western Power.	Refer to recommendation 1/2023 under obligation 41.	In response to the non-compliance, Western Power: - Is continuing with the planned rollout of remotely read AMI meters which assists in more thoroughly monitoring meter performance with energy data being downloaded daily, compared to manually read meters which provide data less frequently. - Continues to monitor meter performance with a data visualisation tool that raises alarms on the quality of meter reads based on atypical patterns of energy data that may be indicative of a defective meter.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
1/2023 385	Obligation 385 Electricity Industry Metering Code, clause 5.3(1) B2 Findings: CutlerMerz finds that Western Power has not complied with this obligation to obtain and transfer energy data from the meter installation to the MBS no later than 2 business days after the scheduled meter reading. with this obligation to ensure that each metering installations meets all the requirements in Appendix 1 of the Electricity Industry Metering Code. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. - The non-compliance related to meter energy data not being recorded and transferred to the metering business system database within the prescribed timeframes of 2 business days after the date of the scheduled meter read as per the Metering Code. The non-compliance in each year of the audit period was: FY2021 4.22% of basic scheduled meter readings 7.75% of Type 5 manually read interval meter readings FY2022 38.38% of basic scheduled meter readings 24.83% of Type 5 manually read interval meter readings FY2023 3.23% of basic scheduled meter readings 2.06% of Type 5 manually read interval meter readings - The reading operations team advised that the non-compliance over the audit period was heavily influenced by the COVID-19 pandemic and the availability of meter readers not responding to work requests, and border closures stifling the movement of staff available for meter reading. - Future compliance with this obligation is expected to be supported by the rollout of new type 4 remotely read meters will enable more automated meter reading capabilities that do not rely on staff to physically read meters and reduces the population of manually read meters for a given number of meter reading staff.	Refer to recommendation 1/2023 under obligation 41.	In response to the non-compliance, Western Power is continuing with the planned rollout of remotely read AMI meters.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
1/2023 386	Obligation 386 Electricity Industry Metering Code, clause 5.4(1) B2 CutlerMerz finds that Western Power has not complied with this obligation to undertake meter reading that passes the validation processes outlined in Appendix 2 of the Meter Code. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance. - The non-compliance relates to not undertaking a meter reading for every meter on the Western Power network at least once within 12 months. The number of meters unread was 15,093 in FY2023, 8,408 in FY2022, and 13,693 in FY2021. - Western Power conducts an annual read process that seeks customer contact within 2 months of the 12-month deadline to read the meter. - The main reason for these consistent non-compliances is the lack of access to customer sites to manually-read meters, where customers directly refuse access and Western Power staff may face safety risks in trying to enter the site. Western Power liaise directly with the police to discuss ways to access these sites safely. Some customers are permitted to send a photo of a meter which is examined by Western Power staff, from which the meter reading is taken. This arrangement is in places where it is not feasible for Western Power to send out a meter reader and must be approved by the retailer, as per the guidance listed on Western Power's website. - Western Power's continued rollout of AMI meters is expected to increase compliance with this obligation. However, Western Power may have to resort to developing a strategy with police to forcibly enter sites and perform a meter replacement where site access is continually blocked and entering the property creates a safety risk without police escorts. - The Metering Technical Services Team provided a walkthrough of a data visualisation dashboard that provides automated alerts to prompt meter reading well before deadlines. The data dashboard is monitored and updated daily, as meter reads are entered into the metering business system. The dashboard is a relatively new tool and has been refined over the last 2.5-3 years.	Refer to recommendation 1/2023 under obligation 41.	In response to the non-compliance, Western Power is continuing with the planned rollout of remotely read AMI meters. Western Power also continues to liaise directly with the police to discuss ways to access these sites safely and has developed an alert system that provides automated alerts to prompt meter reading well before deadlines.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
1/2023 391	Obligation 391 Electricity Industry Metering Code, clause 5.6(1) B2 CutlerMerz finds that Western Power has not complied with this obligation to provide validated energy data within the timeframes prescribed under the Meter Code. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance. - The non-compliance related to the provision of validated metered data within prescribed timeframes, affecting 1.28% in of meter reads and 37 market participants in FY2023, 2.11% of meter reads and 39 participants in FY2022 and 3.87% of meter reads and 17 retailers in FY2021. - Western Power has automated processes to collect and validate data and recently employed a data monitoring dashboard which is used to interrogate large volumes of meter reads for unusual customer consumption patterns. The Dashboard is updated daily and includes a visualisation of meter reading data including identifying locations on a geographic map via GPS. - The process is more automated for remotely read meters with data communicated via communication networks and downloaded daily to the MBS. Energy data taken from manually read meters is logged on an electronic device and uploaded and manually-read meters data actual/substitute reads required for type 5/6 manually read meters. - Western Power's continued rollout of AMI meters is expected to increase compliance with this obligation. - The Metering Technical Services Team provided a walkthrough of a data visualisation dashboard that provides automated alerts to prompt meter reading and identify validation failures well before deadlines. The data dashboard is monitored and updated daily, as meter reads are entered into the MBS. The dashboard is a relatively new tool and has been refined over the last 2.5-3 years. - Western Power continue to refine the automated validation process in the metering business system with better management of security configurations that have previously stopped automated validation processes working properly. The Metering Technical Services Team also advised that an increase in Western Power's data hosting capacity is expected to improve validation testing times for remotely read meters.	Refer to recommendation 1/2023 under obligation 41.	Western Power is continuing with the planned rollout of remotely read AMI meters. Western Power has also applied automated validation across a larger portion of the meter population that are now remotely read, contributing more efficient and timely validation process.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
5/2023 413	Obligation 413 Electricity Industry Metering Code, clause 5.20(4) B2 CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Report. CutlerMerz believes that the controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation. - Non-compliance related to failure to verify data within 5 business days and related to manually read meters. - Compliance with this obligation improved during FY2023, with 8.69% of requests for verified energy data not provided within the prescribed timeframe, compared to 19.65% in FY2022 and 31.16% in FY2021. - Compliance improved over recent years since the introduction of AMI (type 4 meters), and the accelerated rollout of these meters is expected to increase the speed that data can be verified and provide a timely response to meter verification requests. - An additional ICT solution is being developed to enhance the scope of automation in the validation process, including upgrade of data hosting capacity and better management of security configurations that can block automated processes in order to improve compliance with this obligation. - The reading operations team advised that the non-compliance over the audit period was heavily influenced by the COVID-19 pandemic and the availability of meter readers not responding to work requests, and border closures stifling the movement of staff available for meter reading.	Where the rollout of AMI will improve compliance with this obligation, CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[3]. Where the rollout of AMI will not improve compliance with this obligation, CutlerMerz recommends that Western Power review its current internal processes and their implementation to improve compliance with the prescribed timeframes.	Western Power is continuing with the planned rollout of remotely read AMI meters. Western Power has also applied automated validation across a larger portion of the meter population that are now remotely read, contributing more efficient and timely validation process.

[3] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
5/2023 415	Obligation 415 Electricity Industry Metering Code, clause 5.21(4) B2 CutlerMerz finds that Western Power has not complied with this obligation to conduct meter tests within the timeframe prescribed in the model service level agreement. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. - The non-compliance related to meter tests not being conducted within the timeframe prescribed in the model service level agreement. The non-compliance over the period affected 41 services requested in FY2021, 46 services requested in FY2022, and 60 services requested in FY2023. - The Metering Technical Services and Reading Management Teams advised that the non-compliance related to failing meters with 10-year-old network interface cards malfunctioning, resulting in interference with transmission of metered energy data. - The continued rollout of new AMI remotely read meters to replace older meters is expected to raise compliance performance with greater use of automated processes to collect, validate and send data. Western Power is undertaking an upgrade of data hosting capacity through the Utility IQ system and the field collection system that will enable greater use of remote service to enable higher quality testing of metered energy data via the current MV90 communication system. The rollout of AMI meters is expected to be complete by 2027 and is expected to improve compliance with this clause. The pace of the replacement program is adequate consider the scale of the replacement program across Western Power's metering fleet.	Refer to recommendation 5/2023 under obligation 413.	In response to the non-compliance, Western Power is continuing with the planned rollout of remotely read AMI meters. Western Power has also commenced an upgrade of its data hosting capacity that will enable greater use of remote service to enable higher quality testing of metered energy data.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
5/2023 447	Obligation 447 Electricity Industry Metering Code, clause 6.1(1) B2 CutlerMerz finds that Western Power has not complied with this obligation to services not delivered as per the model service level agreement. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance. - Non-compliance affected 1.39% of requested service orders in FY2021, 1.80% of requests in FY2022 and 1.42% of requests in FY2023. The non-compliance relates to services orders under the model service level agreement not delivered in accordance with the prescribed timeframes listed in the service level agreements. This represents 1.8% of 273,946 total service orders requested over 2022. In particular, the non-compliance resulted from not completing meter testing within the prescribed timeframes under obligation 415 of the Metering Code. The other non-compliance related to some meter reads incorrectly labelled as actuals which should have been labelled as substitute reads. - Western Power monitors compliance with the services it delivers under the model service level agreement with monthly compliance reports. The metering technical services team advised that the continued rollout of AMI meters is expected to improve compliance obligations in respect of services delivered under the model service level agreement. The remotely read features of these meters combined with automated capability to download and validate metered data, and user processing requests automatically via B2B processes will increase the efficiency of responding to user requests within the prescribed timeframes. The rollout of AMI meters is expected to be complete by 2027 and is expected to improve compliance with this clause. The pace of the replacement program is adequate considering the scale of the replacement program across Western Power's metering fleet, and is in line with industry practice.	Refer to recommendation 5/2023 under obligation 413.	In response to the non-compliance, Western Power is continuing with the planned rollout of remotely read AMI meters.

B. Unresolved at end of current audit period			
Recommendation reference/Licence obligation reference no.	**Non-compliance / Controls improvement**	**Auditor's recommendation**	**Action taken by the licensee by the end of audit period**
6/2023 497	Obligation 497 Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(a) B2 CutlerMerz finds that Western Power has not complied with this obligation in as its stand-alone power system engagement strategy does not contain all requisite information. We believe that Western Power should identify the compliance requirements for the contents of the SPS Engagement Strategy and ensure that all are included. During the audit, Western Power stated that the omitted information is commercially sensitive and that it would prefer not to publish such information in this format. In our opinion, we believe it would be possible to provide information that would comply with the obligation and not be commercially sensitive. We also note that there was no explanation provided in the SPS Engagement Strategy as to why the information was omitted, and do not find that Western Power's controls can be expected to, so far as reasonably practicable, ensure compliance. We determined the following: - The SPS Program Customer Engagement Strategy is Western Power's stand-alone power system engagement strategy. - Despite being endorsed by the minister, the SPS Program Customer Engagement Strategy does not contain indicative costs and specifications. As such, it does not comply with the requirements under sub regulation 10(3) of the Electricity Industry Licence Conditions Regulations and by extension, this obligation. It does, however, contain all the other specified fields.	CutlerMerz recommends that Western Power, at next review of the SPS Engagement Strategy, identify the compliance requirements for the contents of the SPS Engagement Strategy and ensure that all are included.	N/A

7 Performance Summary

Table 9 below lays out a summary of findings, with respect to both compliance and controls, for all obligations assessed in the audit. Compliance and controls ratings are derived in accordance with the ERA's 2019 Audit and Review Guidelines shown in Table 3 above.

Refer to the detailed findings Table 10 for further detail on each obligation.

Table 9: Performance Summary

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
9 Electricity Industry Customer Transfer Code – Licence Conditions and Obligations												
1.	Electricity Industry Customer Transfer Code, clause 2.2(1)(a)	5					N/P					N/R
2.	Electricity Industry Customer Transfer Code, clause 2.2(1)(b)	4					N/P					N/R
2A.	Electricity Industry Customer Transfer Code, clause 2.3	4					N/P					N/R
3.	Electricity Industry Customer Transfer Code, clause 3.1(1)(a)	4	A					1				
4.	Electricity Industry Customer Transfer Code, clause 3.1(1)(b)	4	A					1				
5.	Electricity Industry Customer Transfer Code, clause 3.1(2)	4	A									N/R
10.	Electricity Industry Customer Transfer Code, clause 3.7(1)	4	A					1				
11.	Electricity Industry Customer Transfer Code, clause 3.7(2)	4	A					1				
12.	Electricity Industry Customer Transfer Code, clause 3.8(1)	5	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
13.	Electricity Industry Customer Transfer Code, clause 3.8(2)	4	A					1				
15.	Electricity Industry Customer Transfer Code, clause 3.8(3)	4	A					1				
20.	Electricity Industry Customer Transfer Code, clause 3.10(1)	4	A					1				
21.	Electricity Industry Customer Transfer Code, clause 3.10(2)	4	A					1				
22.	Electricity Industry Customer Transfer Code, clause 4.1	4	A					1				
31.	Electricity Industry Customer Transfer Code, clause 4.9(1)	4	A					1				
32.	Electricity Industry Customer Transfer Code, clause 4.9(2)	4	A					1				
33.	Electricity Industry Customer Transfer Code, clause 4.9(3)	4	A					1				
34.	Electricity Industry Customer Transfer Code, clause 4.9(6)	4	A					1				
35.	Electricity Industry Customer Transfer Code, clause 4.10(1)	2	A					1				
36.	Electricity Industry Customer Transfer Code, clause 4.10(2)	4	A					1				
37.	Electricity Industry Customer Transfer Code, clause 4.10(3)	4	A					1				
38.	Electricity Industry Customer Transfer Code, clause 4.11(1)	4	A					1				
39.	Electricity Industry Customer Transfer Code, clause 4.11(3)	2	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
40.	Electricity Industry Customer Transfer Code, clause 4.12(3)	5	A					1				
41.	Electricity Industry Customer Transfer Code, clause 4.13	2		B					2			
42.	Electricity Industry Customer Transfer Code, clause 4.14	4	A					1				
43.	Electricity Industry Customer Transfer Code, clause 4.15	5	A					1				
48.	Electricity Industry Customer Transfer Code, clause 5.2	4	A					1				
48A.	Electricity Industry Customer Transfer Code, clause 6.1	4	A					1				
49.	Electricity Industry Customer Transfer Code, clause 6.2	4	A					1				
50.	Electricity Industry Customer Transfer Code, clause 6.3(1)	5		B					2			
51.	Electricity Industry Customer Transfer Code, clause 6.3(2)	4					N/P					N/R
54.	Electricity Industry Customer Transfer Code, clause 6.6	4	A					1				
55.	Electricity Industry Customer Transfer Code, clause 7.1(1)	5					N/P					N/R
56.	Electricity Industry Customer Transfer Code, clause 7.1(2)	5					N/P					N/R
57.	Electricity Industry Customer Transfer Code, clause 7.1(3)	4					N/P					N/R
58.	Electricity Industry Customer Transfer Code, clause 7.2(4)	4					N/P					N/R

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
59.	Electricity Industry Customer Transfer Code, clause 7.3(2)	5					N/P					N/R
60.	Electricity Industry Customer Transfer Code, Annex 1	4	A					1				
61.	Electricity Industry Customer Transfer Code, Annex 2	4	A					1				
62.	Electricity Industry Customer Transfer Code, Annex 3	4	A					1				
63.	Electricity Industry Customer Transfer Code, Annex 4 clause A4.1	4	A					1				
64.	Electricity Industry Customer Transfer Code, Annex 4 clause A4.2	4	A					1				
65.	Electricity Industry Customer Transfer Code, Annex 5 clause A5.1(5)	4	A					1				
66.	Electricity Industry Customer Transfer Code, Annex 5 clause A5.1(6)	4	A					1				
67.	Electricity Industry Customer Transfer Code, Annex 5 clause A5.1(7)	4	A					1				
10 Electricity Industry (Obligation to Connect) Regulations – Licence Conditions and Obligations												
72.	Electricity Industry (Obligation to Connect) Regulations, regulation 4	4	A					1				
73.	Electricity Industry (Obligation to Connect) Regulations, regulation 5(5)	4	A					1				
74.	Electricity Industry (Obligation to Connect) Regulations, regulation 5(6)	4	A					1				
75.	Electricity Industry (Obligation to Connect) Regulations, regulation 6	4		B					2			

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
76.	Electricity Industry (Obligation to Connect) Regulations, regulation 7(1)	4	A					1				
77.	Electricity Industry (Obligation to Connect) Regulations, regulation 8	2	A						2			
77A.	Electricity Industry (Obligation to Connect) Regulations, regulation 12(1)	3	A					1				
11 Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations												
99.	Electricity Industry (Customer Contracts) Regulations, regulation 36	4	A					1				
12 Electricity Industry Act - Licence Conditions and Obligations												
101.	Electricity Industry Act, section 13(1)	4	A					1				
102.	Electricity Industry Act, section 14(1)(a)	4	A					1				
103.	Electricity Industry Act, section 14(1)(b)	4					N/P					N/R
104.	Electricity Industry Act, section 14(1)(c)	4	A					1				
105.	Economic Regulation Authority (Licensing Funding) Regulations 2014	2	A					1				
106.	Electricity Industry Act, section 31(3)	5	A					1				
107.	Electricity Industry Act, section 41(6)	4	A					1				
111.	Electricity Industry Act, section 101	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
13 Electricity Licences – Licence Conditions and Obligations												
119.	Distribution Licence, condition 4.3.1 Generation Licence, condition 4.3.1 Integrated Regional Licence, condition 4.3.1 Retail Licence, condition 4.3.1 Transmission Licence, condition 4.3.1	4	A					1				
120.	Distribution Licence, condition 5.2.4 Generation Licence, condition 5.2.4 Integrated Regional Licence, condition 5.2.4 Retail Licence, condition 5.2.4 Transmission Licence, condition 5.2.4	4					N/P					N/R
121.	Distribution Licence, condition 5.3.2 Generation Licence, condition 5.3.2 Integrated Regional Licence, condition 5.3.2 Retail Licence, condition 5.3.2 Transmission Licence, condition 5.3.2	4	A					1				
122.	Distribution Licence, condition 5.1.5 Generation Licence, condition 5.1.5 Integrated Regional Licence, condition 5.1.5 Transmission Licence, condition 5.1.5	4	A					1				
123.	Distribution Licence, condition 4.4.1 Generation Licence, condition 4.4.1 Integrated Regional Licence, condition 4.4.1 Retail Licence, condition 4.4.1 Transmission Licence, condition 4.4.1	4					N/P					N/R

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
124.	Distribution Licence, condition 4.5.1 Generation Licence, condition 4.5.1 Integrated Regional Licence, condition 4.5.1 Retail Licence, condition 4.4.1 Transmission Licence, condition 4.5.1	2	A						2			
125.	Distribution Licence, condition 3.8.1 and 3.8.2 Generation Licence, condition 3.8.1 and 3.8.2 Integrated Regional Licence, condition 3.8.1 and 3.8.2 Retail Licence, condition 3.8.1 and 3.8.2 Transmission Licence, condition 3.8.1 and 3.8.2	4	A					1				
126.	Distribution Licence, condition 3.7.1 Generation Licence, condition 3.7.1 Integrated Regional Licence, condition 3.7.1 Retail Licence, condition 3.7.1 Transmission Licence, condition 3.7.1	4	A					1				
127.	Distribution Licence, condition 6.9.1 Integrated Regional Licence, condition 6.9.1	2	A					1				
128.	Distribution Licence, condition 6.9.3 Integrated Regional Licence, condition 6.9.3	2					N/P					N/R
14 Code of Conduct – Licence Conditions and Obligations												
Disconnection & Interruptions												

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
233.	Code of Conduct, clause 7.5	4	A						2			
234.	Code of Conduct, clause 52	2	A					1				
237.	Code of Conduct, clause 7.7(3)	2		B				1				
238.	Code of Conduct, clause 7.7(4)	2	A					1				
238A.	Code of Conduct, clause 7.7(4A)	5	A					1				
239.	Code of Conduct, clause 7.7(5)	5	A					1				
241.	Code of Conduct, clause 7.7(7)	4	A					1				
Reconnection												
244.	Code of Conduct, clause 54(1)	1*		B					2			
244A	Code of Conduct, clause 54(3)	2	A					1				
245.	Code of Conduct, clause 9.1(2)	4	A					1				
Pre-payment meters												
256.	Code of Conduct, clause 58(5)	4	A									N/R
258.	Code of Conduct, clause 59(2)	2	A									N/R

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
263.	Code of Conduct, clause 63(2)	4	A									N/R
Information and communications												
283.	Code of Conduct, clause 10.6	4	A					1				
283A	Code of Conduct, clause 75(1)	4	A					1				
283B	Code of Conduct, clause 75(3)	4	A					1				
283C	Code of Conduct, clause 75(4)	4	A					1				
283D	Code of Conduct, clause 76	4	A					1				
284.	Code of Conduct, clause 10.7(1)	4	A					1				
285.	Code of Conduct, clause 10.7(2)	4	A					1				
286.	Code of Conduct, clause 10.7(3)	4	A					1				
287.	Code of Conduct, clause 10.7(4)	4	A					1				
288.	Code of Conduct, clause 10.8(1)	4	A					1				
289.	Code of Conduct, clause 10.8(2)	4	A					1				
290.	Code of Conduct, clause 77	5	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
291.	Code of Conduct, clause 10.10(1)	4	A					1				
292.	Code of Conduct, clause 10.10(2)	4	A					1				
294.	Code of Conduct, clause 78(1)	4	A					1				
295.	Code of Conduct, clause 78(2)	4	A					1				
296.	Code of Conduct, clause 79(1)	4	A					1				
297A.	Code of Conduct, clause 80	4	A					1				
297E	Code of Conduct, clause 83(2)	2		B					2			
297F	Code of Conduct, clause 84(1)	2	A					1				
297G	Code of Conduct, clause 84(3)	4	A					1				
297(M)	Code of Conduct, clause 86(7)	4	A					1				
297(N)	Code of Conduct, clause 86(8)	4	A					1				
Complaints & dispute resolution												
298.	Code of Conduct, clause 87(1)	4	A					1				
299.	Code of Conduct, clause 87(2)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
299A	Code of Conduct, clause 87(3)	4	A					1				
300.	Code of Conduct, clause 12.1(3)	4	A					1				
301.	Code of Conduct, clause 88	2	A						2			
301A	Code of Conduct, clause 89	2	A					1				
303.	Code of Conduct, clause 12.3	4	A					1				
304.	Code of Conduct, clause 90	4	A					1				
Reporting												
305.	Code of Conduct, clause 13.1	4	A					1				
306.	Code of Conduct, clause 13.2	4	A					1				
307.	Code of Conduct, clause 13.3	4	A					1				
Service standard payments												
309.	Code of Conduct, clause 94(3)	4					N/P					N/R
311.	Code of Conduct, clause 95(3)	4					N/P					N/R
313.	Code of Conduct, clause 14.4(1)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
313A	Code of Conduct, clause 97(1) and (2)	4	A					1				
314.	Code of Conduct, clause 14.5	4	A					1				
314A.	Code of Conduct, clause 98(1) and (2)	4	A					1				
316.	Code of Conduct, clause 100(2)	4	A					1				
15 Electricity Industry Metering Code – Licence Conditions and Obligations												
317.	Electricity Industry Metering Code, clause 2.2(1)(a)	5	A					1				
318.	Electricity Industry Metering Code, clause 2.2(1)(b)	4	A					1				
319.	Electricity Industry Metering Code, clause 3.1	4	A					1				
320.	Electricity Industry Metering Code, clause 3.2(1)	4	A					1				
320A.	Electricity Industry Metering Code, clause 3.2(2B)	3	A					1				
321.	Electricity Industry Metering Code, clause 3.3(1)	4	A					1				
322.	Electricity Industry Metering Code, clause 3.3(3)	4	A					1				
323.	Electricity Industry Metering Code, clause 3.3A(1)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
325.	Electricity Industry Metering Code, clause 3.3C	4	A					1				
326.	Electricity Industry Metering Code, clause 3.5(1) and (2)	4	A						2			
327.	Electricity Industry Metering Code, clause 3.5(3)	4	A					1				
328.	Electricity Industry Metering Code, clause 3.5(4)	4	A					1				
329.	Electricity Industry Metering Code, clause 3.5(6)	4	A					1				
330.	Electricity Industry Metering Code, clause 3.5(9)	4	A					1				
331.	Electricity Industry Metering Code, clause 3.7	4	A					1				
332.	Electricity Industry Metering Code, clause 3.8	4	A					1				
333.	Electricity Industry Metering Code, clause 3.9(3)	2		B					2			
334.	Electricity Industry Metering Code, clause 3.9(7)	4	A					1				
335.	Electricity Industry Metering Code, clause 3.9(9)	4	A					1				
336.	Electricity Industry Metering Code, clause 3.10	4	A						2			
337.	Electricity Industry Metering Code, clause 3.11(1)	4	A					1				
338.	Electricity Industry Metering Code, clause 3.11(2)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
340.	Electricity Industry Metering Code, clause 3.11A(1)	4	A					1				
341.	Electricity Industry Metering Code, clause 3.11A(2)	2	A						2			
342.	Electricity Industry Metering Code, clause 3.12(1)	4	A					1				
343.	Electricity Industry Metering Code, clause 3.12(2)	4	A					1				
344.	Electricity Industry Metering Code, clause 3.12(3)	4	A					1				
345.	Electricity Industry Metering Code, clause 3.12(4)	4	A					1				
346.	Electricity Industry Metering Code, clause 3.13(1)	4	A					1				
347.	Electricity Industry Metering Code, clause 3.13(3)(c)	4	A					1				
348.	Electricity Industry Metering Code, clause 3.13(4)	4	A					1				
349.	Electricity Industry Metering Code, clause 3.14(3)	4	A					1				
350.	Electricity Industry Metering Code, clause 3.16(1)	4	A					1				
350A.	Electricity Industry Metering Code, clause 3.16(1A)	3	A					1				
351.	Electricity Industry Metering Code, clause 3.16(2)	4	A					1				
352.	Electricity Industry Metering Code, clause 3.16(3)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
353.	Electricity Industry Metering Code, clause 3.16(3A)	4	A					1				
353A.	Electricity Industry Metering Code, clause 3.16(3B)	3	A					1				
353B.	Electricity Industry Metering Code, clause 3.16(3C)	3	A					1				
354.	Electricity Industry Metering Code, clause 3.18(1)	4	A					1				
354A.	Electricity Industry Metering Code, clause 3.18(A)	3	A					1				
355.	Electricity Industry Metering Code, clause 3.20(1)	4	A					1				
356.	Electricity Industry Metering Code, clause 3.20(3)	4	A					1				
357.	Electricity Industry Metering Code, clause 3.21(1)	2	A						2			
358.	Electricity Industry Metering Code, clause 3.21(2)	4	A					1				
359.	Electricity Industry Metering Code, clause 3.22	4	A					1				
360.	Electricity Industry Metering Code, clause 3.23(a)	4	A					1				
361.	Electricity Industry Metering Code, clause 3.23(b)	4	A					1				
362.	Electricity Industry Metering Code, clause 3.24A(1)	4	A					1				
363.	Electricity Industry Metering Code, clause 3.24B(1)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
364.	Electricity Industry Metering Code, clause 3.27	4	A					1				
365.	Electricity Industry Metering Code, clause 3.29	4	A					1				
366.	Electricity Industry Metering Code, clause 4.1(1)	4	A					1				
367.	Electricity Industry Metering Code, clause 4.1(2)	4	A					1				
368.	Electricity Industry Metering Code, clause 4.1(3)	4	A					1				
369.	Electricity Industry Metering Code, clause 4.2(1)	4	A					1				
370.	Electricity Industry Metering Code, clause 4.3(1)	4	A					1				
371.	Electricity Industry Metering Code, clause 4.4(1)	5	A					1				
372.	Electricity Industry Metering Code, clause 4.5(1)	5	A					1				
374.	Electricity Industry Metering Code, clause 4.6(1)	4	A					1				
375.	Electricity Industry Metering Code, clause 4.6(2)	4	A					1				
376.	Electricity Industry Metering Code, clause 4.7(1)	2	A						2			
377.	Electricity Industry Metering Code, clause 4.8(3)	4	A					1				
378.	Electricity Industry Metering Code, clause 4.8(3A)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
379.	Electricity Industry Metering Code, clause 4.8(4)(a)	4	A					1				
380.	Electricity Industry Metering Code, clause 4.8(4)(b)	4	A					1				
381.	Electricity Industry Metering Code, clause 4.8(5)	4	A					1				
382.	Electricity Industry Metering Code, clause 4.9	4	A					1				
383.	Electricity Industry Metering Code, clause 5.1 (1)	5	A					1				
384.	Electricity Industry Metering Code, clause 5.1(2)	5	A					1				
385.	Electricity Industry Metering Code, clause 5.3(1)	2		B					2			
385A.	Electricity Industry Metering Code, clause 5.3(2)	3	A					1				
385B.	Electricity Industry Metering Code, clause 5.3(3)	3	A					1				
386.	Electricity Industry Metering Code, clause 5.4(1)	1*		B					2			
387.	Electricity Industry Metering Code, clause 5.4(1A)	4	A					1				
389.	Electricity Industry Metering Code, clause 5.5(2)	4	A					1				
390.	Electricity Industry Metering Code, clause 5.5(2A)	4	A					1				
391.	Electricity Industry Metering Code, clause 5.6(1)	1*		B					2			

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
391A.	Electricity Industry Metering Code, clause 5.6(3)	3	A					1				
391B.	Electricity Industry Metering Code, clause 5.6(5)	3	A					1				
392.	Electricity Industry Metering Code, clause 5.7	4	A					1				
393.	Electricity Industry Metering Code, clause 5.8	4	A					1				
394.	Electricity Industry Metering Code, clause 5.9	4	A					1				
395.	Electricity Industry Metering Code, clause 5.10	4	A					1				
396.	Electricity Industry Metering Code, clause 5.11	4	A					1				
397.	Electricity Industry Metering Code, clause 5.12(1)	1*	A						2			
398.	Electricity Industry Metering Code, clause 5.13	4	A					1				
399.	Electricity Industry Metering Code, clause 5.14(3)	4	A					1				
400.	Electricity Industry Metering Code, clause 5.15	4	A					1				
403.	Electricity Industry Metering Code, clause 5.17A(1)	4	A					1				
404.	Electricity Industry Metering Code, clause 5.17A(3)	1*	A						2			
409.	Electricity Industry Metering Code, clause 5.19(5)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
411.	Electricity Industry Metering Code, clause 5.20(1)	4	A					1				
412.	Electricity Industry Metering Code, clause 5.20(2)	4	A					1				
413.	Electricity Industry Metering Code, clause 5.20(4)	2		B					2			
414.	Electricity Industry Metering Code, clause 5.21(2)	4	A					1				
415.	Electricity Industry Metering Code, clause 5.21(4)	2		B					2			
418.	Electricity Industry Metering Code, clause 5.21(8)	4	A					1				
419.	Electricity Industry Metering Code, clause 5.21(9)	4	A					1				
420.	Electricity Industry Metering Code, clause 5.21(11)	4	A					1				
421.	Electricity Industry Metering Code, clause 5.21(12)	4					N/P					N/R
422.	Electricity Industry Metering Code, clause 5.22(1)	4	A					1				
423.	Electricity Industry Metering Code, clause 5.22(2)	2	A					1				
424.	Electricity Industry Metering Code, clause 5.22(3)	4	A					1				
425.	Electricity Industry Metering Code, clause 5.22(4)	4	A					1				
426.	Electricity Industry Metering Code, clause 5.22(5)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
427.	Electricity Industry Metering Code, clause 5.22(6)	4	A					1				
428.	Electricity Industry Metering Code, clause 5.23(1)	4	A					1				
429.	Electricity Industry Metering Code, clause 5.23(3)	4	A					1				
430.	Electricity Industry Metering Code, clause 5.24(1)	4	A					1				
431.	Electricity Industry Metering Code, clause 5.24(2)	4	A					1				
432.	Electricity Industry Metering Code, clause 5.24(3)	4	A					1				
433.	Electricity Industry Metering Code, clause 5.24(4)	4	A					1				
434.	Electricity Industry Metering Code, clause 5.25	1*	A						2			
436.	Electricity Industry Metering Code, clause 5.29	4					N/P					N/R
437.	Electricity Industry Metering Code, clause 5.30(1)	4					N/P					N/R
438.	Electricity Industry Metering Code, clause 5.31(1)	4					N/P					N/R
439.	Electricity Industry Metering Code, clause 5.31(2)	4					N/P					N/R
440.	Electricity Industry Metering Code, clause 5.34(2)	4					N/P					N/R
441.	Electricity Industry Metering Code, clause 5.37(1)(a)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
442.	Electricity Industry Metering Code, clause 5.37(1)(b)	4	A					1				
443.	Electricity Industry Metering Code, clause 5.37(1)(b)	4	A					1				
444.	Electricity Industry Metering Code, clause 5.37(2)	4	A					1				
445.	Electricity Industry Metering Code, clause 5.37(3)	4	A					1				
446.	Electricity Industry Metering Code, clause 5.38	4	A					1				
447.	Electricity Industry Metering Code, clause 6.1(1)	2		B					2			
448A.	Electricity Industry Metering Code, clause 6.2	5	A					1				
448B.	Electricity Industry Metering Code, clause 6.18	5	A					1				
448C	Electricity Industry Metering Code, clause 6.19A(1)	5	A					1				
448D	Electricity Industry Metering Code, clause 6.19B(1)	5	A					1				
449.	Electricity Industry Metering Code, clause 6.20(4)	5	A					1				
450.	Electricity Industry Metering Code, clause 6.20(5)	4	A					1				
450A.	Electricity Industry Metering Code, clause 6.22	3	A					1				
451.	Electricity Industry Metering Code, clause 7.2(1)	5	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
452.	Electricity Industry Metering Code, clause 7.2(2)	4					N/P					N/R
455.	Electricity Industry Metering Code, clause 7.5	1*	A						2			
456.	Electricity Industry Metering Code, clause 7.6(1)	4	A					1				
457.	Electricity Industry Metering Code, clause 8.1(1)	5					N/P					N/R
458.	Electricity Industry Metering Code, clause 8.1(2)	5					N/P					N/R
459.	Electricity Industry Metering Code, clause 8.1(3)	5					N/P					N/R
460.	Electricity Industry Metering Code, clause 8.1(4)	4					N/P					N/R
461.	Electricity Industry Metering Code, clause 8.3(2)	5					N/P					N/R
16 Electricity Industry (Network Quality and Reliability of Supply) Code												
462.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 5(1)	5	A					1				
463.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 8	5	A					1				
464.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 9	4	A					1				
465.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(1)	5	A					1				
466.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 10(2)	5	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
467.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 12(3)	2	A						2			
468.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(2)	4	A					1				
469.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13(3)	4	A					1				
469A.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13B	5	A					1				
469B.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 13C	5	A					1				
470.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 14(8)	4	A									N/R
471.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 15(2)	4					N/P					N/R
472.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 18	1*	A						2			
473.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 19	1*	A						2			
474.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(1)	4	A					1				
475.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(2)	4	A					1				
476.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 21(3)	4	A					1				
477.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(1)	5	A					1				
478.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 23(2)	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
479.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(3)	3		B				1				
480.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 24(4)	4	A					1				
481.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(2)	4	A					1				
482.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 25(3)	4		B				1				
483.	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(1) and (2)	4	A					1				
483A.	Electricity Industry (Network Quality and Reliability of Supply) Code, clauses 26(3) and (4)	4	A					1				
483B.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 26(5)	4	A					1				
484.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(1)	4	A					1				
485.	Electricity Industry (Network Quality and Reliability of Supply) Code, clause 27(3)	4	A					1				
17 Electricity Licences – Licensee Specific Conditions and Obligations												
490.	Electricity Industry Act, sections 61 and 65	4					N/P					N/R
491.	Electricity Industry Act, sections 62, 64 and 65	4					N/P					N/R
492.	Electricity Industry Act, sections 65	4					N/P					N/R
493.	Electricity Industry Act, sections 11	4	A					1				

Reference No.	Licence obligation	Audit priority	Controls Rating					Compliance Rating				
			A	B	C	D	N/P	1	2	3	4	N/R
494.	Electricity Industry Act, sections 11	4					N/P					N/R
497.	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(a)	3		B					2			
498.	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(b)	3	A					1				
499.	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(c)	3	A					1				
500.	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(d)	3	A					1				
501.	Electricity Industry (Licence Conditions) Regulations, regulation 10(2)(e)	3	A					1				

8 Detailed Findings

Table 10 below presents our detailed findings, evidence, audit interviews procedures used, assessment of controls and compliance, and recommendations by obligation.

Table 10: Detailed Findings

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
9 Electricity Industry Customer Transfer Code – Licence Conditions and Obligations					
1.	A network operator must treat all retailers, which are its associates on an arms-length basis.	5	Obligations 1 to 2 CutlerMerz has interviewed key personnel from Customer Relations and examined documentation of Western Power's organisational structure. We determined the following: - There is no organisational crossover between Western Power and other market participants. - Nothing has changed during the audit period with respect to the organisational structure as it pertains to relationships with retailers. - Western Power seeks to treat all entities that it conducts business with equitably. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R
2.	A network operator must ensure that no retailer which is its associate receives a benefit in respect of the Electricity Industry Customer Transfer Code unless the benefit is either attributable to the arms-length application of the Electricity Industry Customer Transfer Code or the benefit is made available to all other retailers.	4		N/P	N/R
2A.	A network operator must prepare a report (for each year ending 30 June) as specified by the ERA; give a copy of the report to the Minister and the ERA at least 5 business days before it is published under clause 2.3(1)(c); and publish the report in accordance with clauses 1.6 and 2.3(2).	4	CutlerMerz has interviewed key personnel from Regulatory Compliance and Meter Data Management, and examined relevant communications. We have determined that the ERA has never required Western Power to provide such a report under the Customer Transfer Code over the audit period. We also determined that if the ERA were to require Western Power to prepare such a report, that the responsibility for preparation, provision to the minister, and publishing would sit with the Regulatory Compliance team. The procedures and controls are largely common with those for producing other annual reports that the ERA has, over the audit period, required Western Power to prepare under other Codes for their licences. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R
3.	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.	4	Obligations 3 to 5 CutlerMerz has interviewed key personnel from Regulatory Compliance and Meter Data Management, conducted a walkthrough of the Metering Service Centre, and examined Western Power's printable version of its request for standing and historical data forms, its head office, and other relevant documentation. We determined the following: - The principal method through which standing and historical data requests are made is through the online form which is available via Western Power's Metering Service Centre. - The online forms explicitly requires retailers to provide the requisite information specified in Annex 1 for the standing data form and Annex 2 for the historical data form, of the Electricity Industry Transfer Code. - Hard copies are made available at its principle places of business, and Western Power will print a hard copy for removal, on request and at no cost	A	1
4.	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.	4		A	1
5.	If a network operator publishes an amended data request form, it must comply with Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code, as applicable.	4		A	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			to the person in a timely fashion. - The online forms explicitly state that the NMI and the checksum are entered as a continuous number, but the printable version does not explicitly state this. - If the NMI provided by the retailer in completing the data request has incorrect characters the system will automatically reject the request. - The forms were not amended during the audit period, and procedures surrounding amendments, which are stipulated in the Build Pack, outline controls that align with both the requirements of Annex 1 for the standing data form and Annex 2 for the historical data form, and Western Power's obligation to publish the forms. Findings: CutlerMerz finds that Western Power has complied with obligations 3 and 4 as its request for standing data and historical data forms require retailers to provide the information specified in Annexes 1 and 2 of the Electricity Industry Customer Transfer Code respectively. We also find that it has complied with obligation 5 in publishing the forms in the specified manner. CutlerMerz finds that it is controls can be expected to ensure ongoing compliance but does identify an opportunity for improvement. The online form explicitly states that the NMI and checksum should be entered as a continuous number, but the printable version of the form does not explicitly state this. We propose that the printable version of the form be amended to explicitly state this.		
10.	A network operator must, subject to clause 3.7(3) of the Electricity Industry Customer Transfer Code, electronically notify a retailer if its data request is not valid.	4	Obligations 10 to 15 CutlerMerz has interviewed key personnel from Meter Data Management, conducted walkthrough of the Metering Service Centre and Metering Business System (MBS), examined Western Power's Communication Rules and Meter Data Management High Level compliance controls master document, and reviewed the procedures and processes in place for handling data requests. For context, the Electricity Industry Customer Transfer Code states the following with respect to valid data requests: "For a notification from a retailer to be valid, unless otherwise agreed with a network operator, a retailer— (a) must submit a data request to the network operator electronically; and (b) must not submit to a network operator in a business day— (i) more than 100 requests for standing data; and (ii) more than 100 requests for historical consumption data. If on a business day a retailer has already submitted the maximum number of a type of data request permitted under (1)(b), then (unless the network operator and retailer agree otherwise) any further data requests of that type submitted by the retailer to the network operator on that business day are not valid." We determined the following: - Invalid data requests received through the Metering Service Centre or B2B system are automatically rejected by the metering management system with one hour. - If a request were to be received by post the retailer would be required to complete the print-out version of the data request form, but this has not occurred during the audit period or since 2006. Western Power has 16 meter data analysts which would manage the exceptions. - Data queries and the actual meter data are both managed in the same meter data management system, and there is minimal transition between different systems. - If the NMI provided by the retailer in completing the data request has incorrect characters the system will automatically reject the request. - In roughly 98% of the cases, the retailer was provided the data in one business day, and the system can perform 100 within one day. As such, the system does not distinguish between the one and two business day timelines prescribed in the Electricity Industry Customer Transfer Code. Only in	A	1
11.	A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.	4		A	1
12.	A network operator must use all reasonable endeavours to provide to the retailer the requested data under a valid data request.	5		A	1
13.	The network operator must (subject to clause 3.8(3)) provide the requested data under clause 3.8(1) electronically, in accordance with the communication rules.	4		A	1
15.	If a retailer submits a data request under clause 3.4 and the network operator has not allocated a NMI for the contestable customer's connection point and is unable to determine a single connection point related to the data request, then the network operator must within one business day after receiving the request electronically notify the retailer of the most likely connection points to which a data request relates, up to a maximum of 10.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			unusual and unexpected circumstances has it taken Western Power to provide the data between one and two business days. - In all circumstances over the audit period, Western Power was compliant with the timeframes specified in the Electricity Industry Customer Transfer Code. - Western Power's provision of data is consistent with its Communication Rules. - Western Power reports the performance against this obligation in its monthly compliance reports. - Through Western Power's NMI Discovery, the MBS is able to provide the most likely connection points based on location information up to a maximum of 10. Findings: CutlerMerz finds that Western Power has complied with these obligations in providing notification of invalid data requests and its provision of data on request, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.		
20.	A network operator must not charge for the provision of standing data.	4	CutlerMerz has interviewed key personnel from Meter Data Management, examined relevant communications, and conducted a walkthrough of the Metering Service Centre. We determined that Western Power does not charge for the provision of standing data. Findings: CutlerMerz finds that Western Power has complied with the Electricity Industry Customer Transfer Code in not charging for the provision of standing data, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
21.	A network operator must not charge more than the defined amount for the provision of historical consumption data. The charge is to be determined under the metering code, or, if the metering code does not provide means for determining the charge, by an agreement between the network operator and retailer.	4	CutlerMerz has interviewed key personnel from Meter Data Management, conducted a walkthrough of the Metering Service Centre, and examined Western Power's website. We determined the following: - Western Power does not charge market participants for the provision of historical consumption data. - Western Power states on its website that they charge a flat fee of $9.85 for the provision of historical data to 3rd parties, this is an estimate of the costs to be recovered, and does not allow for Western Power to make a profit through this channel. - Despite the website claiming that they will charge for the provision of historical consumption data to 3rd parties, and that the Electricity Industry Customer Transfer Code permits them to do so in the manner that they claim they will, the interviewee confirmed that Western Power has not yet, charged 3rd parties for the provision of historical consumption data. Western Power does, however, intend to do so in the future. Findings: CutlerMerz finds that Western Power has complied with the Electricity Industry Customer Transfer Code in not charging more than the defined amount for the provision of historical consumption data, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
22.	A network operator must publish a customer transfer request form, which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance and Meter Data Management, conducted a walkthrough of the Metering Service Centre, and examined Western Power's printable version of its customer transfer request form, its head office, and other relevant documentation. We determined the following: - The principal method through which customer transfer requests are made is through the online form which is available via Western Power's Metering Service Centre. - The online form explicitly requires retailers to provide the requisite information specified in Annex 3 of the Electricity Industry Transfer Code. - Hard copies are made available at its principle places of business, and Western Power will print a hard copy for removal, on request and at no cost to the person in a timely fashion. - The online form explicitly states that the NMI and the checksum are entered as a continuous number, but the printable version does not explicitly state this. - The form was not amended during the audit period, and procedures surrounding amendments, which are stipulated in the Build Pack, outline controls that align with the requirements of Annex 3, and Western Power's obligation to publish the form. Findings: CutlerMerz finds that Western Power has complied with this obligation as its customer transfer request form requires retailers to provide the information specified in Annex 3 of the Electricity Industry Customer Transfer Code, and it has met its obligation to publish the form in the manner specified. CutlerMerz also finds that it is controls can be expected to ensure ongoing compliance but does identify an opportunity for improvement. The online form explicitly states that the NMI and checksum should be entered as a continuous number, but the printable version of the form does not explicitly state this. We propose that the printable version of the form be amended to explicitly state this.	A	1
31.	A network operator must object to a customer transfer request in certain circumstances as set out in clause 4.9(1) of the Electricity Industry Customer Transfer Code.	4	Obligations 31 to 34 CutlerMerz has interviewed key personnel from Meter Data Management, examined the Build Pack and other relevant documentation, and reviewed the procedures and processes in place for handling customer transfer requests. We determined the following: - The Build Pack contains information of the correct meters to be used in each situation, and the MBS automatically triggers for a meter change when the meter type does not align. - Western Power has rarely objected to a request to change a meter and only does so in the circumstances specified in 4.9(1) of the Electricity Industry Customer Transfer Code. - In the B2B system, a request with an invalid NMI gets rejected automatically. - If a request is rejected, the retailer is notified with an explanation and information consistent with clause 4.9(3) automatically through the MBS and Metering Service Centre. - Western Power receives 5-10% CTRs from a population of 30,000 contestable customers per year..	A	1
32.	A network operator must not object to a customer transfer request otherwise than in accordance with clause 4.9(1) of the Electricity Industry Customer Transfer Code.	4		A	1
33.	A network operator that objects to a customer transfer request must give to a retailer an electronic notice that includes the specified information within the timeframe prescribed.	4		A	1
34.	A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			- When agreeing on a new nominated transfer date Western Power negotiates a new timeframe, the new date is placed into the meter data management system, then once it is been agreed there is an adjustment to the CTR date in the system and notification is automatically sent by email. Findings: CutlerMerz finds that Western Power has complied with these obligations in its facilitation of customer transfer requests, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.		
35.	A network operator must take certain action in accordance with a defined timetable following the receipt of a valid customer transfer request, subject to clauses 4.10(2) and 4.10(3) of the Electricity Industry Customer Transfer Code and using all reasonable endeavours to affect the transfer.	2	CutlerMerz has interviewed key personnel from Meter Data Management, conducted walkthroughs of the Metering Service Centre and Metering Business System (MBS), examined Western Power's compliance reports, and reviewed the procedures and processes in place for handling customer transfer requests. We determined the following: - Retailers are automatically notified of the nominated transfer date. - In the event that a network issue is preventing a requisite meter read to facilitate a customer transfer request, Metering field resources will organise fieldwork to rectify the issue. If there is instead a communications issue preventing the collection of meter data, Western Power's CTR resource will contact the field team to find a solution. In either case Western Power endeavours to complete this within two business days. - Western Power was not compliant over the previous audit period but has managed to comply with the obligation over this audit period. Western Power attributes this to several factors: - The rollout of AMI meters, roughly half of the meters are now remotely read AMI meters. The reduction in manually read meters also has reduced the burden on the field team. The rollout is scheduled to be completed by 30 June 2027. - A closer relationship with field teams and understanding timeframes; - Improvements in the prioritisation of work orders in the system. - A larger team, which helps with the manual exception processes; - Communications failures have reduced with increased network coverage and the rollout of AMI meters, the current communications network upgrade is scheduled to complete in June 2027. - Western Power is currently in the process of upgrading its handheld metering devices. Findings: CutlerMerz finds that Western Power has complied with the obligation in its processing of customer transfer requests and associated timeframes and using reasonable endeavours to affect the transfer, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
36.	A network operator must take certain action if it considers that it is unlikely to be able to meet its obligations under clause 4.10(1) of the Electricity Industry Customer Transfer Code within the defined timetable.	4	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's compliance reports, and reviewed the procedures and processes in place for handling customer transfer requests. We determined the following: - Western Power endeavours to and has a work prioritisation system to aid with completing all CTRs on the nominated transfer date. - Automatically creates a service order request to the Metering field resource for a final meter read for the nominated transfer date, and this is sent to the relevant work group for planning. - Western Power investigates the cause of the delay, and the majority of these are an inability to access the meter, or communication faults. - Western Power electronically notifies the retailer of the reasons for being unable to complete a meter read on the nominated transfer date. - Western Power then liaises with the retailer to agree to a revised transfer date. - The retailer is automatically notified of the revised transfer date. Findings: CutlerMerz finds that Western Power has complied with this obligation in facilitating customer transfers within the specified timeframe, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
37.	In the specified circumstances, a network operator must within one business day of the receipt of the customer transfer request electronically notify the retailer of the most likely connection points that are related to the customer transfer request, up to a maximum of 10.	4	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's compliance reports, and reviewed the procedures and processes in place for handling customer transfer requests. We determined the following: - Through Western Power's NMI Discovery, the MBS is able to provide the most likely connection points based on location information up to a maximum of 10. - the NMI Discovery process requires the retailer to enter an address, but includes other location related fields. - The retailer will, in the vast majority of circumstances be able to provide an NMI. As such it is rare that a retailer needs to use NMI Discovery. Findings: CutlerMerz finds that Western Power's NMI Discovery process is compliant with this obligation, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
38.	A transfer may only occur on a day on which an actual value is obtained from the contestable customer's meter.	4	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's compliance reports, and reviewed the procedures and processes in place for handling customer transfer requests. We determined the following: - Once a valid CTR has been received, a meter read is automatically scheduled by the MBS to occur on the nominated transfer date and a work order is created. - The transfer is automatically processed in the MBS once the meter read has been recorded. - For the transfer to take place it need readings up until the transfer date to be an actual and not an estimated reading. - The readings themselves have a quality flag in the MBS to determine whether they're estimated or actual. Findings: CutlerMerz finds that Western Power has complied with the obligation in its processing of customer transfer requests and associated timeframes, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
39.	A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.	2	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's compliance reports, and reviewed the procedures and processes in place for handling customer transfer requests. We determined the following: - If it is not possible for the meter to be read on the nominated transfer date Western Power liaises with the incoming retailer within one business day to arrange a new transfer date. - There is a dedicated email inbox that is solely for customer transfers. - Senior Customer Relations Representative is responsible in the event of escalation. - Over the previous audit period Western Power was not compliant but it has since managed to achieve compliance over this audit period, and this is due to Western Power being compliant with obligation 35 above. Findings: CutlerMerz finds that Western Power has complied with the obligation in its processing of customer transfer requests and associated timeframes, and that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
40.	The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.	5	CutlerMerz has interviewed key personnel from Customer Relations and Meter Data Management, and conducted a walkthrough of Western Power's Metering Business System (MBS). We determined the following: - Western Power facilitates and executes the customer transfer, which includes the associated amendment to the access contract. - Western Power effectively receives a market notification from the incoming party and the incumbent receives a market transaction, Western Power facilitates and AEMO receives a standing data notification with the NMI of the connection point. - Western Power negotiates in good faith when it is inhibited by factors outside of its control, such as access to the meter. In this scenario the Metering Services team will contact the customer and notify them that the final meter read cannot be performed on the nominated transfer date and negotiate a new date. Findings: CutlerMerz finds that Western Power has complied with this obligation in its facilitation and execution of customer transfers, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
41.	A network operator must, within two business days after the transfer date, give an electronic notice of the transfer and the transfer date to the incoming retailer, the previous retailer and, if applicable, AEMO.	2	CutlerMerz has interviewed key personnel from Meter Data Management, conducted a walkthrough of Western Power's Metering Business System (MBS) and examined PowerBI dashboards that link to the MBS. We determined the following: - Western Power electronically notifies incoming retailers, previous retailers, and the AEMO of the transfer date once the transfer has been completed. - Western Power regularly shares data on contestable customers with and at the request of AEMO and has not had disputes with AEMO on this, but have had disputes with AEMO surrounding data of non-contestable customers under the Metering Code, but not the Customer Transfer Code. - Western Power uses COGNOS as its online portal, which shows CTR reporting and provides an overall summary of compliance. Compliance is summarized by retailer, providing visibility on total compliant and non-compliant completed CTRs.	B	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			- Western Power reported non-compliance incidences in its FY2021, FY2022 and FY2023 Annual Compliance Reports. - The primary cause of non-compliance is a delay between when the meter reading occurs and the time that the meter reading is uploaded into MBS. For manually read meters, the delay is caused when meter readers do not upload the data within the required timeframe. For remotely read meters, the delay can be caused by a communication failure. Once the final meter reading is uploaded to MBS, the retailer notification process is automated. - In FY2021 Western Power reported a rate of non-compliance was 2.95%, with ten retailers affected. This was primarily attributed to a back-log of meter exchange work impacted the loading of readings for newly installed meters and an increase in the number of manually read interval meters impacted on the availability of the contracted service provider. - In FY2022 Western Power reported a rate of non-compliance of 1.92%, with five retailers were affected. This was primarily attributed to the impact of Covid-19 both on internal resources available to Western Power, and also on the availability of third-party contract service providers, and the failure to obtain data on the first visit due to businesses being closed and not being able to access the meter. - In FY2023 Western Power reported a rate of non-compliance of 3.09%, with seven retailers were affected. This was primarily attributed to late meter readings for manually read interval meters, delays in field maintenance where communication devices fail to provide readings for customer transfers, and bulk transfer notification processes where a small subset are non-compliant. - In response to the non-compliance, Western Power has implemented the following measures to improve its performance: - Western Power is continuing with the planned rollout of remotely read AMI meters. - Increasing the size of the team, which helps with the manual exception processes. - Implemented an incentive structure that more strongly encourages team members to perform manual reads. - Communications failures have reduced with increased network coverage and the rollout of advanced meters. The current communications network upgrade is scheduled to complete in June 2024. -Western Power is currently in the process of upgrading its handheld metering devices. Findings: CutlerMerz finds that Western Power has not complied with this obligation in its failure to meet the timeframes associated with provision of notice to retailers in the aftermath of a customer transfer. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 1/2023: CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[4]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.		

[4] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
42.	A network operator must, following a transfer, do all that is necessary to ensure that charges up to the transfer time are paid by, or charged to, the previous retailer and charges from the transfer time are paid by, or charged to, the incoming retailer.	4	CutlerMerz has interviewed key personnel from Customer Relations and Meter Data Management, and conducted a walkthrough of Western Power's Metering Business System (MBS). We determined the following: - Western Power facilitates and executes the customer transfer. - Western Power effectively receives a market notification from the incoming party and the incumbent receives a market transaction, this information is stored in the MBS. - The transfer will not close in the MBS until a full set of reads are performed on the nominated transfer date. - MBS provides meter data to both incoming and outgoing retailer at a day level as according to the metering code where the market and market participants determines the time of day where the new retailer ownership begins. Findings: CutlerMerz finds that Western Power has complied with this obligation in its facilitation and execution of customer transfers, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
43.	In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and, if applicable, AEMO) must act in good faith to ensure that the affected contestable customer has the same rights and obligations as if the erroneous transfer had not occurred.	5	CutlerMerz has interviewed key personnel from Meter Data We determined the following: - In the event of an erroneous transfer being flagged in the Metering Business System (MBS), a notification will be automatically sent to the applicable retailers showing the reason as being 'erroneous'. - As Western Power executes and facilitates the transfer and is not a retailer, Western Power completes its role in good faith by ensuring that erroneous transfers are reversed, which is primarily performed through the MBS. Findings: CutlerMerz finds that Western Power has complied with this obligation in acting in good faith to reverse erroneous transfers, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
48.	8-Jun-20: A network's communication rules apply in respect of data and information communication between the network operator and a retailer under this Code.	4	CutlerMerz has interviewed key personnel from Meter Data Management and examined Western Power's Communications Rules and Build Pack. We determined the following: - Data and information communications with retailers under the Customer Transfer Code are facilitated by Western Power's Metering Business System (MBS), which as stipulated in its Build Pack, is consistent with Western Power's Communications Rules. - The Build Pack and Communications Rules can be found on Western Power's website, and retailers are notified when changes are made. - All processes, when formed, must follow the Communications Rules where applicable. Findings: CutlerMerz finds that Western Power has complied with this obligation in its application of its communications rules in communication under the Customer Transfer Code, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
48A.	All notices must be in writing and delivered as described in subclauses 6.1(a)-(c).	4	CutlerMerz has interviewed key personnel from Meter Data Management and examined relevant communications. We determined the following: - Over the audit period, all notices under the Customer Transfer Code were received and returned by email. - If a notice were to be received via post, the notification would be referred from the Customer Service Team to the Metering Team. Findings: CutlerMerz finds that Western Power has complied with this obligation in providing for all notices to be delivered in writing, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
49.	A licensee's notice in relation to a data request or customer transfer request must identify the connection point to which it relates.	4	CutlerMerz has interviewed key personnel from Meter Data Management and examined relevant communications. We determined the following: - Notifications in relation to data and customer transfer requests are generated automatically by Western Power's MBS. - The notifications provide the connection point's NMI as well as other information depending on the type of request. Findings: CutlerMerz finds that Western Power has complied with this obligation in identifying the relevant connection point in its notices relating to data and customer transfer requests, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
50.	A network operator must make reasonable endeavours to ensure that a retailer can provide a notice by post, facsimile or electronic communication; and notify the retailer of a telephone number for voice communication.	5	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's website, and attempted to use Western Power's facsimile number. We determined the following: - Western Power provides for customers to contact them and provide notice through post, electronic communication and telephone. - Western Power's contact details are available and easily accessible through its website, and Western Power has controls to ensure that retailers are notified of a change in its contact details. - Western Power no longer officially maintains a facsimile number. There is still a reference to a facsimile number on its 'service request terms and conditions' page which does not work. Findings: CutlerMerz finds that Western Power has, in the strict interpretation of the obligation, not complied with this obligation in as it does not maintain a facsimile number for notices to be provided. We do, however believe that Western Power acts in the spirit of the obligation and it is otherwise compliant with this obligation and has strong controls associated with other aspects of this obligation. Given that the compliance implication was not considered in the decision to cease maintaining a facsimile number, we believe that Western Power's controls cannot be expected to as they stand, so far as reasonably practicable, ensure ongoing compliance with this obligation in the strictest sense. Recommendation 2/2023: CutlerMerz recommends that Western Power reinstate a facsimile number for notification purposes.	B	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
51.	A network operator must notify each retailer of its initial contact details, and any amended contact details at least three business days before the change takes effect.	4	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's communication rules. We determined the following: - Western Power did not amend its contact details over the audit period. - If a new retailer comes to market, it will need an ETAC (access contract) with Western Power. First it must apply for a licence, then apply to AEMO, then apply to Western Power for the ETAC. - For the retailer to achieve this, they must already know the contact details. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R
54.	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with the communication rules.	4	CutlerMerz has interviewed key personnel from Meter Data Management, conducted a walkthrough of the Metering Service Centre and examined Western Power's Communications Rules. We determined the following: - Western Power sends electronic communications via the Metering Service Centre, XML based B2B transactions or via email notifications as specified in its Communications Rules, depending on the nature of the notification and how the request was received. - B2B based communications can be used with retailers if their systems can accommodate them, and by their nature are always sent to the applicable address. - The Metering Service Centre is accessed through an account, and all communications through the Metering Service Centre are sent to the account as such. - A designated email address is used in the case of email communications. Findings: CutlerMerz finds that Western Power has complied with this obligation in sending required electronic communications to the applicable communication address and in accordance with the Communication Rules, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
55.	For a dispute in respect of a matter under, or in connection with, the Electricity Industry Customer Transfer Code, the disputing parties must meet, within five business days of a request by one of those parties, and attempt to resolve the dispute through negotiations that are conducted in good faith.	5	Obligations 55 to 59 CutlerMerz has interviewed key personnel from Customer Relations and reviewed Western Power's procedures surrounding disputes with Code participants. We determined the following: - Western Power has not entered into any disputes with any Code participants under the Customer Transfer Code over the audit period. - Western Power does not arbitrate between two retailers, and does not consider this a dispute as such. - Responsibility for managing such a dispute would sit between the Customer Relations and Meter Data Management teams. - Western Power endeavours to maintain a strong relationship with its retailers. Findings: CutlerMerz makes no findings as no activity occurred with respect to these obligations over the audit period.	N/P	N/R
56.	If the negotiations in 7.1(1) of the Electricity Industry Customer Transfer Code do not resolve the dispute within 10 days after the first meeting, the dispute must be referred to the senior executive officer of each disputing party who must attempt to resolve the dispute through negotiations that are conducted in good faith.	5		N/P	N/R
57.	If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.	4		N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
58.	A disputing party that refers a dispute to the arbitrator must provide the arbitrator with prescribed details of the nature of the dispute.	4		N/P	N/R
59.	A disputing party must, at all times, conduct itself in a manner that is directed towards achieving the objectives in clause 7.3(1) of the Electricity Industry Customer Transfer Code.	5		N/P	N/R
60.	A network operator's request for standing data form must require a retailer to provide certain information.	4	Obligations 60 to 61 CutlerMerz has interviewed key personnel from Regulatory Compliance and Meter Data Management, conducted a walkthrough of the Metering Service Centre, and examined Western Power's printable version of its request for standing and historical data forms, its head office, and other relevant documentation. We determined the following: - The principal method through which standing and historical data requests are made is through the online form which is available via Western Power's Metering Service Centre & Western Powers B2B XML System. - The online forms explicitly requires retailers to provide the requisite information specified in Annex 1 for the standing data form and Annex 2 for the historical data form, of the Electricity Industry Transfer Code. - Hard copies are made available at its principle places of business, and Western Power will print a hard copy for removal, on request and at no cost to the person in a timely fashion. - The online forms explicitly state that the NMI and the checksum are entered as a continuous number, but the printable version does not explicitly state this. - The forms were not amended during the audit period, and procedures surrounding amendments, which are stipulated in the Build Pack, outline controls that align with both the requirements of Annex 1 for the standing data form and Annex 2 for the historical data form, and Western Power's obligation to publish the forms. Findings: CutlerMerz finds that Western Power has complied with these obligations as its request for standing data and historical data forms require retailers to provide the information specified in Annexes 1 and 2 of the Electricity Industry Customer Transfer Code respectively, and it has met its obligation to publish the forms in the manner specified. CutlerMerz also finds that it is controls can be expected to ensure ongoing compliance but does identify an opportunity for improvement. The online form explicitly states that the NMI and checksum should be entered as a continuous number, but the printable version of the form does not explicitly state this. We propose that the printable version of the form be amended to explicitly state this.	A	1
61.	A network operator's request for historical consumption data form must require a retailer to provide certain information.	4		A	1
62.	A network operator's customer transfer request form must require a retailer to provide certain information.	4	Refer to findings under obligation 22	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
63.	A network operator must provide certain information, if available, to a retailer that submits a request for standing data.	4	CutlerMerz has interviewed key personnel from Meter Data Management and examined samples of standing data provided in response to valid requests. We determined the following: Requests for standing data made and responded to through the B2B system and Metering Service Centre & Western Powers B2B XML System. - Western Power provides the information specified in Annex 4 clause A4.1 of the Electricity Industry Customer Transfer Code in response to valid requests. Findings: CutlerMerz finds that Western Power has complied with this obligation in its provision of standing data, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
64.	A network operator must provide certain metering data, if available, in a prescribed manner to a retailer who submits a request for historical consumption data.	4	CutlerMerz has interviewed key personnel from Meter Data Management and examined samples of historical consumption data provided in response to valid requests. We determined the following: Requests for standing data made and responded to through the B2B system and Metering Service Centre. - Western Power's MBS provides interval data up to a minimum of 12 months if it is available, and provides accumulation data otherwise. Findings: CutlerMerz finds that Western Power has complied with this obligation in its provision of historical consumption data, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
65.	A network operator must respond to a request from a retailer for a NMI and checksum for a connection point within one business day of receiving the request.	4	Obligations 65 to 67 CutlerMerz has interviewed key personnel from Meter Data Management and conducted a walkthrough of the Metering Service Centre portal. We determined the following: - The NMI Discovery Function in the Metering Service Centre allows a Retailer to search for a NMI and a checksum using a site address or meter number. This is processed immediately. - AEMO has a separate automated process to provide checksums, which Western Power checks against their checksum. - The matching process in the NMI Discovery function first checks for an exact match, and if it finds one it will only output the exact match, the NMI Discovery function does not provide more than 99 matches. Findings: CutlerMerz finds that Western Power has complied with these obligations in its provision of a NMI and checksum on request, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
66.	If a network operator, following a request from a retailer, cannot provide a single NMI and checksum for a connection point, it must provide the retailer with the most likely matches, up to a maximum of 99.	4		A	1
67.	If a network operator, following a request from a retailer, can provide a single NMI and checksum for a connection point, it must do so, unless otherwise advised by the retailer.	4		A	1
10 Electricity Industry (Obligation to Connect) Regulations – Licence Conditions and Obligations					
72.	A distributor must attach, or connect, premises to a distribution system or provide a stand-alone power system for the supply of electricity to the premises if a retailer seeks to arrange with, or a customer applies to, the distributor to attach or connect the premises. The circumstances described in regulation 5(1) must be met for the distributor to be required to attach or connect the premises.	4	Obligations 72 to 73 CutlerMerz has interviewed key personnel from Distribution Delivery and SPS Delivery, conducted a walkthrough of the DQM, reviewed associated procedures and processes, and examined relevant documentation. We determined the following: - Applications are received through the customer connection services team, typically through the website, such customers are often regional. - There is an automated email response to acknowledge receipt upon an application.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
73.	A distributor that decides to attach, or connect, premises to the distribution system to satisfy the obligation under regulation 4 must extend the distribution system to a suitable connection point.	4	- With regard to stand-alone power systems, the design is based on what Western Power deems a 'minimal practical asset approach', which allows for consideration of future load. - To determine suitability of a connection point, Western Power conducts a detailed site survey, the factors include but are not limited to the propensity for flooding and agricultural usage. A connection point needs to be located in an area that is out of the way. - An O2C (obligation to connect) job is created in the DQM system to be actioned by the field crew, who then liaises with the customer. - Customers are connected in all instances where the extension to the distribution system is less than 100 metres. Findings: CutlerMerz finds that Western Power has complied with these obligations in extending a distribution systems under the prescribed circumstances and to a suitable connection point, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
74.	The capacity and standard of an extension or a stand-alone power system must be adequate for the supply required and in accordance with accepted good industry practice as would be applied by a prudent distributor.	4	CutlerMerz has interviewed key personnel from Distribution Delivery and SPS Delivery, examined Western Power's Design Instruction Manual, and conducted a walkthrough of the DQM. We determined the following: - The obligation to connect relates to guarantee 'standard supply', which is written into the Western Australian Services and Installation Requirements (WA SIR). Western Power's practices in both extension and provision of stand-alone power systems are consistent with these requirements, as well as its Design Instruction Manual and other Australian standards. - In some cases transformers become overloaded for a given application as the load increases but still continue to operate. In this circumstance Western Power applies a 'Run to Failure' strategy, after which it is replaced with a larger transformer. We consider this to be consistent with accepted good industry practice. - Project applications are made through a form available on the website which is received by the 'New Business and Works' team, which then gets entered into Western Power's DQM system as an 'O2C' job. There is a 'simple design team' that validates the application and determines if further design work is required, in which case it gets referred to the design team. After the design phase the bulk of the work is contracted through the delivery team - From a design perspective, for a particular load, Western Power assesses the capacity (based on feeder capacity) to see if it seems reasonable as per the 'Design Instruction Manual' and relevant Australian standards. - As part of the process, a site inspection is performed with the customer after which a report is created. - Western Power provides three sizes of stand-alone power systems: 63, 80, and 100amp. The size of which is determined using a 'lifecycle cost approach', to account for likely future increases in cost. Findings: CutlerMerz finds that Western Power has complied with these obligations in ensuring that the capacity and standards of extensions and stand-along power systems are adequate for the supply required and in accordance with accepted good industry practice as would be applied by a prudent distributor. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
75.	A distributor that decides to attach, or connect, premises to the distribution system to satisfy the obligation under regulation 4 must do so within a defined timeframe.	4	CutlerMerz has interviewed key personnel from Distribution Delivery, SPS Delivery, New Business & Works and in-field personnel responsible for connection work, conducted a walkthrough of the DQM, examined documentation of the admin process surrounding 'O2C' jobs, the relevant Standard Operating Procedure document and relevant communications. We determined the following: - Western Power was not compliant over the audit period. It reported in its FY2023 Annual Compliance Report to the ERA that 7 of 78 (8.97%) of obligation to connect projects in FY2023, and 3 of 48 in FY2022 were not completed within timeframes agreed with the customer. This is due to the same reasons for non-compliance listed under obligation 77. - Western Power was compliant in FY2021, in part due to the low volume of obligation to connect projects during the Covid-19 pandemic. There were 12 obligation projects throughout the FY2021. - There have been less than five applicable deployments of stand-alone power systems over the audit period, and Western Power endeavours to meet the defined timeframes through engagement with customers to agree to conservative timeframes. - Applications are received online or through the customer service centre, and in either case the customer is advised as to the likely timeframe, cost, and scope, prior to payment and acceptance via email. - After this the entire job is managed through the DQM, including jobs which have been contracted out. - The work is typically outsourced if the connection is to an existing connection. Underground work is also typically outsourced. - When the network is extended a bespoke design is required. - In some cases, Western Power will be delayed when the customer does not provide access and will put the job on hold until they get access, but these circumstances are not breaches of compliance due to Regulation 5(a) of the Electricity Industry Obligation to Connect Regulations, which requires the customer to provide access. - Field crews are notified of a required in-service date. Despite this, field crews interviewed at the regional Northam Depot stated that they generally targeted a 13-week timeframe in all circumstances did not demonstrate awareness of required in-service dates with reference to O2C jobs. Field crews do, however, communicate these connection timeframes with the customer. Findings: CutlerMerz finds that Western Power has not complied with this obligation in meeting the defined timeframes for performing connections. Given the nature of the non-compliances, we find that if may not be realistic or practicable to maintain 100% compliance. We do, however, find that Western Power's procedures to ensure that timeframes are understood by the field crews may be inadequate to, so far as reasonably practicable, ensure compliance. Recommendation 3/2023: CutlerMerz recommends that Western Power implement systems or procedures to ensure that timeframes are understood by the field crews responsible for connections and that extensions to the network and stand-alone power systems are delivered within the timeframes agreed by the customer in writing.	B	2
76.	A distributor must energise premises in certain prescribed circumstances.	4	CutlerMerz has interviewed key personnel from New Business & Works and conducted a walkthrough of the DQM. We determined that requests for energisation are made through the B2B system by Synergy, which are translated into a work order through the DQM, and that all customers need an account with Synergy to be energised. Findings: CutlerMerz finds that Western Power has complied with this obligation in energising premises at the request of a retailer, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
77.	A distributor that is obliged to energise premises must do so within a defined timetable.	2	CutlerMerz has interviewed key personnel from Distribution Delivery, SPS Delivery and New Business & Works, conducted a walkthrough of the DQM, and reviewed associated procedures and processes. We determined the following: - Western Power disclosed in its Annual Compliance Report to the ERA that it did not comply with this obligation, reporting that 0.23%, 0.21% and 0.16%, in FY2021, FY2022 and FY2023 respectfully, of re-energisations were not completed in the defined timeframe. - The majority of these were due to delays in crews attending energisations as emergency work such as bushfire and storm repairs and technical issues being identified which requires specialist crews were taking priority. - In the majority of cases, the defined timeframe was not exceeded by 24 hours. - Once an energisation request is received it is translated into a work order through the DQM, which is referred to the field crew and shows the SLA timeframe. - Affected sites were individually case managed to ensure that they were reconnected as soon as practicable. - Western Power maintains effective procedures to monitor its compliance with this obligation, including but not limited to a monthly report of re-energisation service orders that are non-compliant or do not reach the SLAs. Findings: CutlerMerz finds that Western Power has, as disclosed in its Annual Compliance Reports to the ERA, not complied with this obligation in meeting the defined timeframes for performing re-energisations. Given the nature of the non-compliances, we find that if may not be realistic or practicable to maintain 100% compliance, and given this, we find that its controls can be expected to, so far as reasonably practicable, ensure compliance.	A	2
77A.	A distributor that proposes to decommission a distribution system or a part of a distribution system must notify: · the owner of each premises attached to the distribution system or part; and · the owner of each premises in relation to which the requirement in sub regulation 5(1)(a) is satisfied in relation to the distribution system or part.	3	CutlerMerz has interviewed key personnel from Distribution Delivery and SPS Delivery, examined sample communications, and reviewed associated procedures and processes. We determined the following: - Western Power notifies all customers to be affected that lines are going to be disconnected by letter. - Western Power has conducted few decommissioning projects. The SPS program has been the first large initiative involving disconnections. Findings: CutlerMerz finds that Western Power has complied with this obligation in notifying the affected owners of a decommissioning of a distribution system, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
11 Electricity Industry (Customer Contracts) Regulations – Licence Conditions and Obligations					
99.	The distributor must determine, from time to time, the default supplier for each connection point that connects to a distribution system operated by the licensee (distributor).	4	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's compliance reports, and reviewed the procedures and processes in place for handling customer transfer requests. We determined that Synergy is the default supplier for all connection points that connects to Western Power's distribution system. In the meter data management system Synergy is the retailer of last resort, Synergy being the franchise customer. Findings: CutlerMerz finds that Western Power has complied with this obligation in having determined that Synergy is the default supplier for all connection points connected to its distribution system, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
12 Electricity Industry Act - Licence Conditions and Obligations					
101.	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 (or any longer period that the ERA allows).	4	CutlerMerz has interviewed key personnel from Regulatory Compliance, examined the ERA's and Western Power's websites, and examined documentation of prior performance audits and other relevant communications and documentation. We determined the following: - The prior performance audit for Western Power's Licences was conducted by Assurance Advisory Group in 2020, with a final report submitted to the ERA in November 2023. - With the ERA's approval, CutlerMerz was appointed to undertake the 2023 Performance Audit for the period 1 July 2020 to 30 June 2023. - There has not been a requirement from the ERA to provide another interim performance audit during the audit period. Findings: CutlerMerz finds that Western Power has complied with this obligation under the Electricity Industry Act in providing the ERA with performance audits conducted by independent experts approved by the ERA not less than the period specified by the ERA, 36 months. CutlerMerz also finds that it is controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
102.	A licensee must provide for an asset management system.	4	Obligations 102 to 103 CutlerMerz has interviewed key personnel from Regulatory Compliance, and examined Western Power's Asset Management System Description. We determined that Western Power provides for an asset management system and that the last substantial changes made were in 2010, and as such, Western Power has not been required to notify the details of its asset management system during the audit period. Findings: CutlerMerz finds that Western Power has complied with obligation 102 in providing for an asset management system, and find that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance. As no activity has occurred with respect to obligation 103, compliance with respect to that obligation has not been assessed, nor has an assessment been made of the associated controls.	A	1
103.	A licensee must notify details of the asset management system and any substantial changes to it to the ERA.	4		N/P	N/R
104.	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.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance and examined the ERA's website and previous Asset Management System Review Report, and relevant communications. We have determined the following: - The previous asset management system review for Western Power's Licences was conducted by AMCL in 2020, with a final report submitted to the ERA in September 2020. - There has not been a requirement from the ERA to provide another asset management system review during the audit period, and that due to its high level of compliance with respect to this matter, was given four years between the last and next audit. Findings: CutlerMerz finds that Western Power has complied with this obligation under the Electricity Industry Act in providing the ERA with its last asset management system review in 2020 conducted by independent experts approved by the ERA not less than the period specified by the ERA, 48 months. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
105.	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.	2	CutlerMerz has interviewed key personnel from Regulatory Compliance and examined relevant invoices and sample communications from over the audit period. We have determined that Western Power has paid the prescribed licence fees by the due date and that Western Power implemented the tracking of payment of invoices by the Regulatory Compliance Team and adjustment to its payment speed for ERA invoices in response to a prior non-compliance. Findings: CutlerMerz finds that Western Power has complied with this obligation in its payment of its licence fees to the ERA, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
106.	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.	5	CutlerMerz has interviewed key personnel from Network Control and examined relevant Standard Operating Procedure documents. We determined the following: - Western Power's eNAR system guides field personnel and requires them to enter fields as they conduct fieldwork. - The eNAR system requires the originator of the outage request to consider whether mobile generation is required based on relevant risk and practicality factors. - Once the eNAR request has been completed including any determination if alternative means of supply is required, the Outage Notification & Evidence (ONE) system will automatically notify affected customers. Where customers are registered with LSE requirements, Western Power will contact them to acknowledge receipt of the notification. - PowerOn Advantage is Western Power's complete distribution management system supplied by General Electric. - It includes a call taker, a front end management system for call centre. - Most calls are created by a Call Taker in the Customer Contact Centre using the Call Taker application, which uses a sequence of questions called to triage the incident, identify the correct call category, and collect further information about the incident. - PoA also raises some types of incidents automatically when it detects incidents on the network through Western Power's SCADA monitoring system. - Once an incident is created, it is presented to a Dispatcher electronically. The Dispatcher can then dispatch the incident to a field crew electronically via the Mobile application or over the phone. - A priority is assigned for an incident based on criteria outlined in Western Power's standard operating procedure documents. - The dispatch rules apply 24 hours a day, seven days a week. Findings: CutlerMerz finds that Western Power has complied with this obligation in taking reasonable steps to minimise the extent and duration of interruptions, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
107.	A licensee must pay the costs of taking an interest in land or an easement over land.	4	CutlerMerz has interviewed key personnel from Property and Fleet. We determined that Western Power does not secure interests in land via this Act, but through the Energy Operators (Powers) Act 1979 (s.45), and in the case of compulsory taking (resumption) pursuant to Part 9 of the Land Administration Act 1997	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
111.	A retail, distribution or integrated regional licensee must not supply electricity to small use customers unless the licensee is a member of an approved scheme and is bound by, and compliant, with any decision or direction of the electricity ombudsman under the approved scheme.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance, and examined relevant communications and invoices. We determined the following: - Western Power is a member of the Energy and Water Ombudsman Scheme, has been for a long time, and has paid its membership fees over the audit period. - Western Power is not a member of any other schemes. - Western Power does not supply electricity to small use customers outside of this approved scheme. - The communications and invoices examined show that Western Power has paid the associated membership fees. Findings: CutlerMerz finds that Western Power has complied with this obligation in not supplying electricity to small use customers outside of an approved scheme, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
13 Electricity Licences – Licence Conditions and Obligations					
119.	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.	4	CutlerMerz has interviewed key personnel from Financial Accounting, and examined Western Power's annual statutory accounts, signed independent auditor's reports from the Office of the Auditor General, and Financial Management Policy. Findings: CutlerMerz finds that Western Power maintained accounting records in compliance with Australian Accounting Standards and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
120.	A licensee must comply with any individual performance standards prescribed by the ERA.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance, reviewed the procedures and processes in place to respond to the ERA's information requests, and examined Western Power's compliance reports. We determined the following: - Western Power has never been prescribed individual performance standards as additional terms and conditions to its ETL1 or ETL2 licenses by the ERA. - It has been prescribed specific obligations under the Electricity Industry Network Quality and Reliability of Supply Code, but this is outside the scope of this obligation. - Responsibility for oversight sits with Regulation and Investment Assurance. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R
121.	A licensee must comply, and require its auditor to comply, with the ERA's standard audit guidelines for a performance audit.	4	The 2020 performance audit conducted during the period July to November 2020 complied with the 2019 version of the ERA's Audit Guidelines. Western Power has instructed CutlerMerz to comply with the 2019 issue of the ERA's Audit and Review Guidelines: Electricity and Gas Licences (August 2022). The approved 2023 performance audit plan makes specific reference to those Guidelines. Through interviewing the Regulatory Compliance team responsible for regulatory compliance and examining Western Power and the ERA's websites, we have determined that there has been no other performance audit during the audit period. Findings: CutlerMerz finds that Western Power has complied and required its auditors to comply with the ERA's standard audit guidelines for its performance audits, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
122.	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.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance and examined the ERA's website and previous Asset Management System Review Report, and relevant communications. We have determined the following: - The previous asset management system review for Western Power's Licences was conducted by AMCL in 2020, with a final report submitted to the ERA in September 2020. - There has not been a requirement from the ERA to provide another asset management system review during the audit period, and that due to its high level of compliance with respect to this matter, was given four years between the last and next audit. Findings: CutlerMerz finds that Western Power has complied with this obligation in providing the ERA with its last asset management system review in 2020 conducted by independent experts approved by the ERA, which complied with the ERA's standards audit guidelines for an asset management system review, of which the review plan and report were approved by the ERA. We also find that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
123.	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.	4	CutlerMerz has interviewed key personnel from regulatory compliance and conducted desktop research. We determined that during the period 1 July 2020 and 30 June 2023, Western Power was not under external administration and there were no significant changes affecting Western Power's ability to meet its obligations. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R
124.	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.	2	CutlerMerz has interviewed key personnel from Regulatory Compliance, reviewed the procedures and processes in place to respond to the ERA's information requests, and examined Western Power's compliance reports and sample communications with the ERA. We have determined the following: - Western Power reported non-compliances in both its FY2021 and FY2022 Annual Compliance Reports. - In FY2021 the calculations used by Western Power on Normalised Distribution Network data reported for the 2019/20 financial year excluded the impact of Force Majeure events. - In FY2022 the calculations used by Western Power on Normalised Distribution Network reliability data reported for the 2020/21 financial year excluded the impact of Transmission outage events on consumers. - Neither exclusion is allowable under the Electricity Distribution Licence Performance Reporting Handbook (the Handbook), and the non-compliance was due to an incorrect interpretation of the Handbook. - Western Power has ceased to make these exclusions, in accordance with the Handbook. - Western Power submits the datasheets as required and has over the audit period, provided all within the requisite timeframes. - Upon request and outlook item is scheduled and the progress of the task is monitored. - The manager reviews the information prior to provision to the ERA. - Western Power is asked to report its line length to the ERA on an annual basis, which is used to calculate its fee. - In response to the non-compliance in the previous audit period surrounding timeframes due to oversight, Western Power implemented its Financial Year Reporting Timetable, Checklists & Instructions to better track key due dates.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			CutlerMerz finds that Western Power, as reported in its Annual Compliance Reports, has not complied with this obligation over the audit period. We note that the non-compliance was due to an incorrect interpretation of the Electricity Distribution Licence Performance Reporting Handbook (the Handbook). We acknowledge that it may not be practicable for Western Power to at all times guarantee the correct interpretation of the Handbook, and find that its controls can be expected to, so far as reasonably practicable, ensure compliance.		
125.	A licensee must publish any information as directed by the ERA to publish, within the timeframes specified.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance, reviewed the procedures and processes in place to respond to the ERA's information requests, and examined Western Power's datasheets and associated communications, and Western Power's compliance reports. We have determined the following: - Western Power published datasheets as requested by, and by the due date set by, the ERA. - The Regulatory Compliance Manager is responsible and the primary contact for the ERA's compliance related requests. - The Regulatory Compliance Manager schedules an outlook item upon request, monitors progress, and reviews prior to provision to the ERA. - Western Power has not been asked by the ERA to publish confidential information, as such, Western Power has never needed to notify the ERA and seek review. Findings: CutlerMerz finds that Western Power has complied with this obligation in published datasheets as requested by, and by the due date set by, the ERA, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
126.	All notices must be in writing, unless otherwise specified.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance and sample notifications. We have determined the following: - Western Power formally provides and responds to all notices in writing. - The relationship with the ERA is managed by the RIA team. - The ERA and the Safety Regulator write directly to the CEO of Western Power and the flow of communications from there is a formal process. Findings: CutlerMerz finds that Western Power has complied with this obligation in providing all formal notices in writing, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating

127.	A distributor must create and maintain a Priority Restoration Register.	2	CutlerMerz has interviewed key personnel from Network Operations Development and examined documentation of Western Power's PowerOn Advantage distribution management system as it relates to incident management and the call taker wizard, and other relevant documentation.
			
			We determined the following:
			- PowerOn Advantage is Western Power's complete distribution management system supplied by General Electric, it performs all the functions of a Priority Restoration Register.
			- It includes a call taker, a front end management system for call centre.
			- Dispatchers list the priority, and work is electronically dispatched.
			- Most calls are created by a Call Taker in the Customer Contact Centre using the Call Taker application, which uses a sequence of questions called to triage the incident, identify the correct call category, and collect further information about the incident.
			- PoA also raises some types of incidents automatically when it detects incidents on the network through Western Power's SCADA monitoring system.
			- Once an incident is created, it is presented to a Dispatcher electronically. The Dispatcher can then dispatch the incident to a field crew electronically via the Mobile application or over the phone.
			- The Dispatcher must place the incidents in one of the following queues based on the information from the field as it is managed:
			  - SFW (Special Follow Up Work)
			  - IRG (Incident Response Group)
			  - IRGP (Incident Response Group Parked).
			- A priority is assigned when an incident is moved from IRG to IRGP based on criteria outlined in Western Power's standard operating procedure documents.
			- The dispatch rules apply 24 hours a day, seven days a week.
			- Once dispatched, field workers can see which incident is pertinent to them, close down the job when completed, and put in comments.
			
			Findings: CutlerMerz finds that Western Power has complied with this obligation in operating and maintaining its PowerOn Advantage system which serves as its priority restoration register, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.
				A	1

128.	The Priority Restoration Register must comply with any criteria determined by the Minister.	2	CutlerMerz has interviewed key personnel from Network Operations Development. We determined that the Minister had not prescribed any specific criteria regarding the Priority Restoration Register during the audit period. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
14 Code of Conduct – Licence Conditions and Obligations					
Disconnection & Interruptions					
233.	3-Jan-23 CRM: A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24- hour emergency line and use its best endeavours to restore supply as soon as possible.	4	CutlerMerz has interviewed key personnel from the Customer Service Centre, and examined Western Power's Annual Compliance Reports, relevant Standard Operating Procedure documents, and its Prioritising Network Restoration Guideline. We determined the following: - Western Power reported a non-compliance in its FY2021 Annual Compliance Report, having been compliant in the previous audit period and in other years during the audit period. - The non-compliance was due to a gateway router fault, which caused the 24-hour emergency line to become unavailable for approximately 30 minutes. - In response to the non-compliance, a backup plan (Kytec Call Mapping) was implemented for when calls cannot be delivered to the standard phone system. The Customer Service Centre team manually implements a bypass to an alternative number (via Kytec), which plays an emergency message directing people to call 000 if they are calling about a life-threatening emergency (LTE). - The vXML router responsible for the issues encountered in April 2021 was changed to a monitored service. Should the equipment fail, an automated alert will be raised with Western Power Service desk. The detail is recorded in Service Now. - Additional new solutions are being investigated as part of current system upgrades. - Restoration work is prioritised in Western Power's PowerOn Advantage distribution management system, based on criteria outlined in Western Power's standard operating procedure documents. - Western Power uses mobile generators during unplanned outages to minimise the outage duration and customers affected. - The eNAR system discussed in further detail under obligation 465 enhances the field crew's ability to prioritise and reduce the duration of interruptions. - Western Power redeploys staff from other areas when necessary. Findings: CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its Annual Compliance Reports. We believe that the measures implemented in response to the non-compliance can be expected to, so far as reasonably practicable, ensure ongoing compliance. CutlerMerz makes no further recommendation with respect to this obligation.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
234.	Subject to subclause 52(3), a retailer or distributor must comply with the limitations specified in subclauses 52(1)-(2) when arranging for disconnection or disconnecting a customer's supply address.	2	CutlerMerz has interviewed key personnel from Meter Data Management and the Customer Service Centre, and examined documentation of Western Power's Customer Management System (CMS). We determined the following: - Western Power manually creates a case in the Customer Management System (CMS) for each complaint in a timely manner. - There is an automated process that creates a flag in the Metering Business System (MBS) for active complaints or Ombudsman cases in CMS. - De-energisations of connections with this flag are automatically cancelled in MBS. - IT has additional controls in place to ensure the complaints team is notified if the flag is not automatically identified in the MBS for complaints. - An email is sent to the team on a yearly basis to confirm their understanding of the process for complaints relating to a disconnection. Findings: CutlerMerz finds that Western Power has complied with this obligation in complying with the limitations specified in the Electricity Industry Code of Conduct when arranging de-energisations, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
237.	3-Jan-23 CRM: The distributor must comply with subclauses 7.7(3)(a)-(b) if a distributor has been informed by a retailer under subclause 7.7(1)(c), or by a relevant government agency, that a person residing at a customer's supply address requires life support equipment, or of a change of details notified to the retailer under subclause 7.7(2).	2	CutlerMerz has interviewed key personnel from Network Operational Systems, conducted sample testing of notifications and updates to the Life Support Register, and reviewed the procedures and processes in place for maintaining records of life support equipment addresses. We have determined the following: - Supply addresses are automatically added and removed from the Life Support Register, which is a component of Western Power's Customer Management System (CMS), there is a flag in the CMS system for life support addresses. - The automated process also conducts checks, each customer has a reference number and an associated checksum. - There are additional daily manual checks performed in excel for the register. The personnel responsible look at the notification that came in and perform a sum check on how many are on there, and how many were removed. This is in case of a problem with the IT system, there have been no system failures thus far. - There is a monthly check with Synergy. Synergy's current register is compared in its entirety to the Western Power register to determine any issues. Other retailers are asked to confirm registers bi-monthly. - There are timestamps for the data in a log that is kept on the automated system, timestamps are to the millisecond. - Western Power is informed through both email and its B2B gateway, depending on the arrangements with the retailer. - There have been no instances of a government agency informing Western Power directly that a person residing at a customer's supply address requires life support equipment, or a change of details over the audit period. Over the audit period, there have been instances of the department of finance informing a retailer that customers have joined the subsidy scheme, but this was indirectly through a retailer, and not to Western Power. - It takes approximately five minutes for the life support information to be updated in the system, the system performs a check every 5 minutes to poll whether there is available information. - On 22 March 2023, Western Power reported a non-compliance for obligation 297E, which requires Western Power to update the email address of life support customers notified by retailers.. This occurred after this obligation 237 was removed. - Western Power has implemented an interim solution to automatically extract the customer's email address from the retailer's notification and add it to its LSE register. - Western Power intends to implement a permanent solution that involves changing its systems for managing this information. This will require the agreement of retailers. Findings: CutlerMerz finds that Western Power has complied with this obligation in its maintenance of its life support equipment customer details from 1 July 2020 up to and including 19 February 2023. However, had this obligation continued to be in effect after 19 February 2023, we believe that Western Power would not have complied with this obligation in March 2023 in relation to updating the email addresses of LSE customers. Since 19 February 2023, the requirement to update LSE customer details within obligation 237 were superseded by obligation 297E. A finding of non-compliance and associated recommendation has been made against obligation 297E.	B	1
238.	3-Jan-23 CRM: If life support equipment is registered at a customers' supply address under subclause 7.7(3)(a), a distributor must comply with subclauses 7.7(4)(a) and (b).	2	Obligations 238 to 239 CutlerMerz has interviewed key personnel from Meter Data Management and Network Project Delivery, reviewed Western Power's procedures surrounding de-energisations, conducted a walkthrough of the Metering Business System (MBS), and examined documentation of its Outage Notification and Evidence (ONE) system, its internal audits on the planned interruptions process, and an extract from the ONE system containing the	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
238A.	3-Jan-23 CRM: A distributor must use best endeavours to contact the customer, or someone residing at the supply address, prior to an interruption to restore supply to a supply address that is registered as a life support equipment address.	5	details of all planned outages (including the date of notification and of the outage) that affected LSE addresses and other supporting evidence. We determined the following: Disconnections - If a retailer creates a request for de-energisation for failure to pay a bill on an account that already has a life support flag from the retailer in the system, it automatically cancels the request. The team that handles disconnections also receives an automated report to make sure that no field team receives the job. - If a new LSE customer has been registered to a supply address with an active de-energisation service order the field officer receives a notification. Planned Interruptions - To provide at least three business days' notice of planned interruptions to LSE addresses, Western Power sends a notification to the supply address or another nominated address 10 days prior to the planned interruption, and uses best endeavours to obtain acknowledgement of receipt of the notification, unless the LSE customer has opted out of being contacted. On the day of the planned interruption, a field officer performs a door knock on the LSE supply address. - In this context, Western Power's approach to 'best endeavours' for contacting the customer is to attempt 3 phone calls, at least 4 hours apart, over 2 days. - Western Power's automated ONE system (Outage Notification and Evidence) performs a sweep to determine if any new LSE customers are in the planned interruption area between day 10 and day 1. - In the case of an interruption to restore supply to a supply address that is registered as a LSE address, Western Power makes best endeavours to notify the LSE customer. - The LSE register is reviewed prior to performing a planned outage to capture any new LSE customers registered. - An output from the ONE system with the details of all planned outages and related evidence reflected showed that someone residing at all LSE addresses affected by a planned outage during the audit period were notified at least three business days prior. This includes 2407 eNAR planned outage work orders and 2109 unique addresses. Findings: CutlerMerz finds that Western Power has complied with these obligations in not disconnecting LSE addresses for failure to pay a bill and in its provision of notice, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
239.	3-Jan-23 CRM: If a distributor has already provided notice of a planned interruption that will affect a supply address, prior to the distributor registering a customer's supply address as a life support equipment address, the distributor must use best endeavours to contact that customer or someone residing at the supply address prior to the planned interruption.	5		A	1
241.	3-Jan-23 CRM: A retailer or a distributor must remove the customers' details from the life support equipment register in the circumstances and timeframes specified in subclause 7.7(7).	4	Refer to findings under obligation 297M	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
Reconnection					
244.	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 54(4), if the circumstances specified in subclause 54 (1) apply.	1*	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's compliance reports, conducted a walkthrough of the MBS, reviewed the procedures and processes in place for managing re-energisations, and examined Western Power's PowerBI dashboard that links directly to the metering business system (MBS) and its Annual Compliance Reports. We determined the following: - Western Power reported instances of non-compliance in its FY2021, FY2022 and FY2023 Annual Compliance Reports. These were primarily the result of inability to obtain access to a site and site safety concerns (typically dogs, aggressive customers, insulation issues and locked gates), and the need for specialised field resources due to the circumstances of the site which resulted in delays when these staff were not immediately available. In some circumstances in FY2021 and FY2022 Covid-19 vaccination requirements and closed borders also reduced the availability of field resources. - Western Power's PowerBI dashboard that links directly to the metering business system (MBS) revealed that it also had instances of non-compliance in FY2023, also primarily due to site access issues. - The affected sites were individually case managed to ensure they were reconnected as soon as practicable. - In FY2020 the rate of non-compliance was 0.75%, which reduced to 0.49% in FY2021 and 0.17% in FY2023. - The improvement in the rate of compliance is primarily attributed to the rollout of AMI meters which are remotely connected and disconnected. Roughly half of Western Power's meters are now AMI meters, and the rollout is scheduled to conclude by the end of FY2027. - Requests for re-energisation are received by Western Power from the retailer via a service order in MBS, this automatically schedules a work order to a field officer. Findings: CutlerMerz finds that Western Power has not complied with this obligation in meeting the specified timeframes for reconnection. The rollout of AMI meters is expected to significantly improve Western Power's compliance performance. Given this, until the completion of the AMI meter rollout, we find that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 1/2023: CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[5]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.	B	2

[5] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
244A	A distributor must reconnect the customer's supply address on the request of a retailer within the timeframes specified in subclause 54(4), if the circumstances specified in subclause 54 (2) apply.	2	CutlerMerz has interviewed key personnel from Meter Data Management, conducted a walkthrough of the MBS, reviewed the procedures and processes in place for managing re-energisations, and examined Western Power's PowerBI dashboard that links directly to the metering business system (MBS) and Western Power's log of wrongful de-energisations, the "Wrongful De-en/Cross Meter Log". We determined the following: - Wrongful disconnections are rare, typically occurring up to 3 times a year. - In the aftermath of a wrongful disconnection Western Power typically endeavours to improve associated procedures. - One example of a wrongful disconnection over the audit period was a situation where the team was instructed to disconnect a Unit B in a regional location, where Unit A was at the back of the property and Unit B at the front. Nobody was in the disconnected property at the time, but Western Power still made the payment as required. - Wrongful de-energisations are identified either via customer complaints or by field officers, which are to be verified by field officers. - Details of wrongful de-energisations and associated payments are registered in the 'Wrongful De-en/Cross Meter Log'. - This obligation specified the same timeframes as those specified by obligation 244 above, and none of the reconnections which were not completed in these timeframes were the result of wrongful de-energisations. - All wrongful de-energisations over the audit period were at abandoned sites. Findings: CutlerMerz finds that Western Power has complied with this obligation in reconnecting an address in the aftermath of a wrongful disconnection, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
245.	3-Jan-23 CRM: A distributor may only operate a pre-payment meter and a retailer may only offer a pre-payment meter service in an area that has been declared by the Minister by notice published in the Government Gazette.	4	CutlerMerz has interviewed key personnel from Meter Provision, and examined Western Power's Pre-payment meter work procedure and ICT controls documents, and its Pre-payment meter register. We determined the following: - There are only 12 pre-payment meters in operation in Western Power's network, all of which are the Ninga Mia pre-payment meters which have been gazetted by the minister. - Details of the pre-payment meters are recorded it its Pre-payment Meter Register and with a flag in the Metering Business System (MBS). - The field with the per-payment meter flag in the MBS is locked to prevent it from being changed as the result of user error and all changes must be requested via ICT-Metering System Support. - When a pre-payment meter is installed, exchanged, or removed, the register is updated and forwarded to Western Power's Network Operations Control Centre (NOCC) for registration. - Reversion alerts are generated via NOCC and MBS to ensure that reversions are identified as early as possible. Findings: CutlerMerz finds that Western Power has complied with this obligation in its operation of pre-payment meters, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
Pre-payment meters					
256.	If a retailer requests the distributor to revert a pre-payment meter, after a request under subclause 58(1), the distributor must do so within 5 business days after receipt of the request for supply addresses within the metropolitan region, and within 10 business days for supply addresses within regional areas.	4	Obligations 256 to 263 CutlerMerz has interviewed key personnel from Meter Provision, and examined Western Power's Pre-payment meter work procedure and ICT controls documents, and its Pre-payment meter register. We determined the following: - There have been no requests for Western Power to revert any pre-payment meters over the audit period. - There are only 12 pre-payment meters in operation in Western Power's network. - Details of the pre-payment meters are recorded it its Pre-payment Meter Register and with a flag in the Metering Business System (MBS). - The field with the per-payment meter flag in the MBS is locked to prevent it from being changed as the result of user error and all changes must be requested via ICT-Metering System Support. - When a pre-payment meter is installed, exchanged, or removed, the register is updated and forwarded to Western Power's Network Operations Control Centre (NOCC) for registration. - Reversion alerts are generated via NOCC and MBS to ensure that reversions are identified as early as possible. - Western Power has not been requested by a retailer to check or test a pre-payment meter over the audit period. Findings: CutlerMerz finds Western Power's controls can be expected to, so far as reasonably practicable, ensure compliance.	A	N/R
258.	If a retailer requests a distributor to revert a pre-payment meter under subclause 59(1)(b), the distributor must revert the pre-payment meter within the time frames specified in subclause 59(2)(a)-(b).	2		A	N/R
263.	If requested by a retailer, a distributor must check or test a pre-payment meter.	4		A	N/R
Information and communications					
283.	3-Jan-23 CRM: On request and at no charge, a distributor must provide a customer with the information specified in subclause 10.6.	4	CutlerMerz has interviewed key personnel from the Customer Service Centre and examined Western Power's Customer Service Centre Training Manual and its website. We determined the following: - Requests for distribution-related information are not common, as this information is made available through Western Power's website. - Such requests are generally received via phone, website, or social media. - Customers were not charged for the provision of requested distribution-related information. Findings: CutlerMerz finds that Western Power has complied with this obligation in its provision of distribution-related information, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
283A	A distributor must publish on its website the information detailed in subclause 75(1)(a) to (k).	4	Obligations 283A to 283C CutlerMerz has interviewed key personnel from the Customer Service Centre and examined relevant communications. We determined that on request, the customer would be provided a link to Western Power's website where the information specified can be found. Findings: CutlerMerz finds that Western Power has complied with these obligations in its provision of the specified information, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
283B	If a customer requests information of the kind referred to subclause 75(1) the distributor must refer the customer to the distributor's website or provide the information to the customer without charge.	4		A	1
283C	If a customer requests a copy of information of the kind referred to in subclause 75(1), the distributor must provide a copy of the information to the customer without charge.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
283D	A distributor must give to a customer on request, at no charge an explanation for any unplanned or approved change in the quality of supply of electricity to the customer's supply address outside of the limits prescribed by law, and an explanation for any unplanned interruption of supply of electricity to the customer's supply address.	4	CutlerMerz has interviewed key personnel from the Customer Service Centre and examined Western Power's Customer Service Centre Training Manual and its website. We determined the following: - Requests for information and explanations relating to unplanned or approved changes in the quality of supply or interruptions have become less common as Western Power's website now provides such information. - Such requests are generally received via phone, website, or social media. - Customers were not charged for the provision of requested distribution-related information. Findings: CutlerMerz finds that Western Power has complied with this obligation in its provision of information and explanations relating to unplanned or approved changes in the quality of supply or interruptions, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
284.	3-Jan-23 CRM: On request, a distributor must provide a customer with their consumption data.	4	Obligations 284 to 287 CutlerMerz has interviewed key personnel from the Customer Service Centre and Meter Data Management, and examined documentation of its Customer Management System (CMS) and relevant communications. We determined the following: - Western Power provides consumption data to customers who request it immediately and free of charge. Such instances are rare. - If a query is received through the call centre the call is referred to the Metering Team. - If a query is received via email, a response is provided by email direct in a format that is easily interpretable. - If the query goes through the 'Contact Us' portal on the website it is written in the CMS. - Western Power's relevant training documentation and knowledge base is embedded in the CMS. - Customers who have requested periodic notification of consumption data are registered in MBS to receive data automatically. - Western Power has so far kept all data for an unlimited timeframe and not just the minimum seven years in its EDW Oracle database, but this is currently under review. - Western Power conducts compliance training for relevant personnel on the Small Use Customer Code and the Metering Code. Findings: CutlerMerz finds that Western Power has complied with these obligations in its provision of consumption data to a customer on request and in meeting the associated timeframes, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
285.	3-Jan-23 CRM: If a customer requests their consumption data under subclause 10.7(1), the distributor must provide the information at no charge in the circumstances specified in subclause 10.7(2)(a)-(b).	4		A	1
286.	3-Jan-23 CRM: A distributor must provide a customer with the requested consumption data within 10 business days of the receipt of: · the request; or · payment of the distributor's reasonable charge for providing the consumption data (if payment is required and requested by the distributor within 2 business days of the request).	4		A	1
287.	3-Jan-23 CRM: A distributor must keep a customer's consumption data for 7 years.	4		A	1
288.	3-Jan-23 CRM: On request, a distributor must inform a customer how the customer can obtain information on distribution standards and metering arrangements prescribed under the specified Acts that are relevant to the customer or adopted by the distributor.	4	Obligations 288 to 289 CutlerMerz has interviewed key personnel from Meter Data Management and the Customer Service Centre, and examined the Build Pack and the Customer Service Centre training manual. We determined the following:	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
289.	3-Jan-23 CRM: A distributor must publish information on distribution standards and metering arrangements on its website.	4	- Western Power's website contains details of distribution standards and metering arrangements. - The Build Pack is updated when metering arrangements and distribution standards are updated. - The Metering Team is responsible for updating the information on the website. - On request, if a team member in the Customer Service Centre is unable to answer a customer's query relating to distribution standards and metering arrangements, it is referred to the Metering Team. Findings: CutlerMerz finds that Western Power has complied with these obligations in ensuring that written information provided to customers is presented in a clear, simple, and concise manner and in a format that is easy to understand. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
290.	To the extent practicable, a retailer or distributor must ensure that any written information that must be given to a customer by the retailer or distributor or its electricity marketing agent under the Code of Conduct is expressed in clear, simple, concise language and in a format that is easy to understand.	5	CutlerMerz has interviewed key personnel from Customer Service and examined Western Power's website, sample communications, and Writing Style Guide. We determined the following: - Western Power has a writing style guide which requires communications to be written in a simple, clear, and concise manner and in a format and structure that is intuitive and easy to understand. - All communications and materials available on their website reviewed are consistent with the writing style guide. - The writing style guide is subject to reviews and updated from time to time. Findings: CutlerMerz finds that Western Power has complied with this obligation in ensuring that written information provided to customers is presented in a clear, simple, and concise manner and in a format that is easy to understand. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
291.	3-Jan-23 CRM: On request, a retailer and a distributor must inform a customer how to obtain a copy of the Code of Conduct.	4	Obligations 291 to 292 CutlerMerz has interviewed key personnel from the Customer Service Centre and examined relevant communications. We determined that on request, the customer would be provided a link to the Electricity Industry Code of Conduct. Findings: CutlerMerz finds that Western Power has complied with these obligations in its provision of the specified information, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
292.	3-Jan-23 CRM: A retailer and distributor must make electronic copies of the Code of Conduct available on their websites, at no charge.	4		A	1
294.	On request and at no charge, a retailer and a distributor must make services available to a residential customer to assist the customer in understanding information provided by the retailer or distributor (including independent interpreter services for customers with speech or hearing impairment, and large print copies).	4	Obligations 294 to 295 CutlerMerz has interviewed key personnel from the Customer Service Centre and examined relevant training documentation and sample communications and invoices. We determined the following: - Western Power uses the National Relay Service provided by the Commonwealth Government and the TIS (Transition and Interpreter) Services, the information for both is provided on Western Power's invoices and associated communications. Findings: CutlerMerz finds that Western Power has complied with these obligations in its provision of accessibility related information, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
295.	For residential customers, a retailer and, if appropriate, a distributor, must include the information prescribed in subclause 78(2)(a) and (b) on its bills and bill-related information, reminder notices and disconnection warnings.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
296.	On request and at no charge, a distributor must advise a customer of the availability of different types of meters, as well as their suitability for the customer's supply address, purpose, costs, and installation, operation and maintenance procedures.	4	CutlerMerz has interviewed key personnel from Meter Data Management, examined Western Power's website, and reviewed procedures and processes relating to metering arrangements. We determined the following: - Western Power endeavours to advise on the suitability of different types of meters when requested and at no charge, but that such requests are rare. - Such requests are rare due to Western Power replacing meters themselves. - Information on the availability of meters is on its website. - The Customer Service Centre will refer a customer to the website and provide a link on request. Findings: CutlerMerz finds that Western Power has complied with this obligation in its provision of information relating to availability and suitability of different types of meters. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
297A.	A distributor who disconnects or interrupts a customer's supply address for emergency reasons must provide a 24- hour emergency line, as prescribed under subclause 80(a) and use its best endeavours to restore supply as soon as possible	4	CutlerMerz has interviewed key personnel from the Customer Service Centre, and examined Western Power's Annual Compliance Reports, relevant Standard Operating Procedure documents, and its Prioritising Network Restoration Guideline. We determined the following: - This obligation was introduced in February of this year and has complied with the obligation since. Wester Power reported a non-compliance in its FY2021 Annual Compliance Report for obligation 233 which is in effect the same obligation. This is discussed in further detail under obligation 233. - In response to the non-compliance, a backup plan (Kytec Call Mapping) was implemented for when calls cannot be delivered to the standard phone system. The Customer Service Centre team manually implements a bypass to an alternative number (via Kytec), which plays an emergency message directing people to call 000 if they are calling about a life-threatening emergency (LTE). - Additional new solutions are being investigated as part of current system upgrades. - Restoration work is prioritised in Western Power's PowerOn Advantage distribution management system, based on criteria outlined in Western Power's standard operating procedure documents. - Western Power uses mobile generators during unplanned outages to minimise the outage duration and customers affected. - The eNAR system discussed in further detail under obligation 465 enhances the field crew's ability to prioritise and reduce the duration of interruptions. - Western Power redeploys staff from other areas when necessary. Findings: CutlerMerz finds that Western Power has complied with this obligation since it came into effect in 20 February 2023 up to and including 30 June 2023. We find that the measures implemented in response to the non-compliance to obligation 233 (discussed under obligation 233) can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
297E	If a retailer notifies the distributor that a person residing at a customer's supply address requires life support equipment or that there has been a change of details or circumstances previously notified by the retailer, then the distributor must register the customer's supply address as a life support equipment address or update the details or circumstances previously notified by the retailer.	2	CutlerMerz has interviewed key personnel from the Customer Service Centre, Network Control, examined Western Power's Annual Compliance Reports, and conducted sample testing of updates to the LSE register and associated communications. We determined the following: - On 22 March 2023, Western Power notified the ERA of a non-compliance incident. Western Power did not add or update the email addresses of nine LSE customers within the required time between 20 February 2023 and 22 March 2023. - Although Western Power had registered the supply address and other contact details of these customers as required, it used another process for updating email addresses, which resulted in the delay and led to the compliance breach. - None of the nine LSE customers were adversely affected, as they did not experience a planned or unplanned outage during this period. - Western Power has implemented an interim solution to automatically extract the customer's email address from the retailer's notification and add it to its LSE register. - Western Power intends to implement a permanent solution that involves changing its systems for managing this information. This will require the agreement of retailers. The permanent solution is expected to be implemented by late 2024. - The ERA will seek a status update from Western Power on these actions in November 2023. - Testing of 78 samples of changes to the LSE register selected at random throughout the audit period and examination of all monthly LSE register reconciliation files revealed no additional non-compliances with respect to the updating of the LSE register. - Further examination of the LSE register for non-compliance with respect to the timeframe to update email addresses did not reveal any additional non-compliances. Therefore, the non-compliance was limited to the nine LSE customers identified by Western Power. Findings: CutlerMerz finds that, as reported to the ERA, Western Power has not complied with this obligation in meeting its obligation to update its LSE register. We find that in the absence of a permanent solution to update email addresses in the LSE register, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure ongoing compliance. Recommendation 4/2023: CutlerMerz recommends that Western Power pursue and monitor the progress of the implementation of a permanent solution to update emails in the LSE register, and seek collaboration with retailers where necessary.	B	2
297F	A distributor must not undertake a planned interruption of the supply of electricity to a life support equipment address unless the distributor has met the conditions prescribed under subclause 84(1).	2	Obligations 297F to 297G CutlerMerz has interviewed key personnel from Meter Data Management and Network Project Delivery, reviewed Western Power's procedures surrounding de-energisations, conducted a walkthrough of the Metering Business System (MBS), and examined documentation of its Outage Notification and Evidence (ONE) system, its internal audits on the planned interruptions process, and an extract from the ONE system containing the details of all planned outages (including the date of notification and of the outage) that affected LSE addresses and other supporting evidence. We determined the following: - To provide at least three business days' notice of planned interruptions to LSE addresses, Western Power sends a notification to the supply address or another nominated address 10 days prior to the planned interruption, and uses best endeavours to obtain acknowledgement of receipt of the notification, unless the LSE customer has opted out of being contacted. On the day of the planned interruption, a field officer performs a door knock on the LSE supply address. - In this context, Western Power's approach to 'best endeavours' for contacting the customer is to attempt 3 phone calls, at least 4 hours apart, over 2 days. - Western Power's automated ONE system (Outage Notification and Evidence) performs a sweep to determine if any new LSE customers are in the	A	1
297G	If subclause 84(2) applies, the distributor must use its best endeavours to contact the customer, or someone residing at the supply address, before the interruption occurs.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			planned interruption area between day 10 and day 1. - In the case of an interruption to restore supply to a supply address that is registered as a LSE address, Western Power makes best endeavours to notify the LSE customer. - An output from the ONE system with the details of all planned outages and related evidence reflected showed that someone residing at all LSE addresses affected by a planned outage during the audit period were notified at least three business days prior. This includes 2407 eNAR planned outage work orders and 2109 unique addresses. Findings: CutlerMerz finds that Western Power has complied with these obligations in not disconnecting LSE addresses for failure to pay a bill and in its provision of notice, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.		
297(M)	A distributor must de-register a life support equipment address in accordance with the relevant standard for a distributor.	4	CutlerMerz has interviewed key personnel from Network Operational Systems, conducted sample testing of notifications and updates to the Life Support Register, and reviewed the procedures and processes in place for maintaining records of life support equipment addresses. We have determined the following: - Supply addresses are automatically added and removed from the Life Support Register, which is a component of Western Power's Customer Management System (CMS), there is a flag in the CMS system for life support addresses. - The automated process also conducts checks, each customer has a reference number and an associated checksum. - There are additional daily manual checks performed in excel for the register. The personnel responsible look at the notification that came in and perform a sum check on how many are on there, and how many were removed. This is in case of a problem with the IT system, there have been no system failures thus far. - There is a monthly check with Synergy. Synergy's current register is compared in its entirety to the WP register to determine any issues. Other retailers are asked to confirm registers bi-monthly. - There are timestamps for the data in a log that is kept on the automated system, timestamps are to the millisecond. - Western Power is informed through both email and its B2B gateway, depending on the arrangements with the retailer. - It takes approximately five minutes for the life support information to be updated in the system, the system performs a check every 5 minutes to poll whether there is available information. Findings: CutlerMerz finds that Western Power has complied with this obligation in its maintenance of its life support equipment customer details, and finds that Western Power's controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
297(N)	Despite subclauses 86(1) to (7), a supply address must not be de-registered if the retailer is aware that another person residing at the supply address still requires life support equipment.	4	CutlerMerz has interviewed key personnel from Network Control, examined sample daily checks for the LSE register, and reviewed Western Power's procedures and processes for managing its LSE register. We determined that there is no distinction in notification from the retailer between a customer at an address and an address, Western Power is notified of whether or not an address is LSE address, and not of the details of individual residents of that address. Findings: CutlerMerz finds that Western Power has complied with this obligation in its updating of its LSE register, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
Complaints & dispute resolution					
298.	Each retailer and distributor must develop, maintain and implement a standard complaint and dispute resolution procedure.	4	Obligations 298 to 299A CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's Complaints handling process on its website, its Complaint Management and Dispute Resolution Procedure, and the AS/NZS 10002:2014 standards. We determined the following: - Complaint Management and Dispute Resolution Procedure contains the requisite information under clause 87(2). - It is compliant with the AS/NZS 10002:2014 standards. Findings: CutlerMerz finds that Western Power has complied with these obligations in its maintenance of its Complaint Management and Dispute Resolution Procedure which contains the requisite information and complies with the relevant standards. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
299.	The standard complaints and dispute resolution procedure under subclause 87(1) must comply with the requirements specified in subclauses 87(2)(a), (b), (c) and (d).	4		A	1
299A	The standard complaints and dispute resolution procedure must comply with AS/NZS 10002:2014.	4		A	1
300.	3-Jan-23 CRM: A retailer or a distributor must advise the customer in accordance with subclause 12.1(3).	4	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's Complaints handling process on its website, its Complaint Management and Dispute Resolution Procedure and Complaints and resolution work instructions. We determined the following: - In all email responses to customers, there is a paragraph at the end of the response stating that a customer can seek a senior employee review in the first instance. They also receive a link to the complaints handling process. Customers are also notified of their right to refer their complaints to the Ombudsman. - The complaints handling process is available on Western Power's website at no charge. - All such communications are logged into Western Power's Customer Management System (CMS), in the CMS, a complaints and resolution work instruction has a 20 business day SLA. Findings: CutlerMerz finds that Western Power has complied with this obligation in its maintenance of its Complaint Management and Dispute Resolution Procedure which contains the requisite information and complies with the relevant standards. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
301.	On receipt of a written complaint by a customer, a retailer or distributor must acknowledge the complaint within 10 business days and respond to the complaint within 20 business days.	2	CutlerMerz has interviewed key personnel from Customer Relations and examined documentation of Western Power's Customer Management System (CMS), its Complaint Management and Dispute Resolution Procedure and Complaints and Complaints Classification Matrix. We determined the following: - Western Power reported an instance of non-compliance in the 2021/22 Annual Compliance Report, when Western Power did not acknowledge one customer complaint within 10 business days. - Western Power received a customer complaint letter on 9 February 2022 and an acknowledgment letter was not sent out within 10 business days due to an oversight by the complaint officer who miscalculated the date for response. - A customer acknowledgment letter was sent on 24 February 2022 (the 11th day). - The associated response met the 20 business day timeframe. - The CMS system logs all complaints and provides automatic acknowledgement in the form of an email. - In response to the non-compliance incident, Customer Relations team members are now provided with a WIP dashboard which is updated on a daily basis, and reflects any complaints for which the acknowledgement date has not been filled in in the CMS system. - There is a 'Daily Update' email that is sent around to the team that shows cases that need to be closed and any associated details. - The rate of non-compliance has improved since the prior performance audit period. In the prior audit period 13 customers were affected. Findings: CutlerMerz finds that Western Power has not complied with this obligation over the audit period as reported in its FY2022 Annual Compliance Report. After the implementation of additional controls, CutlerMerz finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance, and makes no further recommendation under this obligation.	A	2
301A	A retailer or distributor must inform the customer of the outcome of a complaints process and, unless the customer has advised the retailer or distributor that the complaint has been resolved in a manner acceptable to the customer, information as detailed in 89(b)(i) to (iii).	2	Refer to findings under obligation 300	A	1
303.	3-Jan-23 CRM: A retailer, distributor and electricity marketing agent must give a customer on request, at no charge, information that will assist the customer in utilising the respective complaints handling processes.	4	Refer to findings under obligation 300	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
304.	If a retailer, distributor or electricity marketing agent receives a complaint from a customer that does not relate to its functions, it must advise the customer of the entity that it reasonably considers to be appropriate to deal with the complaint (if known).	4	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's Complaints handling process on its website, its Complaint Management and Dispute Resolution Procedure and Complaints and Complaints Classification Matrix. We determined the following: - The email template that is attached to the Customer Management System (CMS) refers the customer to Synergy for matters that do not relate to Western Power, a common example is if they're unhappy with their bill. - The Complaints Classification Matrix provides guidance on the boundaries of Western Power/Synergy and related protocols. - If claim has been declined because of a third party, Western Power will let them know if they can disclose the reason for it. Findings: CutlerMerz finds that Western Power has complied with this obligation in its referral of complaints to the relevant entity if it is not relevant to Western Power, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
Reporting					
305.	3-Jan-23 CRM: A retailer and a distributor must prepare a report in respect of each reporting year setting out the information specified by the ERA.	4	Obligations 305 to 307 CutlerMerz has interviewed key personnel from Regulatory Compliance and has examined Western Power's datasheets, associated communications, and its ability to provide hard copies at its head office. We determined the following: - During the audit period, all such reports requested by the ERA that are done so solely under obligation 305 and not another obligation under another Code, are what are referred to as datasheets. - The only other report requested that obligation 305 would apply to is the Service Standard Performance Report, which is covered under the Access Code. - Western Power's datasheets were published on the website during the audit period, and sample communications show that they were done so in the manner and form specified by the ERA. - Western Power has demonstrated that it has the capability to print hard copies of its datasheets at reception and that staff at the front desk are trained to provide these without cost. Findings: CutlerMerz finds that Western Power has complied with these obligations in its preparation, provision, and publishing of datasheets specified by the ERA. We find that its controls can be expected to, so far as reasonably practicable, ensure compliance but it should be noted that this obligation has been removed from the Electricity Compliance Reporting Manual.	A	1
306.	3-Jan-23 CRM: The report specified in clause 13.1 must be provided to the ERA by the date, and in the manner and form, specified by the ERA.	4		A	1
307.	3-Jan-23 CRM: The report specified in clause 13.1 must be published by the date specified by the ERA. In accordance with clause 13.3(2), a report is published if: · copies are available to the public, without cost, in places where the retailer or distributor transacts business with the public; and · a copy is posted on the retailer or distributor's website.	4		A	1
Service standard payments					
309.	Unless clause 99 applies, if a retailer makes a payment under clause 94 due to an act or omission of a distributor, the distributor must reimburse the retailer for the amount of the payment.	4	Obligations 309 to 311 CutlerMerz has interviewed key personnel from Meter Data Management, and reviewed the procedures and processes in place for managing disconnections and reconnections. We determined the following: - In no circumstances over the audit period did a retailer make a payment for a wrongful disconnection due to an action or omission of Western Power.	N/P	N/R
311.	Unless clause 99 applies, if a retailer makes a payment under clause 95 due to an act or omission of a distributor, the distributor must reimburse the retailer for the amount of the payment.	4		N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			- Wrongful disconnections are rare. - Western Power pays customers directly for wrongful disconnections. - Western Power would typically notify themselves of a wrongful disconnection. - Relevant reports sent to the ERA in the form of datasheets Findings: CutlerMerz makes no findings as no activity occurred with respect to these obligations over the audit period.		
313.	3-Jan-23 CRM: Subject to clause 14.6, a distributor must pay the customer $20 if the distributor has failed to acknowledge or respond to a complaint within the timeframes prescribed in subclause 12.1(4).	4	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's Complaints and Resolution Payment We determined the following: - Over the audit period, there has only been one instance where the acknowledgement of or response to a complaint was not completed in the requisite timeframes. This is discussed in further detail under obligation 301. - Customers frequently lodge for non-acknowledgement, these are all captured against the payment spreadsheets they receive, then an investigation is performed to see if a complaint has been lodged. In the majority of circumstances, these customers intended to make a claim for a planned outage or non-notification of a planned interruption instead. - If the application is determined to be valid, a payment is triggered. - The team will contact the customer and engage with them if they have not lodged a complaint and ask them if they would like to lodge one. Findings: CutlerMerz finds that Western Power has complied with this obligation in its payment for failure to acknowledge or respond to a complaint within the specified timeframes, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
313A	Unless clause 99 applies, a distributor must pay the customer $100, for each day that the customer is wrongfully disconnected, if the distributor disconnects a customer's supply address other than under the circumstances detailed in subclause 97(1)(a) and (b)	4	Refer to findings under obligation 314	A	1
314.	3-Jan-23 CRM: Subject to subclause 14.6, if a distributor disconnects a customer's supply address other than as authorised by this Code or otherwise by law, or as authorised by a retailer, then the distributor must pay the customer $100 for each day that the customer was wrongfully disconnected.	4	CutlerMerz has interviewed key personnel from Meter Data Management, and reviewed the procedures and processes in place for managing disconnections. We determined the following: - Wrongful disconnections are rare, typically occurring up to 3 times a year. - In the aftermath of a wrongful disconnection Western Power typically endeavours to improve associated procedures. - One example of a wrongful disconnection over the audit period was a situation where the team was instructed to disconnect a Unit B in a regional location, where Unit A was at the back of the property and Unit B at the front. Nobody was in the disconnected property at the time, but Western Power still made the payment as required. - Wrongful de-energisations are identified either via customer complaints or by field officers, which are to be verified by field officers. - Details of wrongful de-energisations and associated payments are registered in the 'Wrongful De-en/Cross Meter Log'. Findings: CutlerMerz finds that Western Power has complied with this obligation in its payment to customers for wrongful de-energisation, and that its controls can be expected to, so far as is reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
314A.	Unless clause 99 applies, if a distributor fails to acknowledge or respond to a written complaint made by a customer within the timeframes set out in clause 88, the distributor must pay the customer one payment of $20 for each complaint.	4	Refer to findings under obligation 313	A	1
316.	A distributor that is required to make a payment under clause 97 or 98 must do so in the manner specified in subclause 100(2).	4	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's Complaints and sample Resolution Payment spreadsheets and documentation of its Ellipse payment system. We determined Western Power makes all service standard payments directly through its Ellipse payment system and has not and has no intention to opt to make such payments through a retailer. Findings: CutlerMerz finds that Western Power has complied with this obligation in paying all service standard payments directly to the customer, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
15 Electricity Industry Metering Code – Licence Conditions and Obligations					
317.	A network operator must treat all Code participants that are its associates on an arms-length basis.	5	CutlerMerz has interviewed key personnel from Customer Relations and examined Western Power's organisational structure. We determined the following: - Western Power does not have any associates as defined in the Metering Code over the audit period 1 July 2020 to 30 June 2023. - Examination of Western Power's organisation structure revealed no associate as defined by the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation, as no associates were identified, Western Power was not found to be contravening Metering Code requirements to deal with associates on an arms-length basis.	A	1
318.	A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code, unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	4	- CutlerMerz arrived at the same findings as in obligation 317, that Western Power complied as no associates were identified.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
319.	A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's manufacturer's certificates of compliance and metrology procedure. We determined the following: - Western Power provided certificates of compliance that meters procured from manufacturers meet the technical specifications prescribed by the metrology procedure and the National Measurement Act. - Western Power additionally performs rigorous sample testing of meter population for reading accuracy and communication links before meters are installed and also on meters in-service in the field. - Daily automated validation checks on meter reading also ensure that meter reading complies with all obligations. - An inspection of Western Power's meter testing laboratory and inspection and acceptance testing procedure demonstrated calibration testing in accordance with the metrology procedure and the National Measurement Act. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure meters used comply with the specifications outlined in the metrology procedure and the National Measurement Act.	A	1
320.	An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of the measurements that are specified in subclauses 3.2(1)(a)(b) using dials, a cyclometer, an illuminated display panel or some other visual means.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure and website. We determined the following: - Western Power maintains a read your meter instruction on its website detailing the items displayed on Western Power accumulation meters that conform to the specifications in the metrology procedure and display of measurements in the Metering Code. - Inspection of accumulation meters at Western Power's laboratory displayed the measurements listed in the Metering Code and the metrology procedure. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure meter access and required measurements to be displayed.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
320A.	If a meter declared to be an accumulation meter is in a metering installation for a connection point that becomes associated with a contestable customer: · the declaration of that meter as an accumulation meter will be deemed to have ceased at the time the relevant connection point became associated with a contestable customer; and · the network operator must promptly remove the meter from any declared accumulation meter list and record the meter as an interval meter in the registry.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined information from the MBS. We determined the following: - Contestable customers are not eligible for accumulation meter installations as recognised in Western Power's metering business system database. - The metering business system is used to schedule meter installation and maintenance and flagging the meter and customer type associated with each NMI to ensure only interval meters are installed. - Western Power is also currently undertaking a replacement of all accumulation meters on its network with interval meters in order to meet the requirements of 5 minute settlement protocols in 2025. Findings: CutlerMerz finds that Western Power has complied with this obligation by confirming appropriate installation of meters for contestable customers and appropriate reporting of accumulation meters in the MBS.	A	1
321.	An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined meter manufacturer documents. We determined the following: - As described in the meter manufacturer model documents, Western Power's interval meters are capable of downloading energy data manually via the handheld devices or remotely via a communications link in compliance with the metrology procedure. - The Metering Technical Services Team advised on site in the meter testing laboratory the process of ensuring meters are equipped with a functioning communications card to be remotely read, and the communications card was inspected during the laboratory visit. Findings: CutlerMerz finds that Western Power has complied with this obligation by confirming the technical capability of its meters.	A	1
322.	If a metering installation is required to include a communications link, the link must, where necessary, include a modem and isolation device approved under the relevant telecommunications regulations that allows the interval energy data to be downloaded in the manner prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined meter manufacturer documents. We determined the following: - Western Power provided documents that describes the communications device on the meter that is approved with ACMA certification and also approved by Telstra's after testing with certification, demonstrating compliance with the relevant telecommunications regulations. - Western Power Metering Technical Staff provided a demonstration of energy data retrieved from remotely read interval meters into the metering business system (database) as compliant with the Metering Code and legislation. - The metering technical services team advised on site in the laboratory the process of ensuring meters are equipped with a functioning communications card to be remotely read and the communications card was inspected during the laboratory visit. Findings: CutlerMerz finds that Western Power has complied with this obligation by confirming the technical capability of its meters.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
323.	A network operator must ensure that bi-directional electricity flows do not occur at a metering point unless the metering installation for the metering point is capable of separately measuring and recording electricity flows in each direction.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined records kept within the MBS and meter procurement documents. We determined the following: - Western Power procures all new meters with capability to read bi-directional energy flows available to new connections that allow bi-directional energy flows. - Western Power demonstrated the metering business system database that records details of customer connections, including the ability to flow energy bi-directionally, ensuring that any future meter replacements are made with meters capable of measuring bi-directional energy flows. - Western Power also replaces meters not capable of measuring bi-directional energy flows on request of retailers with meters that can measure bi-directional flows. Findings: CutlerMerz finds that Western Power has complied with this obligation by confirming the technical capability of its meters to read bi-directional energy flows.	A	1
325.	An accumulation meter or an interval meter that separately measures and records bi-directional electricity flows at the metering point must record: · the net electricity production transferred into the network; and · the net electricity consumption transferred out of the network.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined records kept within the MBS and meter procurement documents. We determined the following: - The Western Power Metering Technical Services Team advised that all new meters are capable to be programmed to read bi-directional energy flows. - Western power administers the services apparatus connection scheme and the contractor connection scheme that requires contractors to install bi-directional meters associated with the solar PV connection process. - Metering installations are audited and authorised under these schemes to ensure compliance with the Metering Code. - Wester Power is undertaking a process to replace all accumulation meters with interval meters capable of reading energy data remotely. Findings: CutlerMerz finds that Western Power has complied with this obligation by confirming the technical capability of its meters to read bi-directional energy flows.	A	1
326.	A network operator must ensure that there is a metering installation at every connection point on its network that is not an unmetered connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - The non-compliance occurred in 4 instances (1 in FY2021, 2 in FY2022 and 1 in FY2023) over the audit period and related to unusual circumstances where a damaged meter required substituted data, the other non-compliance related to unit complex with unique circuit setup not allowing sub-metering. - Metering technical services staff provided a walkthrough of the data visualisation tool used to inspect daily meter readings to ensure compliance of metering installations under Appendix 1 of the Metering Code. Western Power maintains a data visualisation tool raises alarms on the quality of meter reads based on atypical patterns of energy data that may be indicative of a defective meter. - Western Power undertakes 15,000-20,000 connections annually, supported by a robust process under the service apparatus connection scheme and the contractor connection scheme. The connection schemes service installation rules and authorisation with installers audited to ensure installations are compliant with the Western Australia service installation rules.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			Findings: CutlerMerz finds that Western Power has not complied with this obligation to ensure that there is a meter installation at every connection point.		
327.	For each metering installation on its network, a network operator must provide, install, operate and, subject to subclause 3.7(5), maintain the metering installation in the manner prescribed, unless otherwise agreed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure. We determined the following: - The metering technical services team advised that the metrology procedure guides meter installations to maintain the metering installation as prescribed by the Metering Code. - Installations comply with "good electricity industry practice" which is informed by collaboration with other utilities at industry forums, employing metering specialists with NATA accreditation, following AEMO industry guidance and training, NECA association hold forums to discuss metering installation best practice. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that meter installations comply with good industry practice and in accordance with the metrology procedure and the Metering Code.	A	1
328.	Except for a Type 7 metering installation, a network operator must ensure that the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's installation design document. We determined the following: - Inspection of Western Power's metering installation design document and interview with their Metering Technical Services Team demonstrated a process to ensure the metering point is located as close as practicable to the connection point and in accordance with the Western Australian service installation rules. - As per the obligation Installations comply with "good electricity industry practice" which is informed by collaboration with other utilities at industry forums, employing metering specialists with NATA accreditation, following AEMO industry guidance and training, NECA association hold forums to discuss metering installation best practice. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that meter installations is as close as practicable to the connection point.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
329.	A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement that it has with the user.	4	CutlerMerz has interviewed key personnel from Western Power's Commercial Services Team and examined Western Power's model service level agreement. We determined the following: - The commercial services team advised charging for services provided at a fixed fee as per schedule 5 of the model service level agreement. Additionally, Western Power send a monthly report to the retailer outlining all services provided for the month, also outlining the performance standard achieved. - The commercial services team advised that extra charging may be required where no site access exists, and these fees are charged as per schedule 5 of the model service level agreement. - The commercial services team advised that Western Power has an internal process to identify exemptions from providing services as per the services agreement, given inability to access sites or risk of injury to Western Power staff as a result of interaction with aggressive customers not permitting entry. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that charges imposed for installing, operating or maintaining a meter installation are in accordance with the applicable service level agreement.	A	1
330.	If a network operator becomes aware that a metering installation does not comply with the Code, it must advise affected parties of the non-compliance and arrange for the non-compliance to be corrected as soon as practicable.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's emails to a retailer. We determined the following: - Western Power provided emails to a retailer notifying of non-compliant metering installations on three occasions: 10, 16 and 23 November 2022. - Evidence of emails were associated with non-compliances were in relation to defective meters and inaccurate meter reading. Findings: CutlerMerz finds that Western Power has complied with this obligation to advise affected parties of non-compliant meter installations.	A	1
331.	All devices that may be connected to a telecommunications network must be compatible with the telecommunications network and comply with all applicable State and Commonwealth enactments.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined manufacturer certificates of compliance. We determined the following: - Interview with the metering technical services teams outlined a procedure to verify all certificates of compliance associated with meter communications capability. - Western Power provided certificates of compliance in relation to metering equipment procured with ACMA accreditation and compliance certification from Telstra, supporting compliance with relevant State and Commonwealth enactments. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure installed devices are compatible with the telecommunications network, as well as State and Commonwealth enactments.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
332.	Subject to clause 3.27, a network operator must ensure that, consistent with the standards of good electricity industry practice, each metering installation on its network is secured by devices or methods that hinder unauthorized access and enable unauthorized access to be detected.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering technical procedure manual. We determined the following: - Interview with the metering technical services teams outlined Western Power's security policy that requires security seals on all meters, approved locks on meter panel boxes and alarms that notify of a security breach on new type 4 meters. - Westen Power provided a metering technical procedure manual which detailed the procedures identified in the interview with the Metering Technical Services Team. Findings: CutlerMerz finds that Western Power has complied with this obligation and demonstrated controls to hinder and detect authorised access to metering installations on its network.	A	1
333.	Subject to subclauses 3.9(4), 3.9(5) and 3.9(7), each metering installation must meet at least the requirements for that type of metering installation as specified in Table 3 in Appendix 1 of the Code for metering installations on the SWIN or in Table 3A in Appendix 1 for metering installations on a network other than the SWIN.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering technical procedure manual. We determined the following: - Non-compliance related to accuracy of meter readings observed during testing. Western Power replaced meters that failed testing. The non-compliance affected 15 meters in FY2021 and no compliance breach in FY2022 or FY2023. - Western Power proactively identified the non-compliance and replaced the meter as required. - Metering technical services staff provided a walkthrough of the data visualisation tool used to inspect daily meter readings to ensure compliance of metering installations under Appendix 1 of the Metering Code. The data visualisation tool raises alarms on the quality of meter reads based on atypical patterns of energy data that may be indicative of a defective meter. Western Power also maintains a rigorous batch testing of meters in accordance with compliance requirements in Appendix 1 of the Metering Code prior to installation of meters in the field. - Western Power documents reasons for failed meter testing in metering performance quality reports and notes any non-compliance with the Metering Code in quarterly compliance reports that are submitted to executive staff at Western Power. In response to the non-compliance, Western Power: - Is continuing with the planned rollout of remotely read AMI meters.which assists in more thoroughly monitoring meter performance with energy data being downloaded daily, compared to manually read meters which provide data less frequently. - Continues to monitor meter performance with a data visualisation tool that raises alarms on the quality of meter reads based on atypical patterns of energy data that may be indicative of a defective meter. Findings: CutlerMerz finds that Western Power has not complied with this obligation to ensure that each metering installations meets all the requirements in Appendix 1 of the Electricity Industry Metering Code. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance.	B	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			Recommendation 1/2023: CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[6]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.		
334.	A metering installation used to supply a customer with requirements above 1000 volts that requires a VT and whose annual consumption is below 750MWh must meet the relevant accuracy requirements of a Type 3 metering installation for active energy only.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's HV meter installation design document. We determined the following: - Western Power provided documentation of tests performed by the manufacturer of metering equipment used in type 3 metering installations that demonstrated compliance with the accuracy requirements for active energy only. This includes accuracy of CT and VT equipment for high voltage connections. - Interviews with the Metering Technical Services Team provided evidence of a robust design specification process for type 3 metering installations for large customers typically connected at high voltage. This oral evidence was corroborated with description of procedures within the HV meter installation design document. Findings: CutlerMerz finds that Western Power has complied with this obligation and met the accuracy requirements for type 3 metering installation.	A	1

[6] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
335.	If compensation is carried out within the meter, then the resultant metering system error must be as close as practicable to zero.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's technical specification for revenue meters document. We determined the following: - Inspection of the technical specification for revenue meters demonstrated compensation functionality for remotely read meters and compliance with the Metering Code requirements that system error must be as close as practicable to zero. - The metering technical services team advised that no metering errors had occurred during the audit period that would give rise to compensation. Findings: CutlerMerz finds that Western Power has complied with this obligation and demonstrated that meter compensation functionality ensures errors are as close as practicable to a zero value.	A	1
336.	A network operator must ensure that any programmable settings in any of its metering installations, data loggers or peripheral devices, which may affect the resolution of displayed or stored data, satisfy the relevant requirements specified in the applicable metrology procedure and comply with any applicable instructions by the National Measurement Institute under the National Measurement Act.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's technical specification for revenue meters and metrology procedure documents. We determined the following: - Non-compliance related to discrepancies between meter installation asset details and the database details in MBS for CT meters on 6 sites that were proactively identified by Western Power. The non-compliance affected 6 customers and 4 retailers in FY2022 and 1 customer and 1 retailer in FY2023. - The metering inspection is carried out to ensure the meter functions in accordance with the revenue meter technical specifications that is consistent with the requirements in the Metering Code. - Western Power's high voltage measurement current and voltage transformers design guidelines outlines Western Power's meter reading accuracy requirements for CT meters, that must be supported by a test certificate to demonstrate meter calibration is traceable to the Australian National Measurement Institute. - The metering technical services team provided a walkthrough of their data visualisation tool that provides a number of automated validation checks on meter reads and metadata that describes the characteristics of each metering installation. This mitigates against future compliance breaches associated with erroneous data being entered into the metering business system database that does not match asset installation details. Findings: CutlerMerz finds that Western Power has not complied with this obligation in regard to inaccurate records of meter installation details in the MBS.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
337.	A network operator must ensure that a metering installation on its network is operating consistently with good electricity industry practice to measure and record data and permits the collection of data within the time specified in the applicable service level agreement, for at least the percentages of the year specified.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS and data visualisation tool. We determined the following: - Western Power undertakes rigorous batch testing of new meters before installation in the field which includes time tolerance testing, testing of communications links and data collection within the timeframes prescribed under the Metering Code. - The metering technical services team provided a walkthrough of their data visualisation tool that provides a number of automated validation checks on meter reads in the field which identifies actual reads, substitutions and alerts in instances where meter reads have not been downloaded. - Western Power has demonstrated compliance with the Metering Code in respect of the following: a) if the metering installation does not have a communications link – 99% of the year; and (b) if the metering installation has a communications link: (i) for the communications link – 95% of the year; and (ii) for the rest of the metering installation – 99% of the year. - Installations comply with "good electricity industry practice" which is informed by collaboration with other utilities at industry forums, employing metering specialists with NATA accreditation, following AEMO industry guidance and training, NECA association hold forums to discuss metering installation best practice. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure metering installation is operated with acceptable accuracy performance and in accordance with good electricity industry practice.	A	1
338.	If an outage or malfunction occurs to a metering installation, the network operator must repair the metering installation in accordance with the applicable service level agreement.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - The metering technical services team detailed Western Power's process to replace meters if a metering malfunction has occurred as per Western Power's asset management plan. - Western Power provided a work instruction procedure that details the process to replace or exchange meters, signed off by the meter provision manager. - The metering business system records all requests for metering repairs and replacements associated with an outage or malfunction and is used to schedule jobs to address meter related issues to ensure compliance with service level agreements. - The metering technical procedure manual demonstrates that new remotely-read meters are equipped with an alarm that sends a signal when the meter's battery power levels are low and at risk of being unable to read and send energy usage data as per the obligations in the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to repair the metering installation in accordance with the applicable service level agreement.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
340.	A network operator must ensure that the meters on its network are systematically sampled and tested for accuracy in accordance with AS 1284.13.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - The metering technical services team advised that Western Power conducts an accuracy testing program of a sample of meters in the field and prior to installation to ensure compliance with accuracy requirements stated in AS 1284.13, as per Western Power's metering asset management plan. - Western Power's asset management plan detailed meter population groups and sample sizes used in meter testing, in accordance with AS 1284.13 and the testing procedure outlined in the metrology procedure that has been approved by the ERA. - Western Power provided a guide through the metering testing laboratory explaining calibration and testing procedures that was supported by processes outlined in the inspection and acceptance testing procedure for meters. Findings: CutlerMerz finds that Western Power has complied with this obligation to systematically test meters in accordance with the standard AS1284.13.	A	1
341.	Subject to clause 3.11A(3), if a “population” of meters is deemed to have failed under AS 1284.13, the network operator must ensure that all of the meters in that population are removed and replaced with new meters within 3 years of the testing of the population.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - The non-compliance relates to delays of meter replacements for 17,811 meters that failed sample testing on the 29 March 2018. Inability to access properties, or customers that are unable to be contacted are the main reasons that there are 718 outstanding meter replacements as of 30 June 2022. The number of meters needing to be replaced in each year of the audit period are FY2021 1,813 meters, FY2022 718 meters, FY2023 1 meter. - The metering installation team advised that Western Power proactively prompts customers to replace meters as needed, this includes site visits and use of Land gate to locate sites and customers. This includes identification of vacant sites that are listed for a meter replacement. The requirement to replace a failed meter is cancelled only after a vacant or derelict site is abolished. - Western Power considers that a number of metering replacements cannot be undertaken due to customer not upgrading circuits, unable to access site due to aggressive customers and potential injury to Western Power staff. Western Power liaises with Police in respect of engaging these customers. Findings: CutlerMerz finds that Western Power has not complied with this obligation to replace all failed meters within 3 years of failing testing of the population.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
342.	A network operator must ensure that each metering installation complies with at least the prescribed design requirements.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's website which lists the service apparatus connection scheme and contractor connection scheme and high/low voltage technical design guideline. We determined the following: - Western Power's meter installations are supported by a robust process under the service apparatus connection scheme and the contractor connection scheme. The schemes cover registration and authorisation of contractors and an audit of their meter installation jobs to ensure installations are compliant with the Western Australia service installation rules and all obligations under the Metering Code. - An inspection of the scheme requirements as listed on Western Power's website demonstrated compliance with the requirements in the Metering Code. - All high voltage metering installations must conform to the design requirements outlined in Western Power's high voltage technical design guideline and low voltage connections be compliant with the Western Australian service installation rules. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure each meter installation complies with at least the prescribed design requirements.	A	1
343.	A network operator must ensure that instrument transformers in its metering installations comply with the relevant requirements of any applicable specifications or guidelines, including any transitional arrangements, specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's high voltage design guideline. We determined the following: - As per the obligation 342, Western Power metering installations are supported by the service apparatus connection scheme and the contractor connection schemes which ensures meter installations comply with the requirements in the Metering Code. - Western Power's high voltage measurement current and voltage transformers design guidelines outlines Western Power's meter reading accuracy requirements for CT meters, that must be supported by a test certificate to demonstrate meter calibration is traceable to the Australian National Measurement Institute and compliant with the National Measurement Act. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that instrument transformers comply with the National Measurement Act and the metrology procedure.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
344.	A network operator must provide isolation facilities of a standard consistent with good electricity industry practice, to facilitate testing and calibration of the metering installation.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's high voltage technical design guideline. We determined the following: - Western Power provided detailed schematic diagrams depicting high and low voltage meter installations on its network that demonstrated circuits could be isolated to allow for safe testing and calibration on the meter installation. - All low voltage metering installations must conform to the Western Australian service installation rules and HV technical design guideline which requires isolation for safe testing of meter installations. The connection schemes administered by Western Power support compliance with these obligations as detailed on the Western Power website. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide isolation facilities on meter installations to facilitate testing as prescribed in the Metering Code.	A	1
345.	A network operator must maintain drawings and supporting information, of a standard consistent with good electricity industry practice, to detail the metering installation for maintenance and auditing purposes.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering connection schematic diagrams. We determined the following: - Interview with the metering technical services team advised that Western Power maintains metering installation schematic diagrams that go back to 1950. Diagrams are stored electronically and in physical form onsite. - Inspection of metering installation guidelines in Western Power's meter laboratory corroborated oral evidence provided by the Metering Technical Services Team. Findings: CutlerMerz finds that Western Power has complied with this obligation to maintain drawings and supporting information consistent with good electricity industry practice.	A	1
346.	A network operator must procure the user, or the user's customer, to install, or arrange for the installation of, a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure. We determined the following: - The metering technical services team explained that Western Power only applies full check metering and not partial check metering in respect of large customers with type 1 (consumption greater than 1000 GWh per annum) and 2 (consumption between 100-1000 GWh per annum) meter installations. - Western Power's metrology procedure lists the requirements for check meter installation for type 1 and 2 meters. The requirement for installation of check metering is also described in the Measurement Current and Voltage Transformer Design Guidelines. Findings: CutlerMerz finds that Western Power has complied with this obligation to arrange for a full metering check in accordance with the prescribed requirements in the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
347.	A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure. We determined the following: - Western Power does not utilise partial check metering, and only provides full check metering as detailed in the metrology procedure approved by the ERA. Findings: CutlerMerz finds that Western Power has complied with this obligation to arrange a metering check in accordance with the prescribed requirements in the Metering Code.	A	1
348.	A check metering installation for a metering point must comply with the prescribed requirements.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's high voltage technical design guideline and metrology procedure. We determined the following: - As per the metrology procedure and the high voltage technical design guideline, Western Power maintains check metering as per the requirements listed in Tables 3 and 3a of Appendix 1 of the Metering Code. - The metering technical services team demonstrated automated checks undertaken at check meters with a walkthrough of the metering business system and emails with results of check metering testing. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure check metering installations comply with the prescribed requirements.	A	1
349.	If, under clause 3.14(2), a metering installation uses metering class CTs and VTs that do not comply with the Table 3 or Table 3A in Appendix 1 (as applicable), then the network operator must take the actions specified in order to achieve the accuracy requirements in Table 3 or Table 3A in Appendix 1 (as applicable).	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's meter asset management plan. We determined the following: - The Metering Technical Services Team did not identify any metering installation that uses meter class CT and VTs that do not comply with Table 3 or 3A in Appendix 1 of the Metering Code. - Western Power's metering asset management plan and the metrology procedure lists the requirements for meter installations using class CTs and VTs to be compliant with Tables 3 and 3a in Appendix 1 of the Metering Code. All installations must conform to the metrology procedure which has been approved by the ERA. - Western Power provided an example of CT and VT testing for the East Rockingham RRF project which demonstrated successful accuracy testing of a metering installation using CT and VT equipment. The testing procedure is documented in the metering technical procedure manual. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure meter installations using CTs and VTs comply with the requirements prescribed in Appendix 1 of the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
350.	The network operator must ensure that a Type 1 metering installation to Type 5 metering installation on the network has the facilities and functionality prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's meter asset management plan. We determined the following: - Western Power's metering asset management plan and technical specification for revenue meters outlines the functionality of type 1-5 meters as prescribed by the Metering Code. The Metering Code requires that meters: 1. Have electronic data recording facilities to measure and record interval energy data (including, on and from five-minute settlement commencement, five-minute interval energy data for 5MS meters); and 2. Are capable of separately measuring and recording flows in each direction if bi-directional electricity flows occur; and 3. Includes facilities on site for storing the interval energy data for a period of at least 35 days from and including the day that data is first recorded - Western Power conducts verification of meter vendor tests to ensure meters have functionality prescribed by the Metering Code. Western Power provided evidence of vendor tests which support compliance with this obligation. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that type 1-5 metering installations have functionality prescribed in the Metering Code.	A	1
350A.	Any metering installation on the network that has an interval meter and is not a 5MS meter must have hardware that is capable of measuring and storing five-minute interval energy data. Note: The network operator is not required to have that capability enabled provided that the metering installation is capable of measuring and record 30-minute interval energy data.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's meter asset management plan. We determined the following: - Western Power's metering asset management plan outlines the requirements for new meters to be capable of storing 5-minute interval energy data. - Western Power provided a report detailing the replacement of all type 1 to type 5 meters with AMI meters that are all programmable to record 5-minute interval energy data. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure meter installations have hardware capable of measuring and storing energy data in 5-minute intervals.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
351.	Subject to clause 3.16(2A), the network operator must ensure that a Type 1 metering installation to Type 4 metering installation on the network includes a communications link.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's technical specification for revenue meters. We determined the following: - Inspection of the Western Power technical specification for revenue meters describes the communication link installed in meters required on all type 1-4 metering installations. - The Metering Technical Service Team demonstrated energy usage data stored in the metering business system, logged from type 1-4 meters as identified in the records of the metadata in the metering business system. - Physical inspection of meters at Western Power's meter laboratory identified the communications card that allows data to be logged and downloaded to the metering business system. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure meter installations on the network include a communications link.	A	1
352.	If a device is used as a data logger, the energy data for a metering point on the network must be collated in: · for a 5MS meter on or after five-minute settlement commencement, five-minute metering intervals or sub-multiples of a five-minute metering interval; or · otherwise, 30-minute metering intervals or sub- multiples of a 30-minute metering interval, within the metering installation.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's technical specification for revenue meters. We determined the following: - Inspection of the Western Power technical specification for revenue meters describes the ability of remotely read interval meters in 30- and 15-minute intervals. These meters can be programmed to log data for 5-minute intervals as required. - The 5-minute settlement requirement will not begin until October 2025, at which time Western Power is expected to have replaced all manually read meters with remotely read meters capable of logging energy data in 5-minute intervals, as per the 5 minute settlement meter deployment works planning report. Findings: CutlerMerz finds that Western Power has complied with this obligation to collate energy data in appropriate intervals in accordance with the current requirements of the Metering Code.	A	1
353.	If, under subclause 3.16(3), energy data for a metering point on the network is collated in sub-multiples of a five- minute metering interval or 30-minute metering interval (as applicable), then the network operator must aggregate the energy data into five-minute metering intervals (if clause 3.16(3)(a) applies) or 30-minute metering intervals (if clause 3.16(3)(b) applies) before providing it to a Code participant unless the Code participant agrees otherwise.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure. We determined the following: - Inspection of Western Power's metrology procedure (approved by ERA) and the metering asset management plan describe meter data interval collection period in 30- and 15-minute intervals, with the capability of 5-minute interval collection for remotely read interval meters. - The five-minute settlement requirement will not begin until October 2025, at which time Western Power is expected to have replaced all manually read meters with remotely read meters capable of logging energy data in 5-minute intervals, as per the 5 minute settlement meter deployment works planning report. Findings: CutlerMerz finds that Western Power has complied with this obligation to collate energy data in appropriate intervals in accordance with the current requirements of the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
353A.	The network operator must not install a Type 5 metering installation or Type 6 metering installation on or after 1 January 2022.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure and meter asset management plan. We determined the following: - The Metering Technical Services Team confirmed Western Power has not installed type 5 (manually read interval meter) and type 6 accumulation meters on or after 1 January 2022. - The Western Power metrology procedure, metering asset management plan and 5 minute settlement deployment works planning report specify that only remotely read meter types 1-4 will be used in meter installations and corroborate the explanation provided by the metering technical services team. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure no installation of type 5 or 6 meters on or after 1 January 2022.	A	1
353B.	The network operator must continue to comply with all provisions of this Code applicable to Type 5 metering installations and Type 6 metering installations in respect of Type 5 and Type 6 metering installations installed prior to 1 January 2022.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metrology procedure and revenue meter technical specification. We determined the following: - The metering technical services team confirmed that Western Power continue to maintain compliance in respect of type 5 and 6 meters with the Metering Code. - Type 5 and 6 meters continue to be subject to the in-service accuracy tests as per Western Power's metrology procedure and maintain the performance standards required by the Metering Code and the revenue meter technical specification. Findings: CutlerMerz finds that Western Power has complied with this obligation to continue to meet the obligations required for type 5- and 6-meter installations installed prior to 1 January 2022.	A	1
354.	The metering installation for the connection point must comply with the prescribed wholesale market metering installation requirements if the Electricity Generation and Retail Corporation supplies electricity to a contestable customer at a connection point under a non-regulated contract and in circumstances when, immediately before entering into the contract, the Electricity Generation and Retail Corporation supplied electricity to the contestable customer under a regulated contract.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - Western Power's metering asset management plan and technical specification for revenue meters outlines the functionality of type 1-5 meters as prescribed by the Metering Code. The Metering Code requires that meters: 1. Have electronic data recording facilities to measure and record interval energy data (including, on and from five-minute settlement commencement, five-minute interval energy data for 5MS meters); and 2. Are capable of separately measuring and recording flows in each direction if bi-directional electricity flows occur; and 3. Includes facilities on site for storing the interval energy data for a period of at least 35 days from and including the day that data is first recorded - Western Power conducts verification of meter vendor tests to ensure meters have functionality prescribed by the Metering Code. Western Power provided evidence of vendor tests which support compliance with this obligation. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that meter installations comply with the wholesale market metering installation requirements.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
354A.	Subject to clause 3.14, the network operator must ensure that each 5MS meter complies with clause 3.16 by five- minute settlement commencement. Note: where a connection point associated with a contestable customer or generator has more than one metering installation, each metering installation at that connection point will be a 5MS meter and will be required to comply with clause 3.16 from five-minute settlement commencement.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - The Metering Technical Services Team confirmed that Western Power continue to maintain compliance in respect of type 5 and 6 meters with the Metering Code upon commencement of 5 minute settlement. - The five minute settlement requirement will not begin until October 2025, at which time Western Power is expected to have replaced all manually read meters with remotely read meters capable of logging energy data in 5 minute intervals, as per the 5 minute settlement meter deployment works planning report. - As of August 2023, Western Power has installed approximately half of its metering fleet (600,000 meters) with remotely read type 4 meters capable of reading 5-minute interval data. - Type 5 and 6 meters continue to be subject to the in-service accuracy tests as per Western Power's metrology procedure and maintain the performance standards required by the Metering Code and the revenue meter technical specification. - The Western Power metrology procedure, metering asset management plan and 5 minute settlement deployment works planning report specify that only remotely read meter types 1-4 will be used in meter installations and corroborate the explanation provided by the Metering Technical Services Team. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure all meters comply with requirements set out in the current version of the Metering Code before and after the introduction of 5 minute settlement.	A	1
355.	If reasonably requested by a Code participant, a network operator must provide enhanced technology features in a metering installation.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's emails to its meter vendor. We determined the following: - The metering technical services team explained that requests are typically made by retailers on behalf of customers seeking enhanced functionality from their metering installation. - Requests made by retailers can range from allowing bi-directional flows on new solar connections for an existing metering installation to bespoke arrangement for the customer to monitor voltage and current to enable demand management services. - Western Power provided evidence of an email to a metering vendor requesting enhanced data provision to a customer and a query about information security protocols permitting the sharing of data. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that requests for enhanced technology features are met.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
356.	A network operator may only impose a charge for the provision of metering installations with enhanced technology features in accordance with its applicable service level agreement with the user.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's emails to its retailer. We determined the following: - The commercial services and metering technical services teams advised that Western Power had charged for enhanced metering service during the audit period. - Western Power conducts a process to check charging for enhanced metering services each month. Western Power provided an email request from the retailer disputing the enhanced metering charges raised in April 2023. Western Power reviewed the bill and provided a refund in response to the retailer request. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that charges for enhanced technology features are made in accordance with the service level agreement.	A	1
357.	Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's acceptance testing procedure. We determined the following: - The non-compliance related to meters time drift of meter readings due to degraded batteries that caused the meter's internal clock being unable to accurately keep time, as measured over 1 month. The non-compliance in each year measured by the percentage of failure as a proportion of the number of tests performed was FY2021 0.03%, FY2022 0.79% and FY2023 0.46%. - Monthly reporting of non-compliance due to time drift during the audit period demonstrated effective controls to identify time drift and rectify the non-compliance as necessary. - The metering technical services team identified a number of procedures and validation checks used to detect time drift from data uploaded to the metering business system. This was demonstrated with exception management reports that detail procedures using Western Power's MV90 system to detect time drift. - As per Western Power's inspection and acceptance testing procedure, laboratory testing of meters requires calibration and testing of time drift. - Western Power verifies metering vendors' calibration testing to ensure meters maintain time accuracy as prescribed by the Metering Code. Findings: CutlerMerz finds that Western Power has not complied with this obligation to maintain accuracy of internal time clock as prescribed in the Metering Code.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
358.	If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on-site for storing the interval energy data for the periods prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's revenue meter specification document. We determined the following: - The metering technical services team advised that Western Power requires meter vendors to supply meters capable of storing data for 220 days, as per the technical specification for revenue meters document. - The data is logged and monitored within the metering business system to ensure data meet the requirements in the Metering Code of storing data for 200 days for a metering installation where a communications link has not been installed and 35 days storage for metering installations where a communications link has been installed. Findings: CutlerMerz finds that Western Power has complied with this obligation to include elements and an internal data logger at the same site.	A	1
359.	A network operator providing one or more metering installations with enhanced technology features must be licensed to use, and access, the metering software applicable to all devices being installed and be able to program the devices and set parameters.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's revenue meter specification document. We determined the following: - The metering technical services team advised that meters are able to be programmed to meet specific needs of users, such as current and voltage data for users engaged in demand management services. - The permissions to allow programming of meters is tightly controlled within Western Power, with only a limited number of staff with read and write access to metering software, as detailed in the technical specification for revenue meters document. Findings: CutlerMerz finds that Western Power has complied with this obligation for meter installations to provide enhanced technology features.	A	1
360.	Where signals are provided from the meter for the user or the user's customer, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's Modbus security document. We determined the following: - The Metering Technical Services Team advised that meters are equipped with voltage free contact points that include safety features that enable isolation of signals by relays and electronic buffers to prevent accidental or malicious damage to the meter. - The technical specification for revenue meters document provided by Western Power also describes these features of the meters used by Western Power. - The ability of users to access meter data is also detailed in the Modbus security information document provided by Western Power. Findings: CutlerMerz finds that Western Power has complied with this obligation to prevent accidental or malicious damage to the meter.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
361.	Where signals are provided from the meter for the user or the user's customer, a network operator must provide the user, or the user's customer, with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's revenue meter technical specification document. We determined the following: - The Metering Technical Services Team advised that the technical specification for revenue meters document is provided to customers to describe the signal to enable compliance with the Metering Code that enables the customer to connect a device to the signal output that is compatible with the signal. - This is typically requested by large customers connected via a type 1, 2 or 3 meter type installation. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide sufficient details of meter signals to users.	A	1
362.	If a retailer requests a network operator to install a pre-payment meter at a connection point, then the pre- payment meter must be sufficient to enable the retailer to comply with the retailer's obligations under the Code of Conduct.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - The Metering Installation Team confirmed that no requests to install a pre-payment meter occurred during the audit period. - Western Power operates 12 pre-payment meters across a network that includes approximately 1.2 million meter installations. Findings: CutlerMerz finds that Western Power has complied with this obligation, given no requests have been made to install pre-payment meters.	A	1
363.	If a retailer requests a network operator to replace a pre- payment meter at a connection point with a meter that is not a pre-payment meter, then the network operator must do so in accordance with this Code and the Code of Conduct.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - No requests received by Western Power to replace pre-payment meters, Western Powers metering register indicated it has only 12 pre-payment meters installed. Findings: CutlerMerz finds that Western Power has complied with this obligation, given no requests have been made to install pre-payment meters.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
364.	A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's website content that provides the services apparatus connection scheme and the contractor connection scheme. We determined the following: - Western Power's meter installations are supported by a robust process under the service apparatus connection scheme and the contractor connection scheme, as listed on Western Power's website. The schemes cover registration and authorisation of contractors and an audit of their meter installation jobs to ensure installations are compliant with the Western Australia service installation rules and all obligations under the Metering Code. - Under the scheme, audits are conducted to evaluate work of contractors and the checking of electrical work and electrical installations, and potentially the de-registration of electrical contractors in the event of failure to pass audit requirements. - Contractors are also subject to regulation by the Energy Safety regulator in Western Australia audits - Training and authorisation of independent meter installers and trained and authorised under the WA electrical inspection scheme - The metering installation team indicated that it installs 10% of meters, with accredited electrical contractors responsible for the remaining 90% of the scheme. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure meter installations are carried out by authorised persons.	A	1
365.	A network operator must publish a list of registered metering installation providers, including the prescribed details, and update the list at least annually.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's website. We determined the following: - Inspection of Western Power's website confirmed Western Power maintains a list of registered meter installers that is regularly updated at least annually on its website, as per their metering service provider registration scheme. Findings: CutlerMerz finds that Western Power has complied with this obligation to publish a list of registered metering installation providers, including details as prescribed by the Metering Code.	A	1
366.	A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS. We determined the following: - The metering installations team provided a walkthrough of the MBS to demonstrate collection of standing data and energy data for each metering point on its network through a data visualisation tool which reconciled to the total number of meters (approximately 1.2 million) across Western Power's network. - Western Power also provided an extract from the metering business system in an excel spreadsheet that demonstrated the meta data collected for each metering installation. Findings: CutlerMerz finds that Western Power has complied with this obligation to establish, maintain and administer a metering database containing standing and energy data for each metering point on its network.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
367.	A network operator must ensure that its metering database with its associated links, circuits, information storage and processing systems are secured by devices or methods consistent with a good industry practice (to hinder unauthorised access and enable unauthorised access to be detected).	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS. We determined the following: - The functional support specialist advised that read/write access to the MBS which stores user's energy data is very limited to a select group of Western Power staff. - Evidence of password protection when logging into the metering business system was provided via a sample of the program programming script and a walkthrough of the MBS at a site visit demonstrated the use of passwords to enter the database. - Western Power provided evidence of the forms required to grant access to the metering business database. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that the metering database is secured by devices or methods consistent with good electricity industry practice.	A	1
368.	A network operator must prepare and, if applicable, implement a disaster recovery plan to ensure that it is able, to rebuild the metering database and provide energy data to Code participants within 2 business days after the day of any disaster.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's IT disaster recovery plan. We determined the following: - Western Power provided the disaster recovery procedure document which details the process of responding to a disaster event and keep the business in operation. - The functional support specialist advised that Western Power maintains 2 data centres in undisclosed locations to allow continuation of business in event of a disaster that impacts the primary data centre. - Western Power conducts disaster recovery tests at least once a year, or more if an event occurs throughout the year. Findings: CutlerMerz finds that Western Power has complied with this obligation to prepare and implement a disaster recovery plan to ensure continuity of energy data supplied to users.	A	1
369.	A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS and supporting documents. We determined the following: - The metering installations team provided a walkthrough of the metering business system to demonstrate collection of data listed in compliance with clause 8.3.1 of the Western Australia wholesale electricity market rules. - Western power provided an extract showing the data collected for each meter installation and a data visualisation of meters across its network including a summary of each NMI across the Western Power network, the name of the market participant associated with the meter installation and the quantities associated with each metering installation. - Western Power demonstrated the process of facilitating changes to the identity of market participants, as per the Hansen technical guideline to the MBS, including functionality to apportion metered quantities between sites. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that the MBS complies with the Metering Code and wholesale electricity market rules.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
370.	The standing data for a metering point must comprise at least the items specified.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS and supporting documents. We determined the following: - Western Power demonstrated compliance with screenshots of standing data fields from the metering business system and in person via a walkthrough of the MBS functionality. - WA electricity Market Build Pack Customer Transfer and Standing Data Procedure outlines process for all standing data fields and responses to requests which Western Power has demonstrated compliance with, as per the functionality of the MBS explained in the Hansen technical guide to the MBS. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure the standing data comprises the items specified in the Metering Code.	A	1
371.	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.	5	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS and supporting documents. We determined the following: - Discrepancies between metered data and MBS i.e. Meter not reading properly, mostly relates to estimated or substitute data. - The MBS performs automated checks for corrupt data for remotely read meters and includes checks for energy data collected by manually-read meters as demonstrated in a walkthrough of the data visualisation tool that sources data from MBS. - Western Power batch tests meters in a process that detects errors before deployment. - Western Power has demonstrated a process to test meter if questions raised by retailer/users, as per emails observed. The Metering Technical Services team advised that complaints generally do not come from residential customers just retailers. Findings: CutlerMerz finds that Western Power has complied with this obligation to determine appropriate ways to resolve discrepancies between energy data held in a metering installation and in the MBS.	A	1
372.	A Code participant must not knowingly permit the registry to be materially inaccurate.	5	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS and supporting documents. We determined the following: - Western Power demonstrated compliance with this provision that MBS must not contain data which is materially inaccurate. - The MBS sends automatic notifications on a daily and weekly basis in the form of production quality reports that summarise any non-compliant metering data production. This was demonstrated in a walkthrough of the metering business system's functionality with members of the reading management team. Findings: CutlerMerz finds that Western Power has complied with this obligation with no evidence found that suggests that Western Power has knowingly allowed the MBS to be materially inaccurate.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
374.	If the network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant that is the designated source for the item of standing data under Table 2 in clause 4.3(1) then the network operator must update the registry to address the issue.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examining Western Power's MBS and supporting documents. We determined the following: - Western Power demonstrated compliance with evidence of automatically generated compliance reports (production quality meter data report, model service level agreement monthly compliance report and quarterly compliance report). - Western Power has demonstrated a process to update data once identified as erroneous as per example provided in a screenshot of the MBS showing updates to standing data. - Western Power provided a walkthrough of the process in the metering business system for receiving notifications to change standing data plus alert that data has been changed. Findings: CutlerMerz finds that Western Power has complied with this obligation to update inaccurate data in MBS if identified.	A	1
375.	If a network operator is notified of a change to, or inaccuracy in, an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must determine whether the registry should be updated, and update the registry as required.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Management Teams. We determined the following: - Western Power operates a customer call centre located in Australia that operates 24 hours which takes queries about changes to standing data. - The Reading Management Team advised that analysts at Western Power also monitor data reports which identify irregularities with standing data, as well as automated validation checks on blank fields or incomplete fields of data that is entered into the metering business system. - Western Power provided an email request to update inaccurate standing data that was confirmed by Western Power and subsequently rectified as per the requirement in the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to update standing data that has changed or is inaccurate.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
376.	If standing data for a metering point is updated in the registry, the network operator must, within 2 business days after the update (or such other time as is specified in the applicable service level agreement) notify the update to the current user and each previous user if the updated standing data relates to a period or periods when the previous user was the current user.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's Standing Data Procedure. We determined the following: - The non-compliance relates to not publishing 3,585 (FY2022) and 728 (FY2021) standing data sets within the 2 business days after the data being updated, as prescribed by the Metering Code. Western Power was compliant with this obligation in FY2023. - Western Power maintains a full set of standing data with automated detection identifying when data has changed - The IT issue related to a security configuration within the metering business system that was blocking automated processes. The security configuration that caused the non-compliance has since been rectified. - Western power staff have limited access to the metering business system with only read access and few permissions for writing access on the database in order to maintain appropriate security protocols. - Requests for standing data are made via a web portal and sent via a B2B process from the metering business system. The buildpack provides for the process to send standing data in response to requests from customers/retailers, as per the Western Australian Electricity Market Build Pack Customer Transfer and Standing Data Procedure. Findings: CutlerMerz finds that Western Power has not complied with this obligation to update the MBS within 2 business days after a standing data update.	A	2
377.	A network operator must allow a user who is a retailer or a generator to have local and, where a suitable communications link is installed, remote access to the energy data for metering points at its associated connection points, using a password provided by the network operator that provides 'read only' access.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering technical procedure manual. We determined the following: - The metering technical procedure manual details the access permissions for retailers and generators. The Metering Technical Services Team advised that retailers and generators receive data via a business to business (B2B) protocol that is accessed via a web portal and is password protected. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure read-only remote access to energy data is protected with a password.	A	1
378.	A network operator must allow a user who is a retailer or a generator to have access to data held in its metering database for metering points at its associated connection points, by the prescribed methods, using a password provided by the network operator which provides 'read only' access.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering technical procedure manual. We determined the following: - The metering technical procedure manual details the access permissions for retailers. The metering technical services team advised that retailers and generators receive data via a business to business (B2B) protocol that is accessed via a web portal and is password protected. - A walkthrough provided by the Metering Technical Services Team demonstrated requests from retailers are made via the web portal and a response is generated from data contained in the metering business system. Findings: CutlerMerz finds that Western Power has complied with this obligation to allow user read-only access to energy data with password protection.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
379.	A network operator must have devices and methods in place to ensure that energy data held in its metering installation is secured from unauthorised local or remote access using the methods prescribed	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's internal security protocol documents. We determined the following: - Western Power provided evidence of password protection when logging into the metering business system was provided via a sample of the database programming script at the login screen and a walkthrough of the metering business system at a site visit demonstrated the use of passwords to enter the database. - Western Power provided an internal security protocol diagram outlining password authority matrix on the metering database. - The metering technical services team advised that remote log in to the metering business system was available to Western Power staff with access via a secure Citrix system that dynamically updates a remote access password in addition to the Western Power staff password. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that energy data is secured from unauthorised local or remote access.	A	1
380.	A network operator must have devices and methods in place to ensure that the data held in its metering database is secured from unauthorised local, or remote, access using the methods prescribed.	4	- CutlerMerz arrived at the same findings as in obligation 379, that Western Power has complied with obligation 380 by ensuring that energy data is secured from unauthorised local or remote access via password protection.	A	1
381.	Without limiting subclause 4.8(4), a network operator must ensure that electronic passwords and other electronic security controls are only issued to the specified authorised personnel and otherwise keep its records of electronic passwords, and other electronic security controls, secure from unauthorised access.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's data handling procedure documents. We determined the following: - The Metering Technical Services Team and functional support specialist advised that only a limited number of Western Power staff have access to the MBS. - Western Power provided evidence of password protection when logging into the MBS was provided via a sample of the database programming script at the login screen and a walkthrough of the metering business system at a site visit demonstrated the use of passwords to enter the database. - Western Power provided a document that outlines data handling protocols as per the data owner and data steward process. Only the data steward is permitted to approve data requests and this has been limited to the manager of the Metering Technical Services Team. - All entries into the metering business system are tracked with authorised Western Power personnel's actioned logged in the event that an audit of data is required. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure only authorised personnel are permitted access to passwords and electronic security controls to access meter records.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
382.	A network operator must retain energy data in its metering database for each metering point on its network, including any energy data that has been replaced under subclause 5.24, for at least the periods, and with the level of accessibility, prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Management Teams and examined Western Power's MBS. We determined the following: - Two data centres store metered energy data including actual, deemed actual and substitute estimates that are recorded in the MBS. The Reading Management Team provided a walkthrough of the MBS in person demonstrating the functionality to track the performance of each meter and the record of data of estimates over time. - Western Power stores data for a period of 7 years as per the obligation, demonstrated with a walkthrough of the MBS. - Western Power establishes agreed methods to read meters with retailers in the event actual meter reads are not available. One of these methods is to use historical averages of energy data at a given site. - Meter data is often updated as better data is made available from actual reads and stored in the MBS. Findings: CutlerMerz finds that Western Power has complied with this obligation to retain energy data within the MBS, as prescribed in the Meter Code.	A	1
383.	A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level agreement.	5	CutlerMerz has interviewed key personnel from Western Power's Commercial Services Team and examined Western Power's MBS. We determined the following: - The Commercial Services Team advised that retailer requests are made via a B2B process including the negotiation of services offered in the service level agreement. - Services are stated in the model service level agreement between Western Power and the retailer. Retailer requests and are typically associated with requests for services to be moved from unregulated services to be classified as regulated services. - Western Power maintains a negotiated service category to provide an open service offering of services not captured in the current model service level agreement. Findings: CutlerMerz finds that Western Power has complied with this obligation to use all reasonable endeavours to accommodate users obtaining a metering service in negotiation of a service level agreement.	A	1
384.	Without limiting subclause 5.1(1), a network operator must: · expeditiously and diligently process all requests for a service level agreement; · negotiate in good faith with a Code participant regarding the terms for an agreement; and · to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	5	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's emails to a retailer. We determined the following: - Western Power provided an email trail with a retailer request for an additional service level agreement. The email exchange demonstrated that Western Power responded expeditiously and diligently to all the retailer requests and processed changes to the service level agreement to reflect the retailer request. Findings: CutlerMerz finds that Western Power has complied with this obligation to process requests in respect of a service level agreement, in accordance with the requirements listed in Clause 5.1(2) of the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
385.	A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database by no later than 2 business days after the date for the scheduled meter reading for the metering point (or such other time as is specified in the applicable service level agreement).	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - The non-compliance related to meter energy data not being recorded and transferred to the metering business system database within the prescribed timeframes of 2 business days after the date of the scheduled meter read as per the Metering Code. The non-compliance in each year of the audit period was: FY2021 4.22% of basic scheduled meter readings 7.75% of Type 5 manually read interval meter readings FY2022 38.38% of basic scheduled meter readings 24.83% of Type 5 manually read interval meter readings FY2023 3.23% of basic scheduled meter readings 2.06% of Type 5 manually read interval meter readings - The reading operations team advised that the non-compliance over the audit period was heavily influenced by the COVID-19 pandemic and the availability of meter readers not responding to work requests, and border closures stifling the movement of staff available for meter reading. - Western Power expects that the opening of borders and higher number of available meter reading personnel will improve compliance outcomes in the future for this obligation. Future compliance with this obligation is expected to also be supported by the rollout of new type 4 remotely read meters will enable more automated meter reading capabilities that do not rely on staff to physically read meters and reduces the population of manually read meters for a given number of meter reading staff. Findings: CutlerMerz finds that Western Power has not complied with this obligation to obtain and transfer energy data from the meter installation to the MBS no later than 2 business days after the scheduled meter reading. with this obligation to ensure that each metering installations meets all the requirements in Appendix 1 of the Electricity Industry Metering Code. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 1/2023: CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[7]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.	B	2

[7] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
385A.	Energy data obtained and transferred under clause 5.3(1) must include: · for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point; and · on and from five-minute settlement commencement, five-minute interval energy data in respect of 5MS meters.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's meter asset management plan. We determined the following: - The reading operations team provided a screenshot of meter installation details in the MBS that showed the separate fields to record import and export flows for metered energy data. - Inspection of the metering asset management plan and technical specification document for revenue meters demonstrated the capability of Western Power's meters to read and record 5 minute interval data. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure metering point are capable of recording bi-directional electricity flows and 5 minute interval energy data on and from commencement of 5 minute settlement commencement.	A	1
385B.	Notwithstanding the provisions of a service level agreement, on and from weekly settlement commencement, consecutive dates for a scheduled meter reading for a metering point on the SWIN must be no more than one week apart, except where the metering installation for the metering point has an accumulation meter.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's website. We determined the following: - The reading operations team confirmed that meter reads occur bi-monthly, or monthly for some customers, as per the Western Power website. - The reading operations team advised that remotely read meters download meter data daily, complying with the requirement that meter reads on the SWIN must be no more than a week apart. Findings: CutlerMerz finds that Western Power has complied with this obligation for meter reading schedules to be conducted as prescribed by the Meter Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
386.	A network operator must, for each meter on its network, at least once in every 12-month period undertake a meter reading that provides an actual value that passes the validation processes in Appendix 2.	1*	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS and website. We determined the following: - The non-compliance relates to not undertaking a meter reading for every meter on the Western Power network at least once within 12 months. The number of meters unread was 15,093 in FY2023, 8,408 in FY2022, and 13,693 in FY2021. - Western Power conducts an annual read process that seeks customer contact within 2 months of the 12-month deadline to read the meter. - The main reason for these consistent non-compliances is the lack of access to customer sites to manually-read meters, where customers directly refuse access and Western Power staff may face safety risks in trying to enter the site. Western Power liaise directly with the police to discuss ways to access these sites safely. Some customers are permitted to send an photo of a meter which is examined by Western Power staff, from which the meter reading is taken. This arrangement is in places where it is not feasible for Western Power to send out a meter reader and must be approved by the retailer, as per the guidance listed on Western Power's website. - Western Power's continued rollout of AMI meters is expected to increase compliance with this obligation. However, Western Power may have to resort to developing a strategy with police to forcibly enter sites and perform a meter replacement where site access is continually blocked and entering the property creates a safety risk without police escorts. - The Metering Technical Services Team provided a walkthrough of a data visualisation dashboard that provides automated alerts to prompt meter reading well before deadlines. The data dashboard is monitored and updated daily, as meter reads are entered into the metering business system. The dashboard is a relatively new tool and has been refined over the last 2.5-3 years. Findings: CutlerMerz finds that Western Power has not complied with this obligation to undertake meter reading that passes the validation processes outlined in Appendix 2 of the Meter Code. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 1/2023: CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[8]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.	B	2

[8] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
387.	The meter reading referred to in clause 5.4(1) must not be undertaken by the customer associated with the meter, and must be undertaken by a person who is employed or appointed by the network operator and who is suitably skilled in accordance with good electricity industry practice to carry out meter readings.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's website. We determined the following: - Self reads made by customers are not accepted by Western Power as validated meter reads under clause 5.4(1) of the Metering Code. - Western Power provides training to meter reading personnel to ensure meter reading is compliant with the validation processes required in Appendix 2 of the Metering Code. - The reading operations team advised that new rules are expected to be introduced by the energy Minister to encourage installation of new remotely read AMI meters and provide that customers not allowing site access will be forced to pay a higher cost of a special meter read fee compared to a basic meter read. Findings: CutlerMerz finds that Western Power has complied with this obligation for meter reading to be performed by a suitably skilled person in accordance with good electricity industry practice.	A	1
389.	Subject to subclause 5.5(2A)(b), a network operator may impose a charge for the provision of data, but only if · a user has requested the energy data to the extent permitted by, and in accordance with the applicable service level agreement between it and the user; and · if a customer has given a direction under subclause 5.17A(1), in accordance with the prescribed conditions.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's model service level agreement. We determined the following: - The reading management team advised that the provision of data in most instances is provided free of charge. The service to verify meter data attracts a charge as per schedule 5 of the model service level agreement. - Requests for data are typically made by third parties such as aggregators, solar installers or organisations conducting studies on energy usage. The request examined did not impose a fee for the data provided and followed Western Power's EDAAS procedure for processing data requests from third parties. Findings: CutlerMerz finds that Western Power has complied with this obligation to impose charges for data provision in accordance with the service level agreement under the conditions prescribed in the Metering Code.	A	1
390.	A network operator must not impose a charge for the provision of standing data and for the provision of energy data if another enactment prohibits it doing so.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Management Team and examined Western Power's model service level agreement and email request for data. We determined the following: - The reading management team advised that Western Power had not imposed a charge for the provision of standing data and energy data if another enactment prohibits it doing so. - The reading management team advised that data is transferred to retailers via a business to business (B2B) process that is automated in part and results in low cost per transaction, as per the Hansen technical guide examined. - Inspection of the model service level agreement schedule 5 did not list a fee for the provision of standing or energy usage data. The Western Power response to a request for data examined did not discuss a fee for the provision of energy usage data. Findings: CutlerMerz finds that Western Power has complied with this obligation not to impose for the provision of standing data and observed request for energy data.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
391.	Subject to subclause 5.6(2), a network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO within the timeframes prescribed in subclause 5.6(1)(2).	1*	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - The non-compliance related to the provision of validated metered data within prescribed timeframes, affecting 1.28% in of meter reads and 37 market participants in FY2023, 2.11% of meter reads and 39 participants in FY2022 and 3.87% of meter reads and 17 retailers in FY2021. - Western Power has automated processes to collect and validate data and recently employed a data monitoring dashboard which is used to interrogate large volumes of meter reads for unusual customer consumption patterns. The Dashboard is updated daily and includes a visualisation of meter reading data including identifying locations on a geographic map via GPS. - Western Power run 2 collections of metered data per day, one at 5.30am and another at 4.30pm. This is provided to AEMO before 5pm in the NEM 12/13 files - Process is more automated for remotely read meters with data communicated via communication networks and downloaded daily to the MBS. Energy data taken from manually read meters is logged on an electronic device and uploaded and manually-read meters data actual/substitute reads required for type 5/6 manually read meters. - Western Power's continued rollout of AMI meters is expected to increase compliance with this obligation. - The Metering Technical Services Team provided a walkthrough of a data visualisation dashboard that provides automated alerts to prompt meter reading and identify validation failures well before deadlines. The data dashboard is monitored and updated daily, as meter reads are entered into the MBS. The dashboard is a relatively new tool and has been refined over the last 2.5-3 years. - Western Power continue to refine the automated validation process in the metering business system with better management of security configurations that have previously stopped automated validation processes working properly. The Metering Technical Services Team also advised that an increase in Western Power's data hosting capacity is expected to improve validation testing times for remotely read meters. Findings: CutlerMerz finds that Western Power has not complied with this obligation to provide validated energy data within the timeframes prescribed under the Meter Code. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 1/2023: CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[9]. Where Western Power is implementing other measures to improve compliance, CutlerMerz recommends that Western Power monitor the implementation of these measures and conducts periodic reviews of the improvement to compliance with the obligation.	B	2

[9] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
391A.	A network operator must provide validated, and where necessary substituted or estimated, interval energy data for a metering point to AEMO before 5pm on the first business day after the network operator obtains energy data for the metering point under clause 5.3(1)(a), or such other time as agreed in writing.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS specification document. We determined the following: - Western Power has automated processes to collect and validate data and recently employed a data monitoring dashboard which is used to interrogate large volumes of meter reads for unusual customer consumption patterns. The Dashboard is updated daily and includes a visualisation of meter reading data including identifying locations on a geographic map via GPS. - Western Power runs 2 automated collections of metered data per day, one at 5.30am and another at 4.30pm. This is provided to AEMO before 5pm in the NEM 12/13 files - The process is more automated for remotely read meters with data communicated via communication networks and downloaded daily to the metering business system. Energy data taken from manually read meters is logged on an electronic device and uploaded and manually read meters data actual/substitute reads required for type 5/6 manually read meters. - Procedure is described in Western Power's MBS specification document. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide interval energy data to AEMO before the 5pm on the first business day after the energy data is obtained from the metering point.	A	1
391B.	Energy data provided under clauses 5.6(1) and 5.6(3) must include: · for a metering point at which bi-directional electricity flows occur, a separate measurement of each of the electricity production and the electricity consumption at that metering point; and · on and from five-minute settlement commencement, five-minute interval energy data in respect of 5MS meters.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS specification document. We determined the following: - Western Power runs 2 automated collections of metered data per day, one at 5.30am and another at 4.30pm. This is provided to AEMO before 5pm in the NEM 12/13 files - The process is more automated for remotely read meters with substitute values being required and actual/substitute reads required for type 5/6 manually read meters. This procedure is described in the Hansen technical specification document for the MBS. - Western Power has the facility to separately measure bidirectional flows within the metering data management system in accordance with NMI allocation rule unit of measures. Findings: CutlerMerz finds that Western Power has complied with this obligation and in the form prescribed by the Meter Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
392.	If a replacement energy data value is inserted in a metering database for a metering point, the network operator must provide replacement energy data to the user for the metering point and the IMO within the timeframes prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Metered data often replaced by Western Power as better information becomes available i.e.. remotely read meters scan for updates every 4 hours. - Actual reads are the best quality data, followed by substitute reads that are estimates using approved methods as per the metrology procedure, Metering Code and agreement with retailers - Western Power provided screenshots of the MBS and a walkthrough of the database functionality demonstrating the process of substitute reads being replaced by actual read data as it becomes available. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide replacement energy data within the timeframes prescribed by the Metering Code.	A	1
393.	A network operator must provide a user with whatever information the network operator has that is necessary to enable the user to comply with its obligations under the Code of Conduct, within the time necessary for the user to comply with the obligations.	4	CutlerMerz has interviewed key personnel from Western Power's Commercial Services Team and examined Western Power's MBS specification document. We determined the following: - Western Power provides a number of means to provide users with energy data as permitted by the verification of consent. - The Hansen MBS specification document outlines B2B, email and web portal communication protocols which allow for automatic populating of data in the MBS with an ability to provide data via these processes in accordance with the Meter Code. Western Power also allows for energy data requests via telephone or fax. - The Commercial Services Team advised that requests for data can range from retailer requests to enable de-energisation or re-energisation of a small use customer. Requests for energy data are typically made by the Clean Energy Regulator who collects anonymised data to understand energy usage pattens. AEMO also routinely makes requests for data to Western Power. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide retailers with information to fulfill obligations under the Code of Conduct.	A	1
394.	A network operator must provide standing data, provided to or obtained by it under this Code, to users where required to do so under any enactment.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - As per the obligation, Western Power has provided evidence of standing data sent in response to request by external users i.e.. AEMO, Energy Policy WA or the clean energy regulator. - Enactment typically refers to a request made by one of these government or private bodies. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide standing data under enactment from users.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
395.	A network operator must provide a subset of the standing data to a retailer in accordance with the provisions of Annex 4 of the Customer Transfer Code.	4	CutlerMerz has interviewed key personnel from Western Power's Commercial Services Team and examined Western Power's standing data procedure document. We determined the following: - Western Power provides standing data as per the procedure outlined in the customer transfer and standing data procedure - Western Power provided a sample of a standing data request with all available information provided as per the standing data requirements in Annex 4 of the Customer Transfer Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide standing data in accordance with Annex 4 of the Customer Transfer Code.	A	1
396.	If a transfer occurs at a connection point, then within 2 business days after the transfer date, as defined in the Customer Transfer Code, the network operator must provide the incoming retailer with a copy of the standing data for each metering point associated with the connection point.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's standing data procedure document. We determined the following: - Western Power provides standing data as per the procedure outlined in the customer transfer and standing data procedure - Western Power provided an email of a standing data sent to the retailer to fulfill a customer transfer within 2 business days of the transfer, as per the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide standing data within the prescribed timeframes to a retailer receiving a customer transfer.	A	1
397.	If a user gives a network operator an energy data request for a metering point in accordance with the communication rules, and the energy data request relates only to a time or times for which the user was the current user at the metering point, then the network operator must provide a user with a complete set of energy data for the metering point within the timeframes prescribed.	1*	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - The non-compliance relates to not providing energy data within 2 business days of the request due to incorrect data configuration within internal systems. The non-compliance affected 0.12% of requests to provide energy data in FY2022 only. - Requests and responses for data follow an automated B2B process are made as per communication protocols in the build pack - Western Power produces a monthly compliance report is produced to monitor requests and responses for data - A walkthrough of the MBS has revealed data security configuration improvements where the security program feature prevented requests being automatically processed on time. The fix to the security configuration may mitigate future compliance breaches of this obligation. Findings: CutlerMerz finds that Western Power has not complied with this obligation in relation to providing energy data within 2 business days of the request date.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
398.	If the current user for a metering point gives the network operator a standing data request for the metering point in accordance with the communication rules then the network operator must: · provide the current user with a complete current set of standing data for a metering point; and · advise whether there is a communications link for the metering point, within 2 business days after the receipt of the request.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Western Power has demonstrated compliance with standing data requests, as per a sample of responses provided. - Western Power maintains a repository of standing data within the MBS, available to be provided on request. - Requests and responses for data follow an automated B2B process as per communication protocols in build pack. - Western Power produces a monthly compliance report is produced to monitor requests and responses for data. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide responses to standing data requests in accordance with the Metering Code.	A	1
399.	If a user makes a bulk standing data request, the network operator must in accordance with the communication rules, acknowledge receipt of the request and provide the requested standing data within the timeframes prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS technical specification document. We determined the following: - Western Power must in accordance with 5.14(3) and the communications rules, acknowledge receipt of user bulk standing data request and provide the requested standing data no later than 10 business days after receipt of request. - Bulk Standing data provided via B2B transaction, Western Power provided evidence of information request for a bulk standing data request and response within the prescribed timeframe of 10 business days after receipt of the request. - Western Power demonstrated the automated system to receive and send information via a B2B process that enables bulk standing data requests with the Hansen technical guide to the MBS. Findings: CutlerMerz finds that Western Power has complied with this obligation to acknowledge and reply to bulk standing data requests within the prescribed timeframes in the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
400.	If a network operator provides energy data to a user or the IMO it must also provide the date of the meter reading in accordance with the requirements specified.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS technical specification document. We determined the following: - Western Power provides metered data to AEMO via NEM 12 and 13 files sent daily once at 5.30am, then another at 4.30pm that replaces meter reads with more accurate metered data, if available. - Substitution methods employed by Western Power are compliant with the Metering Code. - AMI data is downloaded daily and regularly refreshed every 4 hours to check for updates of more accurately read data - Meter reads are timestamped and are either remotely read with data automatically populated from meters to MBS, or manually read by meter reader with data recorded via digital FC300 and FT100 handheld devices that transfer data to MBS. - Western Power has provided evidence to show transfer of NEM12/13 files within the audit period. - A walkthrough of the MBS at Western Power's premises showed substitution of meter read data where better data available and timestamped data of readings Findings: CutlerMerz finds that Western Power has complied with this obligation to provide users with energy data that is date-stamped in accordance with the requirements in the Metering Code.	A	1
403.	A network operator must provide data for a metering point from its metering database to a person if (and to the extent that) the customer associated with the metering point gives the network operator a direction to do so that complies with subclause 5.17A(2).	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Verifiable consent is provided by a retailer via the Energy Data Authorisation System (EDAS) via Western Power's web portal and noted in the MBS. - Western Power undertakes a process to annually check in with customers to ensure their circumstances for providing consent have not changed. - Requests for data are typically made by Government departments and Universities, and Western Power typically responds by compiling and anonymising data to protect the identity of customers. - A walkthrough of the MBS by the Metering Technical Services Team demonstrated the process of verifiable consent from web portal via the EDAS system Findings: CutlerMerz finds that Western Power has complied with this obligation to provide data with verifiable consent in accordance with the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
404.	A network operator must comply with a direction under subclause 5.17A(1) within the timeframes prescribed.	1*	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - The non-compliance relates to energy data not provided within the prescribed timeframe of no later than 10 business days after the direction is received. - Compliance with this obligation improved during FY2023, with only 0.21% of responses to directions were not provided within the prescribed timeframes. This compared to 9.33% in FY2022 and 1.3% in FY2021. - Western Power maintains a process to receive requests via a web portal and other forms of electronic communications including email. - The non-compliance has been addressed with improvement in ICT security configuration that prevented direction being received by Western Power. This security protection was fixed so future directions would not be blocked as demonstrated by an IT job logged in internal systems. - Western Power's MBS and Energy Data Authorisation System (EDAS) provides an automated method of delivery of energy data upon direction. Findings: CutlerMerz finds that Western Power has not complied with this obligation to provide energy data within the prescribed timeframes of the Metering Code.	A	2
409.	A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user within the timeframes prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Readings Management Teams and examined Western Power's MBS technical specification document. We determined the following: - The Readings Management Team confirmed that the MBS provides an automated response to give notice to the user acknowledging customer attributes, site attributes within 1 business day after receiving information. Evidence of confirmation notifications within the prescribed timeframes were provided by Western Power and examination of the Hansen technical specification of the MBS confirmed automated processes for customer data provision. Findings: CutlerMerz finds that Western Power has complied with this obligation to give notice to users acknowledging receipt of customer attributes within the timeframes prescribed in the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
411.	A network operator must, by not later than 6 months after the date this Code applies to the network operator, develop, in accordance with the communication rules, an Energy Data Verification Request Form.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Western Power provided evidence of a verification request form listed in their system that was available to customers throughout the audit period. - Western Power developed a form through the web portal via a B2B system that provides ability to transact through an automated process with retailers sending and receiving data that verifies data by flagging blank mandatory fields that should be mandatory to populate via the MBS. Western Power provided a walkthrough of the MBS functionality on-site. - Western Power maintains a web portal user guide that details all forms provided via the web portal - Western Power maintains compliance with communications protocols as per the build pack which also details transfer of data verification requests, customer transfer and standing data requests. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide an energy data verification request form.	A	1
412.	An Energy Data Verification Request Form must require a Code participant to provide the information prescribed.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Western Power demonstrated that the energy data verification response can provide the NMI and checksum associated with data, reason for the request start/end date and time of period of requested data, also the metering date to which the requests relates throughout the audit period. - Western Power developed a form through the web portal via a B2B system that provides ability to transact through an automated process with retailers sending and receiving data that verifies data by flagging blank mandatory fields that should be mandatory to populate via the MBS. Western Power provided a walkthrough of the MBS functionality on-site. Findings: CutlerMerz finds that Western Power has complied with this obligation for code participants to provide the information prescribed by the Metering Code via an energy data verification request form.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
413.	If a Code participant requests verification of energy data under subclause 5.20(3), the network operator must, in accordance with the metrology procedure: · subject to subclause 5.20(5), use reasonable endeavours to verify energy data; and · inform the requesting Code participant of the result of the verification and provide the verified energy data to that Code participant within the timeframes prescribed.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Operations Teams. We determined the following: - The non-compliance related to a failure to verify energy data within 5 business days in relation to manually-read meters. - Compliance with this obligation improved during FY2023, with 8.69% of requests for verified energy data not provided within the prescribed timeframe, compared to 19.65% in FY2022 and 31.16% in FY2021. - Improved compliance over recent years since introduction of AMI, and the accelerated rollout of these meters is expected to increase the speed that data can be verified and provide a timely response to meter verification requests. - An additional ICT solution is being developed to enhance the scope of automation in the validation process, including upgrade of data hosting capacity and better management of security configurations that can block automated processes in order to improve compliance with this obligation. The ICT solution is expected to be implemented in late 2025. - The Reading Operations Team advised that the non-compliance over the audit period was heavily influenced by the COVID-19 pandemic and the availability of meter readers not responding to work requests, and border closures stifling the movement of staff available for meter reading. Findings: CutlerMerz finds that Western Power has not complied with this obligation to verify energy data within the timeframes prescribed by the Metering Code. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 5/2023: Where the rollout of AMI will improve compliance with this obligation, CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[10]. Where the rollout of AMI will not improve compliance with this obligation, CutlerMerz recommends that Western Power review its current internal processes and their implementation to improve compliance with the prescribed timeframes.	B	2
414.	A network operator must comply with any reasonable request under subclause 5.21(1).	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined a process documenting the substitution process. We determined the following: - The Metering Technical Services Team advised that under the model service level agreement, retailers typically raise requests to test or audit the accuracy of metering installation, energy data and standing data for a metering installation, on behalf of smaller customers. - Western Power provided an example with screenshots of meter read review and substitution process in a document, demonstrating compliance with this obligation of the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to comply with reasonable requests of customers from a sample of observed requests.	A	1

[10] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
415.	A test or audit under subclause 5.21(1) is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Management Teams. We determined the following: - The non-compliance related to meter tests not being conducted within the timeframe prescribed in the model service level agreement. The non-compliance over the period affected 41 services requested in FY2021, 46 services requested in FY2022, and 60 services requested in FY2023. - The Metering Technical Services and Reading Management Teams advised that the non-compliance related to failing meters with 10 year old network interface cards malfunctioning, resulting in interference with transmission of metered energy data. - The continued rollout of new AMI remotely read meters to replace older meters is expected to raise compliance performance with greater use of automated processes to collect, validate and send data. Western Power is undertaking an upgrade of data hosting capacity through the Utility IQ system and the field collection system that will enable greater use of remote service to enable higher quality testing of metered energy data via the current MV90 communication system. The rollout of AMI meters is expected to be complete by 2027 and is expected to improve compliance with this clause. The pace of the replacement program is adequate consider the scale of the replacement program across Western Power's metering fleet. Findings: CutlerMerz finds that Western Power has not complied with this obligation to conduct meter tests within the timeframe prescribed in the model service level agreement. We find that, until the implementations of the measures identified by Western Power to improve its compliance are completed, that its controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 5/2023: Where the rollout of AMI will improve compliance with this obligation, CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[11]. Where the rollout of AMI will not improve compliance with this obligation, CutlerMerz recommends that Western Power review its current internal processes and their implementation to improve compliance with the prescribed timeframes.	B	2
418.	A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	4	CutlerMerz has interviewed key personnel from Western Power's Commercial Services Team. We determined the following: - The commercial services team advised charging for testing of the metering installation and auditing of metered energy data is a regulated service provided at a fixed fee as per schedule 5 of the model service level agreement. Additionally, Western Power send a monthly report to the retailer outlining all services provided for the month, also outlining the performance standard achieved. Findings: CutlerMerz finds that Western Power has complied with this obligation to charge for meter testing in accordance with the model service level agreement.	A	1

[11] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
419.	Any written service level agreement entered into under subclause 5.21(7) must include a provision that no charge is to be imposed if the test or audit reveals a non- compliance with this Code.	4	CutlerMerz has interviewed key personnel from Western Power's Commercial Services Team. We determined the following: - The Commercial Services Team confirmed that Western Power's billing system is configured not to issue charges for auditing and inspection services if a meter has failed. Findings: CutlerMerz finds that Western Power has complied with this obligation and found no evidence of charging for auditing and inspection services if a meter has failed.	A	1
420.	If a test or audit shows that the accuracy of the metering installation or information from the meter associated with the metering installation does not comply with the requirements under this Code, the network operator must: · advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors; and · must restore the accuracy of the metering installation in accordance with the applicable service level agreement.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan and metrology procedure. We determined the following: - Western Power provided tests from the meter laboratory assessing the accuracy of meter reading from a sample of the total meter population. - Western Power provided examples where meters failed accuracy tests, the retailer was advised of: The error detected The expected duration of the error Western Power actions to remedy the error to restore the accuracy of the metering installation. - As per the metering asset management plan and the metrology procedure, when meters fail accuracy tests, Western Power maintains a policy to replace defective meters. Findings: CutlerMerz finds that Western Power has complied with this obligation to advise affected parties and restore a meter installation which has become inaccurate.	A	1
421.	The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - Western Power's metering fleet does not have stored correction data error capabilities. There were therefore no compliance breaches in relation to altering stored error data. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
422.	A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 2 and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures set out in Appendix 3.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - Data validation requests for residential customers are logged in the MBS with automated validation checks. - As the rollout of new remotely read AMI meters further progresses, the coverage of these automated checks will also cover a wider range of residential customers and reduce processing time. - Larger customers' data measured by meter types 1-3 is subject to additional scrutiny through the use of check meters which separately record metered energy usage in addition to the revenue meters. Larger customer's meters are equipped with alarms provided by vendors that trip when check and revenue meters are not synchronous. Validation process is automated for these large customers which cover zero values, null data fields, meter alarms (power failure, VT failure, pulse overflow, CRC error and time tolerance), validation of load profile data, process to validate where no check meter exists, and time synchronisation. Findings: CutlerMerz finds that Western Power has complied with this obligation to validate energy data in accordance with Appendices 2 and 3 of the Metering Code.	A	1
423.	The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy in accordance with subclause 3.13.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - Western Power applies check metering to all large customer sites and only applies full check metering services and does not provide partial check metering service. - Western power provided screenshots within the MBS showing the incidence of some differences between check and revenue meter reads as per a daily meter verification report. - Where material discrepancies existed between check and revenue meters, meter readings are investigated and appropriately updated with replacement of meters if found to be providing erroneous data, as per the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to check metering to validate energy data in accordance with the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
424.	If a check meter is not available or energy data cannot be recovered from the metering installation within the time required under this Code, or if clause 5.22(7) applies, then the network operator must prepare substitute values using a method contained in Appendix 3 (or in the case of a substitution under clause 5.22(7), a method contained in the metrology procedure) and agreed where necessary with the relevant Code participants.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Western Power uses methods compliant with substitution methods outlined in Appendix 3 of the Metering Code including historical averages, or node-based data where actual meter read data is unavailable. Western Power noted that node-based data is rarely used. - Western Power outlined the substitution process with a walkthrough of its metering business system on premises, as well as screenshots from the system showing the use of substitute meter reads that complies with the Metering Code. - Western Power provided evidence of agreed meter reading methods between retailers and Western Power. Findings: CutlerMerz finds that Western Power has complied with this obligation to use substitution methods outlined in Appendix 3 of the Metering Code.	A	1
425.	If a network operator detects a loss of energy data or incorrect energy data from a metering installation, it must notify each affected Code participant of the loss or error within 24 hours after detection.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Western Power maintains compliance in sending metered data to AEMO via NEM 12/13 files which contains settlement data that can be used to verify loss of energy at customer sites. - Western Power has provided evidence of NEM 12/13 file transfer with screenshots of the MBS. - Western Power undertakes a communication protocol to let affected customers know of the detection of loss or incorrect energy data. - Remotely read meter data is checked daily to detect errors. In the event errors or loss of energy data is detected, meters are replaced, as per the evidence provided by Western Power. - A walkthrough of the MBS demonstrated how Western Power systems are automatically configured to detect loss of energy to customer, and then to notify the customer. Findings: CutlerMerz finds that Western Power has complied with this obligation to detect loss of energy data or incorrect energy data within 24 hours after detection.	A	1
426.	Substitution or estimation of energy data is required when energy data is missing, unavailable or corrupted, including in the circumstances described in this subclause.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Management Teams and examined Western Power's MBS. We determined the following: - The Reading Management Team advised that Western Power conducts an automated detection of missing, unavailable or corrupted data through the MBS. - Data substituted as per examples provided by Western Power through in-service testing of meters already installed. - Evidence of substitute values provided in meter test results and with screenshots of substitute recorded next to energy usage data in the MBS. Findings: CutlerMerz finds that Western Power has complied with this obligation to apply substitution of energy data when energy data is missing.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
427.	A network operator must review all validation failures before undertaking any substitution.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Validation is performed by Western Power through an automated process for remotely read AMI meters that check for higher quality meter reads every 4 hours, and update data with the highest quality reading at the time. - Western Power use a data visualisation tool to review validation failures of automated process that detect missing, unavailable or corrupted data through the MBS, as demonstrated at a walkthrough of the system at Western Power's premises. Findings: CutlerMerz finds that Western Power has complied with this obligation to review validation failures before undertaking a substitution of metered energy data.	A	1
428.	If a network operator determines that there is no possibility of determining an actual value for a metering point, then the network operator must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's MBS. We determined the following: - Western Power undertakes substitution methods for meter reads outlined in the metrology procedure compliant with the Metering Code Appendix 3. - Substitutions are made after validation checks are performed as per the readings management documentation provided. Exception status of actual and substitute reads are tracked within the MBS. Findings: CutlerMerz finds that Western Power has complied with this obligation to use substitution values where actual values are unavailable.	A	1
429.	If a network operator has designated a deemed actual value for a metering point then the network operator must: · repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point; and · subclauses 5.24(3(c) and 5.24(4) apply in respect of the estimated or substituted value which was designated to be the deemed actual value.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's metering asset management plan. We determined the following: - The metering asset management plan outlines Western Power's process to replace meters if a deemed value was designated to a metering site. - The reading management team and Metering Technical Services Team advised that deemed actual values can be estimated based on a historical average of energy data values, or based on similar sites within an area (node). - Deemed actual values are used by Western Power when accumulation meters are damaged or unreadable, or if the data logger on an interval meter is damaged, destroyed or faulty. Western Power's rollout of remotely-read AMI meters to replace older meter types is expected to result in more actual reads of energy data. Findings: CutlerMerz finds that Western Power has complied with this obligation to replace a meter that is damaged and applied a substitute value in accordance with the Metering Code.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
430.	If a network operator uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's meter reading process document and MBS. We determined the following: - Western Power provided evidence of the process to substitute meter reads with better available data in procedure documents. - Western Power provided actual and substitution reads, as flagged in the MBS. - Through examination of records, it is apparent that deemed actual values were estimated as per agreements with retailers and in accordance with the Metering Code Appendix 3. Findings: CutlerMerz finds that Western Power has complied with this obligation to use the best quality data available for meter reading, replacing meter read data as needed, in accordance with good electricity industry practice.	A	1
431.	If a network operator uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	4	- CutlerMerz arrived at the same findings as in obligation 430, that Western Power has complied with obligation 431 to use the best quality energy data available for meter reading.	A	1
432.	If a network operator uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available (second value), then the network operator must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.	4	- CutlerMerz arrived at the same findings as in obligation 430, that Western Power has complied with obligation 432 to use the best quality energy data available for meter reading.	A	1
433.	A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced under subclause 5.24.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's emails to retailers. We determined the following: - Western Power demonstrated consideration of retailer requests for estimated or substituted values to be replaced via a sample of emails from retailer. Findings: CutlerMerz finds that Western Power has complied with this obligation to consider retailer requests for estimated or substituted meter reads.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
434.	A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.	1*	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services and Reading Management Teams and examined Western Power's MBS. We determined the following: - The Meter Reading Management Team advised that an inquiry through the Ombudsman raised issue of actual meter reads incorrectly published as actuals when in fact were substitution meter reads. The error resulted from an analyst incorrectly manually over-riding a value generated from an automated energy data collection process. - The non-compliance affected 211 customers in FY2021, 213 customers in FY2022 and no breaches in FY2023 with no breaches of this obligation since the manual over-ride issue was identified. - The auditing feature within the MBS identified staff member responsible for change and the staff member was required to undertake training in response to error. Findings: CutlerMerz finds that Western Power has not complied with this obligation to ensure the accuracy of estimated energy data in accordance with the metrology procedure.	A	2
436.	If a network operator makes an election under subclause 5.28 in respect of a network, then, (unless the election is terminated under the meter data agency agreement) the parties must undertake the activities prescribed, as applicable.	4	Obligations 436 to 440. CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team. We determined the following: - The meter data manager confirmed no election was made by Western Power in respect of these obligations. - Western Power always has the responsibility of the meter agent and Western Power owns all the meters. The WEM procedure requires that Western Power is always the agent. - As Western Power owns the meter and controls the meter data, Western Power does not elect for any other entity to be the metering data agent. Findings: CutlerMerz makes no findings as no activity occurred with respect to these obligations over the audit period.	N/P	N/R
437.	If a network operator makes an election under subclause 5.28 in relation to the network, then the parties must enter into an agreement in relation to the network, which must deal with at least the matters prescribed.	4		N/P	N/R
438.	If a network operator makes an election under subclause 5.28 in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation.	4		N/P	N/R
439.	For each non-compliant metering installation notified under subclause 5.31(1)(b), the electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.	4		N/P	N/R
440.	Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation under subclause 5.34(1) must not exceed the amounts prescribed.	4		N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
441.	A network operator must for the year ending on each 30 June, prepare a report setting out the information listed in subclause 5.37(2) for each metering service it was requested during the year to provide or scheduled during the year to carry out.	4	Obligations 441 to 445. CutlerMerz has examined Western Power's Annual Compliance Reports to the Minister. We determined the following: - The regulatory compliance team confirmed with emails to the ERA and the Minister that the annual Metering Code performance report met the prescribed timing requirements as per obligations 441-443. Specifically, the release of the reports were as follows: 2020/21 annual report sent to the Minister on 21 September 2021 and published on the 30 September 2021 2021/22 annual report sent to the Minister on 21 September 2022 and published on the 30 September 2022 - Inspection of the report confirmed compliance with the information prescribed in 5.37(2) and classification prescribed in 5.37(3) of the Metering Code, as per obligations 444-445. Findings: CutlerMerz finds that Western Power has complied with these obligations to publish compliance reports in the timeframe prescribed and with the content required by the Metering Code.	A	1
442.	A network operator must provide a copy of the report described in subclause 5.37(1)(a) to the Minister and the ERA not less than 5 business days before it is published under subclause 5.37(3).	4		A	1
443.	A network operator must publish the report described in subclause 5.37(1) within 3 months after the year ends.	4		A	1
444.	The report prepared by the network operator must include the information prescribed.	4		A	1
445.	For each relevant metering service, the information in subclause 5.37(2) must be reported separately for the specified classes of connection point.	4		A	1
446.	network operator must keep such records of information as are required for the purposes of subclause 5.37, and must retain the information (in a format that is accessible within a reasonable period of time) for at least 7 years after the day on which a report containing the information is published under subclause 5.37(1)(c)	4	CutlerMerz has examined Western Power's Annual Compliance Reports to the Minister. We determined the following: - Western Power was able to provide the relevant reports from within the last 7 years from the date published, as compliant with the Metering Code. Findings: CutlerMerz finds that Western Power has complied with this obligation to provide reports as required by the Metering Code.	A	1
447.	A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	2	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's monthly compliance reports. We determined the following: - Non-compliance affected 1.39% of requested service orders in FY2021, 1.80% of requests in FY2022 and 1.42% of requests in FY2023. The non-compliance relates to services orders under the model service level agreement not delivered in accordance with the prescribed timeframes listed in the service level agreements. This represents 1.8% of 273,946 total service orders requested over 2022. In particular, the non-compliance resulted from not completing meter testing within the prescribed timeframes under obligation 415 of the Metering Code. The other non-compliance related to some meter reads incorrectly labelled as actuals which should have been labelled as substitute reads. - Western Power monitors compliance with the services it delivers under the model service level agreement with monthly compliance reports. - The metering technical services team advised that the continued rollout of AMI meters is expected to improve compliance obligations in respect of services delivered under the model service level agreement. The remotely read features of these meters combined with automated capability to download and validate metered data, and user processing requests automatically via B2B processes will increase the efficiency of responding to user requests within the prescribed timeframes. The rollout of AMI meters is expected to be complete by 2027 and is expected to improve compliance with this clause. The pace of the replacement program is adequate consider the scale of the replacement program across Western Power's metering fleet, and is in line with industry practice.	B	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			Findings: CutlerMerz finds that Western Power has not complied with this obligation to services not delivered as per the model service level agreement. We find that, until the completion of the AMI meter rollout, Western Power's controls cannot be expected to, so far as reasonably practicable, ensure compliance. Recommendation 5/2023: Where the rollout of AMI will improve compliance with this obligation, CutlerMerz recommends that Western Power continues its rollout of AMI meters and conduct periodic reviews of the improvement to compliance with the obligation[12]. Where the rollout of AMI will not improve compliance with this obligation, CutlerMerz recommends that Western Power review its current internal processes and their implementation to improve compliance with the prescribed timeframes.		
448A.	A network operator must, as soon as practicable and in any event no later than 6 months after the date this Code applies to it, submit to the ERA for its approval the prescribed documents in subclauses 6.2(a)-(d).	5	Obligations 448A to 450. CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's website and emails to the Minister. We determined the following: - Western Power submitted for approval and subsequently published its communication rules, metrology procedure, model service level agreement and mandatory link criteria and any further versions in compliance with obligations 448A-448D. - Limited amendments of these documents were required during the auditing period of 1 July 2020 to 30 June 2023. The model service level agreement was amended, submitted for approval and published on the Western Power website during the audit period, as per Code obligation 450. The Model Service Level Agreement commenced on the 30 September 2020. - In accordance with obligation 449, Western Power advised that the build pack had been updated during the audit period and these changes were recorded on Western Power's website as of 5 February 2021. Changes to the build pack were also made outside of the audit period on 1 July 2023 that reflect changes to the Metering Code. The Metering Technical Services Team advised that all changes to the build pack and metrology procedure are overseen by a working group that includes personnel from the ERA and Energy Policy Western Australia. Findings: CutlerMerz finds that Western Power has complied with these obligations in publishing the relevant documentation in accordance with the timeframes prescribed by the Metering Code.	A	1
448B.	A network operator must publish the document within 10 business days after notification of the ERA's approval under subclauses 6.13(1)(a)(i), 6.16 or 6.17.	5		A	1
448C	A network operator must publish its communication rules as soon as practicable, and in any event within 6 months after the date this Code applies to it.	5		A	1
448D	Once communication rules have been published for a network under clause 6.19A, or amended under clause 6.21(3), the communication rules may only be amended thereafter in accordance with the communication rules made under subclause 6.7(1)(k) or clause 6.19C.	5		A	1
449.	A network operator must amend any document in accordance with the ERA's final recommendation.	5		A	1

[12] It is noted that whilst the rollout of AMI meters will have a positive impact on Western Power's compliance rate with the obligation, factors outside of Western Power's control (such as communication failures and customers opting out of AMI) may prevent Western Power from achieving total compliance with the obligation.

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
450.	The network operator must publish any document that has been amended under subclause 6.20(4).	4		A	1
450A.	The electricity networks corporation must, by 1 October 2021, submit to the ERA for its approval a revised metrology procedure that: · contains a method for estimating weekly energy data for manually read interval metering installations; and · reflects any other changes made to this Code by the 2021 Metering Code amendments.	3	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's website. We determined the following: - Western Power submitted for approval and subsequently published on the Western Power website its communication rules, metrology procedure, model service level agreement and mandatory link criteria and any further versions in compliance with obligations 448A-448D. - Limited amendments of these documents were required during the auditing period of 1 July 2020 to 30 June 2023. The Metrology Procedure was amended and submitted for approval to the ERA by 1 October 2021, as per Code obligation 450A. Findings: CutlerMerz finds that Western Power has complied with this obligation to reflect any amendments to the metrology procedure, communication rules and model service level agreement, as per the requirements in the Metering Code.	A	1
451.	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.	5	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's customer handling procedure documents and website. We determined the following: - Inspection of Western Power customer handing procedures documents many methods to communicate with customers, including telephone, electronic business to business, email, facsimile and via the portal on the Western Power website. - Inspection of Western Power's website clearly lists contact phone numbers and email addresses that can be used to direct customer queries. - Western Power operates a call centre that is available to receive calls 24 hours, 7 days a week. Findings: CutlerMerz finds that Western Power has complied with this obligation to ensure that it can send and receive notices via the methods prescribed in the Metering Code.	A	1
452.	A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.	4	CutlerMerz has interviewed key personnel from Western Power's Customer Services Team. We determined the following: - The customer relations team advised that Western Power's contact details were not updated during the audit period. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
455.	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.	1*	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's data handling procedure. We determined the following: - Non-compliance related to the inadvertent disclosure of 327 customers' confidential information in FY2022 and 3 disclosures in FY2023, as a result of data being disclosed by another team within Western Power that is not associated with metering services. - Data response process involves data owner/data steward control. This procedure was in place at the time of the breach but has since been tightened to include a requirement to log requests for data through an internal IT system to trace how customer data moves between teams at Western Power. Additionally, a single point of contact has been designated to approve all data requests within Western Power and organisations external to Western Power, which is in line with industry practice. - In FY2023, 3 breaches of this obligation were recorded, as confidential data was inadvertently published on a social media site which affected 1 customer. Another instance involved the disclosure of customers' contact details during an online customer connection form. The last instance involved disclosure of customers details prior to receiving a letter of authority from the customer. Findings: CutlerMerz finds that Western Power has not complied with this obligation not to disclose confidential user information.	A	2
456.	A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	4	CutlerMerz has interviewed key personnel from Western Power's Metering Technical Services Team and examined Western Power's data handling procedure. We determined the following: - The Meter Technical Service Team confirmed that Western Power had provided confidential data to the customer (retailer Synergy) where the customer is the account holder during the audit period. Additionally, Western Power provided anonymised aggregated data to the Australian Energy Market Operator during the audit period. - Western Power's policy is to provide the customer with confirmation that information has been share via a B2B notification, email or telephone message. Findings: CutlerMerz finds that Western Power has complied with this obligation to disclose confidential information, as required by the Metering Code.	A	1
457.	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.	5	Obligations 457 to 461. CutlerMerz has interviewed key personnel from Western Power's Customer Services Team. We determined that Western Power did not enter any dispute during the audit period in respect of obligations 457-461 in the Metering Code. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R
458.	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.	5		N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
459.	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.	5		N/P	N/R
460.	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.	4		N/P	N/R
461.	The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective in subclause 8.3(1).	5		N/P	N/R
16 Electricity Industry (Network Quality and Reliability of Supply) Code					
462.	A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	5	CutlerMerz has interviewed key personnel from Grid Strategy and Network Control and examined documentation of relevant Standard Operating Procedure documents and a sample Western Power Utility Report conducted by the University of Wollongong. We determined the following: - Standards for new customer applications are mainly dictated through design standards as to harmonic limits and flicker, with special considerations for new loads which have the potential to have a large impact on power quality such as large industrial loads. - Western Power has a power quality strategy that includes both proactive and reactive work. - Much of the proactive work is informed by the Western Power Utility Report conducted by the University of Wollongong. - The reactive work is managed by the field team and includes things like replacing capacitors and adding load tap changers. - Western Power also monitors power quality through a network of 260 PQ monitors and uses a tool called Spider View to identify potential problems. - Western Power is investing in new technologies to improve power quality, such as undergrounding new feeders and installing static synchronous compensators (STATCOMS). - They are also working on an EV Charging Guideline that will address the impact of electric vehicles on power quality. - With respect to investment, a reactive and proactive project is initiated every regulatory period. Findings: CutlerMerz finds that Western Power has complied with this obligation in as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards for harmonics and voltage fluctuation. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
463.	A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	5	CutlerMerz has interviewed key personnel from Network Control and an in-field electrician responsible for Power Quality Investigations, and examined Western Power's relevant Standard Operating Procedure documents. We determined the following: - Disconnections of supply of electricity resulting from Power Quality Investigations are infrequent. - The Power Quality Investigation process is discussed in further detail under obligation 479. - The field team uses Western Power's Geoview to determine the location of sensitive customers, including life support addresses and sensitive infrastructure when planning de-energisations. - If the personnel responsible for network quality monitoring detected an issue it would be brought up with the field people from that team, but the team has not yet encountered this. Findings: CutlerMerz finds that Western Power has complied with this obligation in so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
464.	A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	4	CutlerMerz has interviewed key personnel from Network Control and examined Western Power's relevant Standard Operating Procedure documents. We determined the following: - Western Power's network is designed in accordance with the Technical Rules prescribed by the ERA. - Reliability is as a key factor in prioritisation of maintenance programmes and defect remediation. - The network planning processes are broadly consistent with Western Power's peers. - Western Power's processes for implementing planned works consider approaches to minimise the frequency and duration of outages experienced by customers. - Western Power uses mobile generators during unplanned outages to minimise the outage duration and customers affected. - The eNAR system discussed in further detail under obligation 465 enhances the field crew's ability to prioritise and reduce the duration of interruptions. Findings: CutlerMerz finds that Western Power has complied with this obligation in as far as reasonably practicable, ensuring that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
465.	A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a customer.	5	Obligations 465 to 466 CutlerMerz has interviewed key personnel from Network Control, conducted a walkthrough of the Western Power's eNAR system, and examined relevant Standard Operating Procedure documents. We determined the following: - Western Power's eNAR system guides field personnel and requires them to enter fields as they conduct fieldwork. - eNAR has a checklist to identify the strategies you have considered to reduce the effect of interruption on customers. - The eNAR has a default earliest start date, since there is a certain amount of time required to complete the work	A	1
466.	A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	5		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			- Once the eNAR is submitted, the team must submit evidence to support it. This includes field checks to verify who will be affected by the outage. - The team uses Western Power's Geoview tool to see if the work will impact any sensitive customers, including sensitive infrastructure and all life support addresses. - There is a five-day training course that needs to be taken for any personnel that is to be given access to the network. - The eNAR system requires the originator of the outage request to consider whether mobile generation is required based on the following factors in descending order or importance: 1. Can the network be interconnected to get the customers back on safely? 2. What is the likely fix time compared to the normal ERG deployment time? 3. Are resources available? 4. Are there vital locations, key third party infrastructure sites, and/or sensitive customers involved? - Once the eNAR request has been completed including any determination if alternative means of supply is required, the Outage Notification & Evidence (ONE) system will automatically notify affected customers. Where customers are registered with LSE requirements, Western Power will contact them to acknowledge receipt of the notification. Findings: CutlerMerz finds that Western Power has complied with these obligations in, so far as reasonably practicable, reducing the effect of any interruption to a customer and considering alternative means of supplying electricity in the circumstances specified by the Electricity Industry Network Quality and Reliability of Supply Code. We also find that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.		

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating

467.	In the event of a significant interruption to a small use customer, a distributor must either:
	· remedy the cause(s) of interruption so that the prescribed standard is met; or
	· enter into an alternative arrangement to the customer's satisfaction for the supply of electricity.
		2	CutlerMerz has interviewed key personnel from Distribution Grid Strategy, examined Western Power's Distribution and Transmission Reliability Strategies and Annual Compliance Reports, and reviewed Western Power's processes for managing, monitoring and reporting on its planned and unplanned outages.
			
			We determined the following:
			- Western Power continues to report a substantial number of incidents where the prescribed standards in the Network Quality and Reliability of Supply Code for both outage duration and the number of interruptions were not met and reported non-compliances in its FY2021, FY2022 and FY2023 Annual Compliance Reports.
			- The majority of the incidents were the result of extreme weather events.
			- In response to the non-compliances, Western Power has taken the following course of action:
			  - Increased usage of emergency response generators and HV injection units, which in some cases can supply a whole town.
			  - During Cyclone Seroja, the entire business went into response mode. New technologies were trialled, and analysis was performed, suggesting that SPS would be the best option in some circumstances. This forms a component of Western Power's wider strategy for the future grid.
			  - As Western Power's network assets age, it plans to make increased usage of SPS in low-density areas as part of its corporate strategy.
			- Western Power is continually monitoring and reviewing the instances of non-compliance with the aim of further improving its performance.
			- In relevant investment and preparations, Western Power, with constraints on capital, aims to spend prudently for maximum impact.
			- Refer to obligations 464, 465, and 466 for further details on how Western Power aims to reduce the occurrence, duration, and impact of outages.
			
			Findings: CutlerMerz finds that Western Power, as reported by Western Power, has not complied with this obligation in not meeting the standards with respect to outage duration and the number of interruptions. Given the nature of the non-compliances and that it may not be practicable to maintain 100% compliance through adverse climatic events, we find that its controls can be expected to, so far as reasonably practicable, ensure compliance.
				A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
468.	A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	4	CutlerMerz has interviewed key personnel from Distribution Grid Strategy and examined Western Power's Distribution and Transmission Reliability Strategies. We determined the following: - Western Power is constantly monitoring its compliance with reliability standards and is developing models to predict future performance. - The company's operations team is responsible for emergency response, supply restoration, and the overall operation of the network. - The delivery team is responsible for fault crews and immediate emergency/corrective maintenance. - The Near Term Plan includes programs of work that will directly and indirectly improve reliability, such as asset replacement, regulatory compliance, capacity expansion, and maintenance works. - Western Power produces a service standard benchmark report which provides comparison to previous years and attempts to identify root causes that may be preventable. - Reliability strategies have been developed and implemented in specific areas of the network, and a community engagement strategy has also been created to focus on these areas. - Through the reliability strategies Western Power looks to target some reliability investment through a 'hotspot list', determined using a 5y average of their reliability. - Western Power makes decisions about network interventions based on a priority framework of investment outcomes. The current priority setting is weighted towards public safety. - The focus for service is to maintain current average service levels, improving service only where it is valued by the customer and efficient to do so. Findings: CutlerMerz finds that Western Power has complied with this obligation in, so far as is reasonably practicable ensuring that customers in specified areas do not have average total lengths of interruptions of supply greater than the durations specified in the Network Quality and Reliability of Supply Code.	A	1
469.	The average total length of interruptions of supply is to be calculated using the specified method.	4	CutlerMerz has interviewed key personnel from Insights and Analytics, conducted a walkthrough of Western Power's QLIK business intelligence dashboards, and examined its Reliability validation and reporting instruction manual. We determined the following: - Western Power calculates the average total length of interruptions using its Network Reliability Data Validator (NRDV) system, which queries data from the Data Warehouse, which stores data generated by the PowerOn Advantage system. - For transparency, the average of each financial year is displayed on Western Power's QLIK dashboards alongside the average total length of interruptions calculation, which is an average of the four financial year averages. - The constituent data refreshes at 6:00am WST every morning. Findings: CutlerMerz find that Western Power has complied with this obligation in calculating the average total length of interruptions using the specified method, and that its mechanisms and processes can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
469A.	Western Power must, so far as is reasonably practicable, have in place arrangements to: · restore and maintain at least 45 megawatts of supply to essential services loads and the majority of small use customers in the Eastern Goldfields as soon as is reasonably practicable following the occurrence of an unplanned outage of a transmission element supplying the Eastern Goldfields; and · maintain at least 45 megawatts of supply to essential services loads and the majority of small use customers in the Eastern Goldfields during the occurrence of a planned outage of a transmission element supplying the Eastern Goldfields. Note: These are temporary reliability standards that apply from 1 October 2018 to 30 September 2023.	5	Obligations 469A. to 469B. 'CutlerMerz has interviewed key personnel from Network Control and examined Western Power's guideline documents for the Eastern Goldfields and North Country network arrangements. We determined the following: - The North Country guidelines provide principles for the operation including system normal operation, operating with outages, operating under lightning storm conditions, and operating under islanded condition. - The Eastern Goldfields guidelines provide principles for normal operation, islanded operation and HV line restoration. - Western Power has entered into network control services contracts with Synergy to help them manage their network in both the North Country and Eastern Goldfields regions. The provider will help to manage planned outages, such as those that are necessary for maintenance work, and unplanned outages. - Both arrangements are set to renew once they expire. Findings: CutlerMerz finds that Western Power has complied with these obligations in its arrangements for supply to the Eastern Goldfields and North Country regions, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
469B.	Western Power must, so far as is reasonably practicable, have in place arrangements to: · restore and maintain at least 50 megawatts of supply to essential services loads and the majority of small use customers in the North Country as soon as is reasonably practicable following the occurrence of an unplanned outage of a transmission element supplying the North Country; and · maintain at least 50 megawatts of supply to essential services loads and the majority of small use customers in the North Country during the occurrence of a planned outage of a transmission element supplying the North Country. Note: These are temporary reliability standards that apply from 1 October 2018 to 30 September 2023.	5		A	1
.	A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	CutlerMerz has interviewed key personnel from Regulatory Compliance and Customer Service and examined the Customer Service Centre General Training Manual. We have determined that Western Power has not had any instruments issued by the minister under the Electricity Industry Network Quality and Reliability of Supply (this) Code. If it were to be prescribed such an instrument under the this Code, responsibility would lie with the Regulation and Investment Assurance team, first through the Senior Compliance Specialist, then to the Complaints and Resolutions Team for provision of copies to affected customers. Findings: CutlerMerz makes no findings with respect to compliance as no activity occurred with respect to this obligation over the audit period, but finds that its controls can be expected to, so far as reasonably practicable, ensure compliance.	A	N/R
471.	A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their agreement.	4	CutlerMerz has interviewed key personnel from Access Solutions. We determined that no provisions of the Electricity Industry Network Quality and Reliability of Supply Code have been excluded or modified by Western Power during the audit period. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period	N/P	N/R

472.	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe for a failure to give required notice of planned interruption.	1*	CutlerMerz has interviewed key personnel from the Customer Service Centre, conducted a walkthrough of its process for making payments for non-notification of planned outage, and examined Western Power's Annual Compliance Reports submitted to the ERA, its Service Standard Payments - Non Notification Planned Outage Procedure document, combined reconciliation files (for the three financial years over the audit period) for service standard payments against Western Power's Ellipse payment data , and a planned outage dashboard report. We determined the following: - As disclosed in its breach records and FY2022 Annual Compliance Report to the ERA, in one instance during the audit period, Western Power did not pay a customer the required service standard payment within 30 days of the claim, as prescribed by the Network Quality and Reliability of Supply Code. The cause of the non-compliance was due to a human error, some procedural steps had also not been followed in assessing the claim. - The reconciliation files (for the three financial years over the audit period) for service standard payments against Western Power's Ellipse payment data, do not show any additional non-compliances. - When making a claim, a customer completes the online form, when received (via an automated email) by the team in the Customer Service Centre this is entered into a spreadsheet and an investigation is performed to determine if the address was impacted by a planned outage. The vast majority of applications are customers who experienced an outage due to a fault but falsely believed that it was due to a planned outage. Additionally, some customers that are impacted by an extended outage fill in the form for payment for non-notification of a planned outage by mistake. - In the investigation process, the location associated with the claim is compared with a list of all the incidents that have happened at the location in the PowerOn Advantage distribution management system. - If the investigating team member cannot determine whether the location was affected by a planned outage it is escalated to the team leader. If the team leader is also unable to determine this, it is referred to the Network Operations Control Centre (NOCC) who then performs the final investigation and are the only team that can discard an application if they are unable to find an affected address. NOCC then produces an explanation which is sent back to the Customer Outages team as evidence. - The tracking spreadsheet has green, amber, and red flags to reflect timeframes. - The ONE notification system will send an email or SMS to each customer in Western Power's Spyder system, which records the location of all meters on the network, when planned outage is planned. - Western Power typically approves approximately 20 payments for non-notification of a planned outage per month. - In response to this and previous non-compliances, Western Power implemented monthly reconciliation. The reconciliation entails a team member running two reports, one that shows all service standard payment claims for non-notification of planned outages that have been processed in the Ellipse system, and a separate comparative report that shows all the invoices that have been paid. Both reports contain an invoice number reference that is used for the comparison. This is to confirm that each invoice number in the system has been paid. - The process is unable to be automated due to the subjectivity in determining whether an outage is planned or unplanned. An example of a grey area is where a pole gets knocked down and gets replaced in three days, in this instance it is unclear whether or not it is a planned outage if the meter is not in the system as being affected by a planned outage. Findings: CutlerMerz finds that Western Power, as disclosed in its FY2022 Annual Compliance Report to the ERA, has not complied with this obligation in meeting the prescribed timeframe when making payments for non-notification of planned outages at all times within the prescribed timeframe. Given the inherent subjectivity required in determining if an outage is planned or unplanned, we believe that complete automation of the process is not possible and as such, it may not be realistic or practicable for Western Power to maintain 100% compliance at all times. Given this, we find that its controls can be expected to, so far as reasonably practicable, ensure compliance.	A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating

473.	A distributor operating a relevant distribution system must, in specified circumstances, make a payment to a customer within a specific timeframe if a supply interruption exceeds 12 hours.	1*	CutlerMerz has interviewed key personnel from the Customer Service Centre, conducted a walkthrough of its Extended Outage Payment Scheme (EOPS) Process, and examined Western Power's Annual Compliance Reports submitted to the ERA, documentation of its EOPS Process, and EOPS Fortnightly Checks spreadsheets for each financial year which include details and timeframes associated with all EOPS payments.
			
			We determined the following:
			- As disclosed in its breach records and FY2022 Annual Compliance report to the ERA, of 40,848 payments made for interruptions exceeding 12 hours in FY2022, in 2 instances Western Power did not pay a customer the required service standard payment within 30 days of the claim, as prescribed by the NQRS Code. The cause of the non-compliance was attributed to failed payments caused by two distinct system errors that were not identified in the prescribed timeframe.
			- In response to this and previous non-compliances, Western Power implemented the following process improvements:
			  - Western Power implemented fortnightly reconciliation. The fortnightly reconciliation entails a team member running two reports, one that shows all EOPS claims that have been processed in the Ellipse system and a separate comparative report that shows all the invoices that have been paid, both reports contain an invoice number reference that is used for the comparison. This is to confirm that each invoice number in the system has been paid.
			  - Western Power's EOPS report now produces a different error in the event of an invalid BSB. The error now requires multiple contact attempts to be made with the customer, one by phone and one by email, all within 30 days.
			  - Email notification of failed payments has since been automated to provide timely visibility in order to increase the opportunity to rectify within the prescribed timeframes.
			  - Western Power also made changes to the 'Extended Outage' page under 'Make a claim' on its website, which now states customers need to have their BSB and Account number ready, and for them to take time to ensure their accuracy.
			- Western Power's EOPS Fortnightly Check spreadsheets, which show the details and timeframes associated with all EOPS payments and cover the entire audit period including FY2023, do not show any additional non-compliances.
			- Western Power makes all extended outage service standard payments directly and not through the retailer.
			
			Findings: CutlerMerz finds that Western Power, as disclosed in its FY2022 Annual Compliance Report to the ERA, has not complied with this obligation in meeting the prescribed timeframe when making payments under its Extended Outage Payment Scheme. We find that after the process improvements that were made in response to the non-compliances, that its controls can be expected to, so far as reasonably practicable, ensure compliance.
				A	2

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
474.	A distributor operating a relevant distribution system must provide eligible customers with information about applying for payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	CutlerMerz has interviewed key personnel from the Customer Service Centre, examined Western Power's website, and reviewed its complaints handling process. We determined the following: - Information is available on Western Power's website (under 'Make a claim') about applying for payments for failure to give required notice of a planned interruption and interruptions exceeding 12 hours (sections 18 and 19). - The rights to payment and the actions the customer must take in making a claim that are specified in the Electricity Industry Network Quality and Reliability of Supply Code are provided on the website, with the caveat that Western Power offers a $50 payment for a non-notification of a planned outage rather than the specified $20. Findings: CutlerMerz finds that Western Power has complied with this obligation in providing eligible customers with the requisite information about applying for payments to meet the requirements in sections 18 and 19 of the Network Quality and Reliability of Supply Code. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
475.	A distributor operating a relevant distribution system must provide written notice to customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.	4	Obligations 475 to 476 CutlerMerz has interviewed key personnel from Customer Service and examined relevant communications between Western Power and Synergy. We determined the following: - Such notifications are issued by Synergy, their notice covers both their and Western Powers' requirements. - Western Power does not communicate directly with Synergy's customers. - Western Power provides information contained in the Service Standard Payment information pamphlet on its website. Findings: CutlerMerz finds that Western Power has complied with these obligations in providing written notice to eligible customers through Synergy, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
476.	A distributor operating a relevant distribution system must provide written notice to eligible customers about payments for failure to meet the requirements in sections 18 and 19 of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005 not less than once in each financial year.	4		A	1

477.	A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	5	Obligations 477 to 478
			CutlerMerz has interviewed key personnel from Grid Strategy and examined documentation of Western Power's corporate database (PI Historian).
			
			We determined the following:
			- Relevant data is stored on Western Power's PI Historian database, which is used for annual reporting. This stores data from all dedicated monitoring devices across the network and some of the meters (AMI meters), data from other meters get stored in a separate dedicated server.
			- Western Power has so far kept all data for an unlimited timeframe and not just the minimum seven years, but this is currently under review.
			- Field measurements are performed in response to reported problems by the customer.
			- All monitoring measurements associated with reactive PQ complaints are permanently stored in the DQM and can be referenced from the DQM work request number for the specific customer problem.
			- The PQ performance of the distribution network is proactively monitored on a sample basis using permanently installed PQ monitoring instruments (DM6110695).
			- Transmission:
			  - The performance of the transmission network has been continuously monitored by over 90 permanently installed AMETEK recorders with their data being processed by Comtrade servers and transferred into the corporate PI data storage.
			  - ION mobile recorders are used for temporary monitoring of some transmission customers and investigation of suspected trouble spots.
				A	1

478.	A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			- Data from corporate PI data storage is used to generate monthly reports. These are used for 'Ongoing monitoring' and creation of the 'Annual' reports. All reports are stored permanently. Findings: CutlerMerz finds that Western Power has complied with these obligations in taking all steps that are reasonably necessary to monitor the operation of its network to meet its power quality requirements under the Electricity Industry Network Quality and Reliability of Supply Code and its record keeping. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.		

479.	A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.	3	CutlerMerz has interviewed key personnel from Technical Operations and an in-field electrician responsible for Power Quality Investigations, conducted a walkthrough of the DQM and examined documentation of associated procedures and email communications.
			
			We determined the following:
			- Power Quality Investigations are triggered when a customer sends a complaint about fluctuation or other power quality issues. The investigating officer is notified through the DQM system and has 4 days from when it falls in their inbox to get back to the customer.
			- Power Quality Investigators receive training which alerts them to the standards prescribed, the Power Quality Investigator interviewed at the Northam Depot was aware, when asked, of the standards for voltage fluctuation and harmonics.
			- On completion of a power quality investigation, there is an event in DQM that requires that the investigating officer advises the customer of the outcome of the investigation.
			- The front page of the power quality investigation job in the DQM shows the user when the 4 and 20 day SLAs are.
			
			- Western Power now tracks its compliance against this obligation through a report generated through the DQM system.
			- Western Power was non-compliant in the previous audit period but has managed to comply with the obligation throughout this audit period (1 July 2020 to 30 June 2023). It attributes the improvement in performance to the following improvements:
			  - Western Power implemented an email system from its Cognos system, which sends an automatic email to the customer when the investigation is complete.
			  - The DQM system has been upgraded to include red flags to notify investigating officers of the 4-day SLA and a section for the investigator to enter comments for tracking purposes.
			
			- Western Power's DQM system allows for Power Quality Investigation jobs to be allocated to regions in such a way that if an investigating officer is unable to perform the investigation it can be allocated to another available officer. In our site visit to the Northam depot, we determined that there is only one Power Quality Investigator in that depot, and that PQI jobs at that particular depot are generally unable to be reallocated to other officers as a result. This means that if the investigating officer takes leave, Western Power runs the risk of not meeting the timeframes specified in the Network Quality and Reliability of Supply Code.
			
			Findings: CutlerMerz finds that Western Power has complied with this obligation in meeting the requisite timeframes in completing power quality investigations. However, for its controls to, so far as reasonably practicable ensure compliance, we identify an opportunity for improvement that Western Power contemplate implementing extra measures related to resource capacity, distribution, and oversight to guarantee the ongoing fulfillment of deadlines for Power Quality issue investigations.
				B	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
480.	A distributor or transmitter must report the results of an investigation to the customer concerned.	4	CutlerMerz has interviewed key personnel from Technical Operations and an in-field electrician responsible for Power Quality Investigations, conducted a walkthrough of the DQM and examined associated email communications. We determined the following: - On completion of a power quality investigation, there is an event in DQM that requires that the investigating officer advises the customer of the outcome of the investigation. - The front page of the power quality investigation job in the DQM shows the user when the 4 and 20 day SLAs are. Findings: CutlerMerz finds that Western Power has complied with this obligation in reporting the results of power quality investigations to the customer concerned within the timeframe specified in the Network Quality and Reliability of Supply Code, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
481.	A distributor or transmitter must make available, at no cost, a copy of a document setting out its complaint handling processes to a small customer who makes a complaint to the distributor or transmitter or who asks to be given such information.	4	Obligations 481 to 482 CutlerMerz has interviewed key personnel from Customer Relations, and examined Western Power's website and documentation of its complaint handling process. We determined the following: - Western Power's complaints handling process is available on its website via 'FAQs => What is a Complaint?'. - Western Power's EDM system facilitates the upload to the website. - In all Customer Management System emails, the final paragraph provides a link to the complaints handling process. - Customers can call the call centre and the document will be provided through the customer's preferred method. - The Complaints and Resolution Team leader conducts regular monthly checks that the information is still on the website and that it is up to date, but this process has not yet been documented. - The phone number for the Ombudsman currently on the website is correct, but it is noted that the old Ombudsman's phone number redirects to the new correct one. Findings: CutlerMerz finds that Western Power has complied with these obligations in making its complaints handling process, which includes the information specified in the Network Quality and Reliability of Supply Code, available at no cost. CutlerMerz also finds that its controls can be expected to ensure ongoing compliance, but identifies an opportunity for improvement. We propose that Western Power document the procedure for reviewing and updating its complaint handling process.	A	1
482.	A document setting out a distributor's or transmitter's complaint handling process must contain the specified information.	4		B	1
483.	A distributor or transmitter must arrange for an independent audit and report on its systems for monitoring, and its compliance with specific requirements. This is to be carried out in respect of the operation of such systems during each reporting period of 3 years or as specified by the ERA.	4	Obligations 483 to 483B. 'CutlerMerz has interviewed key personnel from Regulatory Compliance and examined the ERA and Western Powers' websites, Western Power's head office, and associated communications with the Minister. We determined the following: - The previous Network Quality and Reliability of Supply audit for Western Power was conducted by CutlerMerz in 2020- The ERA did not require Western Power to have another Network Quality and Reliability of Supply audit carried out during the audit period. - Sample communications with the minister confirm that the Minister and the ERA were provided with a copy of the previous Network Quality and	A	1
483A.	A distributor or transmitter must publish the audit report not later than 1 October following the reporting period.	4		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
483B.	A distributor or transmitter must give a copy of its audit report to the Minister and the ERA not less than 7 days before it is published.	4	Reliability of Supply audit seven days before it was published. - As part of its obligation to publish the Network Quality and Reliability of Supply audit, Western Power makes hard copies available at its head office available to the public at no cost. - Associated deadlines are tracked in Western Power's Reporting Timetables. Findings: CutlerMerz finds that Western Power has complied with these obligations in its arrangement for, publishing, and provision to the Minister and the ERA of its Network Quality and Reliability of Supply audits, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
484.	A distributor or transmitter must annually prepare and publish a report about its performance in respect of each year ending on 30 June.	4	Obligations 484 to 485 CutlerMerz has interviewed key personnel from Regulatory Compliance and examined the Western Power's annual Network Quality and Reliability of Supply performance reports, the ERA and Western Powers' websites, Western Power's head office, and associated communications with the Minister. We determined the following: - Western Power fulfilled its obligations to annually prepare and publish its annual Network Quality and Reliability of Supply reports for each financial year during the audit period. - Sample communications with the minister confirm that the Minister and the ERA were provided with a copy of the previous Network Quality and Reliability of Supply audit seven days before it was published. - As part of its obligation to publish the Network Quality and Reliability of Supply audit, Western Power makes hard copies available at its head office available to the public at no cost. - Associated deadlines are tracked in Western Power's Reporting Timetables. Findings: CutlerMerz finds that Western Power has complied with these obligations in its arrangement for, publishing, and provision to the Minister and the ERA of its annual Network Quality and Reliability of Supply audits, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
485.	A distributor or transmitter must give a copy of its report about its performance to the Minister and the ERA not less than 7 days before it is published.	4		A	1
17 Electricity Licences – Licensee Specific Conditions and Obligations					
490.	The licensee must submit to the Coordinator a draft extension and expansion policy within the specified timeframe.	4	Obligations 490 to 492 CutlerMerz has interviewed key personnel from Regulatory Compliance and examined the ERA's website. We determined that there has been no requirement for Western Power to supply a draft extension and expansion policy as the extension and expansion policy has been repealed. Findings: CutlerMerz makes no findings as no activity occurred with respect to these obligations over the audit period.	N/P	N/R
491.	The licensee must comply with a direction given by the Coordinator in relation to a draft extension and expansion policy or an amendment to an extension and expansion policy.	4		N/P	N/R
492.	The licensee must implement arrangements set out in an approved extension and expansion policy.	4		N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating

493.	The licensee will operate and maintain a trouble call fault management system.	4	CutlerMerz has interviewed key personnel from Network Operations Development and examined documentation of Western Power's PowerOn Advantage distribution management system as it relates to incident management and the call taker wizard, and other relevant documentation.
			
			We determined the following:
			- PowerOn Advantage is Western Power's complete distribution management system supplied by General Electric.
			- It includes a call taker, a front end management system for call centre.
			- Dispatchers list the priority, and work is electronically dispatched.
			- Most calls are created by a Call Taker in the Customer Contact Centre using the Call Taker application, which uses a sequence of questions through a wizard to triage the incident, identify the correct call category, and collect further information about the incident. There are 40 or 50 incident categories, each one assigned a priority, electric shock is the highest.
			- POA also raises some types of incidents automatically when it detects incidents on the network through Western Power's SCADA monitoring system.
			- Once an incident is created, it is presented to a Dispatcher electronically. The Dispatcher can then dispatch the incident to a field crew electronically via the Mobile application or over the phone.
			- The Dispatcher must place the incidents in one of the following queues based on the information from the field as it is managed:
			  - SFW (Special Follow Up Work)
			  - IRG (Incident Response Group)
			  - IRGP (Incident Response Group Parked)
			- A priority is assigned when an incident is moved from IRG to IRGP based on criteria outlined in Western Power's standard operating procedure documents.
			- The dispatch rules apply 24 hours a day, seven days a week.
			- Once dispatched, field workers can see which incident is pertinent to them, close down the job when completed, and put in comments.
			
			Findings: CutlerMerz finds that Western Power has complied with this obligation in operating and maintaining its trouble call fault management system, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.
				A	1

494.	The licensee must provide prior notification to the ERA if it intends to outsource its trouble call fault management system.	4	CutlerMerz has interviewed key personnel from Network Operations and Regulatory Compliance. We have determined that Western Power has not outsourced its trouble call fault management system (PowerOn Advantage), there are no plans for Western Power to outsource it, and the key personnel interviewed cannot foresee any realistic circumstance that would cause them to consider outsourcing it. In the hypothetical event that it is outsourced, Western Power will provide the ERA prior notification. Findings: CutlerMerz makes no findings as no activity occurred with respect to this obligation over the audit period.	N/P	N/R

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
497.	The licensee must have a stand-alone power system engagement strategy that complies with the requirements under sub regulation 10(3).	3	CutlerMerz has interviewed key personnel from SPS Delivery, and examined Western Power's website, SPS Program Customer Engagement Strategy, and other relevant communications and documentation. We determined the following: - The SPS Program Customer Engagement Strategy is Western Power's stand-alone power system engagement strategy. - Despite being endorsed by the minister, the SPS Program Customer Engagement Strategy does not contain indicative costs and specifications. As such, it does not comply with the requirements under sub regulation 10(3) of the Electricity Industry Licence Conditions Regulations and by extension, this obligation. It does, however, contain all the other specified fields. Findings: CutlerMerz finds that Western Power has not complied with this obligation in as its stand-alone power system engagement strategy does not contain all requisite information. We believe that Western Power should identify the compliance requirements for the contents of the SPS Engagement Strategy and ensure that all are included. Given this, we do not find that Western Power's controls can be expected to, so far as reasonably practicable, ensure compliance. Recommendation 6/2023: We recommends that Western Power, at next review of the SPS Engagement Strategy, identify the compliance requirements for the contents of the SPS Engagement Strategy and ensure that all are included.	B	2
498.	The licensee must comply with the stand-alone power system engagement strategy in relation to the provision of stand-alone power systems to eligible customers.	3	CutlerMerz has interviewed key personnel from SPS Delivery and examined Western Power's Equipment Relocation Work Instruction document, SPS Program Customer Engagement Strategy and sample SPS related brochures and online materials, test forms, advice letters, and project summaries. We determined that all materials reviewed were consistent with SPS Program Customer Engagement Strategy and that Western Power endeavours to operate consistently with the intentions of its SPS Program Customer Engagement Strategy. Findings: CutlerMerz finds that Western Power has complied with this obligation and with its stand-alone power system engagement strategy, and that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.	A	1
499.	The licensee must have the initial stand-alone power system engagement strategy endorsed by the Minister.	3	Obligations 499 to 501 CutlerMerz has interviewed key personnel from SPS Delivery and examined relevant email communications and documentation which show that the stand-alone power system engagement strategy was endorsed by the Minister, and examined Western Power's website. We determined the following: - Western Power's stand-alone power system engagement strategy, the SPS Program Customer Engagement Strategy, is maintained and made publicly available on Western Power's website. - The stand-alone power system engagement strategy is less than two years old and is not yet due for a review. Western Power's SPS Customer Engagement Calendar Activity Schedule has not yet been extended to 2024, but this item has been flagged and highlighted accordingly, stating that the review is scheduled to be completed by May 2024, and it is not due to be completed under the regulations until 30 June 2024. Findings: CutlerMerz finds that Western Power has complied with these obligations in obtaining the endorsement of the Minister for its stand-alone	A	1
500.	The licensee must review the stand-alone power system engagement strategy at least every two years.	3		A	1
501.	The licensee must ensure that the current version of the stand-alone power system engagement strategy is publicly available on a website maintained by the licensee.	3		A	1

Reference No.	Obligation description	Audit priority	Audit outcome / evidence	Controls Rating	Compliance Rating
			power system engagement strategy, having not been required to review its SPS strategy as it is less than two years old, and by publishing it electronically and maintaining it on its website. CutlerMerz also finds that its controls can be expected to, so far as reasonably practicable, ensure ongoing compliance.		

Appendix A – Information Provided

The information provided during the audit is provided in Table 11 and is grouped by business segment.

Table 11: Information Provided

Asset Management
Obligation 102 Asset Management System Description.pdf
Customer (Customer Relations, Customer Service Centre)
Control-M Server Shout by order no 0003nm70 D365_HUB_CMS_CASE has failed 10 Times for 20230516.msg
Copy of EOPS Fortnightly Checks 22-23.xlsx
Copy of EOPS Fortnightly Checks 20-21.xlsx
Copy of EOPS Fortnightly Checks 21-22.xlsx
.3(2) ELECTRICITY TRANSFER ACCESS CONTRACT APPROVED WESTERN POWER TEMPLATE CONTRACT _.docx
CTC 7.1 to 7.3 and MC 8.1 and 8.3 - Dispute Resolution Process.docx
D365_HUB_CMS_CASE has failed 10 Times for 20230516 Issue Resolved.msg
Daily Update - 10 August 2023 - Email to Complaint Officers.msg
NQRS 18 Planned Outage - SSP INVESTIGATION and PAYMENT SPREADSHEET 201920.xlsx
NQRS 19 EOPS Process 2023.docx
NQRS 21 (2) and (3) FW EXTERNAL RE Service Standard Payments 2020.msg
NQRS 21.1 Claim Forms for Customers_.docx
O2C Reg 7(1) and (8) Copy of June 2019 New Connections Compliance Report.xlsx
O2C Reg 7(1) and 8 New Connection Non Compliance Reporting Instructions.docx
O2C Reg 8 2019_20 Annual record keeping report data list.xlsx
Obligation 284 and 285 CSC General Training Manual_.docx
Obligation 284 Copy of CSC Training Matrix_.xls
Obligation 284 Items from Audit Meeting.msg
Planned Outage Dashboard Report.pptx
Service Standard Payments - Non Notification Planned Outage Procedure.docx
SUCC 12.1 & 12.4 Complaints Classification Matrix 2014_.vsd
SUCC 12.1 Telephone Etiquette and Complaints Process_.docx
SUCC 14.4 & 14.7 Copy of Ellipse Payment Data for SSP Reconciliation 2021 to 2023 .xlsx
SUCC - 12.1 Copy of CMS Complaints 20-23.xlsx
SUCC 10.11 Induction Manual for New Starters_.docx
SUCC 10.11(2) template invoice sample.pdf
SUCC 10.6 to 10.11 CMS Case Subject Checklist and Additional Information_.docx
SUCC 10.6 to 10.11 CMS Instructions.docx
SUCC 10.6 to 10.11 Faults Overflow Session Plan_.docx
SUCC 10.6 to 10.11 Induction & Faults Program PPT CSC _.pptx
SUCC 10.6 to 10.11 Induction and Faults Training - Session Plan_.docx
SUCC 10.6 to 10.11 Session Plan - General Enquiries_.docx
SUCC 10.7 and 10.8 Customer Service Centre Training Manual - General Calls_.docx
SUCC 10.7 and 10.8 Customer Service Centre User Guides - General Calls_.docx
SUCC 10.9 Western Power - Writing Style Guide 2019_.pdf
SUCC 12.1 & 12.4 Complaints Management, Reporting and Dispute Resolution_.docx

SUCC 12.1, NQRS 25 Western Power Complaints Handling Process_.docx
SUCC 12.3 Copy of Complaints Matrix (12260380)_.xls
SUCC 14.4 & 14.7 Copy of Cmpl and Resolution Payment Spreadsheet (12600360)_.xls
SUCC 14.4, NQRS 18 and 19 Copy of Ellipse_Payment_Data_for_SSP_Reconciliation_1718_to_1819_.xlsx
SUCC 14.4, NQRS 18 and 19 Ellipse Payment Data for SSP Reconciliation 1819 to 1920.xlsx
Confirmation Voting Button - Read and Understood both Codes (Required by 30 June 2023).msg
SUCC 7.6 FW D365_HUB_CMS_CASE has failed 10 Times for 20200527 - Please Investigate.msg
SUCC 7.6 RE JIRA (CMS-2711) Add issues management to case failure email.msg
FW Control-M Server Shout by order no 000354yh D365_HUB_CMS_CASE has failed 10 Times for 20220519.msg
SUCC 7.6 Complaints & Resolutions Work Instructions.docx
SUCC 7.6 Procedure for Cmpls relating to a Disconnection _.doc
SUCC 7.6 Sample of RE NetCIS Planned Outage - Thursday 15 June 2017 600PM - 0845PM (CHG0037476).msg
SUCC 7.7(4) Planned Outage Customer Notification and Compliance Procedure_.docx
b) and 7.7(5) PLANNED OUTAGE LIFE SUPPORT EQUIPMENT CUSTOMER TELEPHONE CONTACT GUIDE _.docx
SUCC 7.7(4)(b) Copy of Audit EDM reference tracker.xlsx
SUCC 7.7(4)(b) Copy of ENAR Comparison Letter to save tracker.xlsx
SUCC 7.7(4)(b) Copy of Planned Outage Team Role Training and Sign Off_.xlsx
SUCC 7.7(4)(b) Manual Notifications Process.docx
Customer Connections (O2C)
ERA Approved - Appendix A - Electricity Transfer Access Contract AA4.pdf
ETAC - SIGNED.pdf
Information Request - O2C.docx
O2C Admin Process from August 2011_.docx
Obligation 111 Member of the Ombudsman scheme.msg
Obligation 111 Ombudsman Scheme Invoice INV-1327.pdf
Obligation 111 Ombudsman Scheme Invoice INV-1346.pdf
Obligation 295 AR Invoice - B0648271.pdf
Obligation 73 Consolidated DIM (Multiple PDF Files).pdf
Obligation 75 O2C Admin Process from August 2011_.docx
Obligation 76 and 77 Current -New Connections Compliance Report July 2022 to Jun 2023.xlsx
Obligations 76 and 77 New Connection Non Compliance Reporting INSTRUCTIONS.docx
Obligations 76 and 77 New Connections Compliance Report - April 2021 to Jun 2022.xlsx
PROCEDURE (SOP) OBLIGATION TO CONNECT (O2C) UPDATED VERSION CREATED FROM DM#237402335 docx
Obligation to connect summary.pdf
General
2021 Financial Year Reporting Timetable, Checklists & Instructions.xlsx
2022 Financial Year Reporting Timetable, Checklists & Instructions.xlsx
2023 Financial Year Reporting Timetable, Checklists & Instructions.xlsx
Annual Compliance Reports - Schedule A (Obligation 124)
Audit progress updates
CMPJ0718 - WP PA RFI register v1.0.xlsx
CORPORATE DOCUMENT FRAMEWORK.pdf
Data Sheets (Obligations 305-307 until 20 Feb 2023 and Obligation 124, 125)
Metering Code Reporting (Obligations 441-446)

Organisation Chart March 2023.docx
Performance Audit 2023 - Obligations Register.xlsx
Procedure to update Policies.pdf
2020-21 Annual Compliance Report - Schedule A Covering Letter.pdf
2020-21 Annual Compliance Report - Schedule A.pdf
2020-21 Annual Compliance Report Email to ERA.msg
2021-22 Annual Compliance Report - Cover Letter.pdf
2021-22 Annual Compliance Report - Schedule A.pdf
FW EXTERNAL RE Western Power's 202122 Annual Compliance Report - Schedule A.msg
2022-Electricity-Licence-Reporting-Datasheets---Distribution.XLSX
2022-Electricity-Licence-Reporting-Datasheets---Network-Quality-Reliability-Code.XLSX
Electricity Performance Reporting Datasheet - Distribution - 2021.xlsx
Electricity Performance Reporting Datasheet - NQR Code - 2021.xlsx
FW Western Power's Electricity Performance Reporting Datasheets for 2021_22.msg
Obligation 124 Western Power's Electricity Performance Reporting Datasheets for 2021_22.msg
Obligation 124 Western Power Electricity Performance Reporting Data Sheet - 2021.msg
Obligation 125 Western Power's Electricity Performance Reporting Datasheets for 2021_22 Published.msg
Obligation 125 Western Power Electricity Performance Reporting Data Sheet - 2021.msg
Western Power's Electricity Performance Reporting Datasheets for 2021_22.msg
Western Power Electricity Performance Reporting Data Sheets for 2020-2021.msg
Obligation 102 Asset Management System Description.pdf
Obligation 105 Licence fee payments to the ERA.pdf
Obligation 119 Financial Management Policy_-1.pdf
Approval of audit and review plans - 2020 Audit and Review - EDL001 ETL002 - Western Power.pdf
Obligation 124 ERA Request - Data used to calculate 2022 Electricity Licence Standing Charges.msg
Obligation 124 ERA- Distribution licence reliability reporting.msg
Service Standard Performance Report Letter to Western Power with template of required information.pdf
Obligation 126 Notification of Type 1 Breach of Customer Notification Details - emails.docx.pdf
Obligation 287 MBS Screenshot 410M178413 Records retained for 7 years.pdf
Obligation 399 INC2186844 Alinta Energy Bulk Standing Data extract_.pdf
Obligations 284, 285 Consumption data requests.msg
Obligations 287, 399 Email from Simon Thurtle and Stephen Coley.msg
Obligations 475 and 476 Service standard payment - annual customer notifications 2022.msg
Obligations 475 and 476 Service standard payments bill inserts communication for 2021.msg
2020-21 Annual Performance Report - Metering Code.pdf
2021-22 Annual Performance Report - Metering Code.pdf
64517 Briefing Note on Western Power's Metering Code Report to the Minister for 2020-21.pdf
202021 Annual Performance Report Metering Code.msg
GR-64656 Briefing Note on Western Power's Metering Code Report to the Minister for 2021-22.pdf
Metering Code Report Covering Letter to the ERA for 2020-21.pdf
Metering Code Report Covering Letter to the ERA for 2021-22.pdf
Reports for Submission to Minister.msg
Western Power's Metering Code Performance Report for 2021_22 Published AEMO.msg
Western Power's Metering Code Performance Report for 2021_22 Published.msg

Note on Western Power's Annual Reliability and Power Quality Report to the Minister for 2020-21.pdf
64382 Western Power 2019-20 NQRS Reports Briefing Note.pdf
Annual Reliability and Power Quality Report for 2020-21 Covering Letter to the ERA.pdf
Annual Reliability and Power Quality Report for 202021.msg
Annual Reliability and Power Quality Report for 2021-22 Covering Letter to the ERA.pdf
Annual Reliability and Power Quality Report for the year ended 30 June 2020.pdf
Annual Reliability and Power Quality Report for the year ended 30 June 2021.pdf
Annual Reliability and Power Quality Report for the year ended 30 June 2022.pdf
Note to the Minister on Western Power's Annual Reliability and Power Quality Report for 2021-22.pdf
Network Quality and Reliability of Supply Code Reports - 2019-20 - covering letter to the ERA.pdf
Publication of Annual Reliability and Power Quality Reports 2019_2020.msg
Metering Code Annual Performance Report, and Annual Reliability and Power Quality Report for 2021_22.msg
Reports for Submission to Minister.msg
Grid Transformation
DIMs.pdf
Distribution_Reliability_Strategy.pdf
Grid Strategy__36.docx
NQRS - Written PQ Complaints Process- DP 27 Mar.vsdx
Power_Quality_Strategy.pdf
Reliability_-_Transmission_Strategy.pdf
SOP 163 Power on Fusion Incident Management_.pdf
Western Power 2021-2022 PQCA Update 2 Utility Report.pdf
Metering
filenames.txt
Meter Data Management
Meter Provision
Obligation 450A Revised Metrology Procedure For Metering Installations on the Western Power Network.msg
Obligations 448A-448D Communication Rules.msg
355_-_License_Agreement_with_meter_supplier_(Landis_&_Gyr).PDF
Change Request CHG0076115 is ready for approval - Obligation 368.msg
Commercial_Services_Reporting_Procedures.docx
COMPLEX_METERING_AND_LABORATORY_-_METER_PERFORMANCE_TEST_PROCESS_ONSITE_AND_LABORATORY.doc
Copy of Compliance Record - Meter Data Management_.xlsx
Data Steward Responsibilities.pptx
EMS Billing
EMS_Billing_SLA_2006_pricing_and_checklist.xlsx
Exception_Report_Procedure.DOC
FS_INDEX.XLS
FW__[EXTERNAL]_RE__EasiView_Software.msg
High_Voltage_Measurement_Current_and_Voltage_Transformers_Design_Guidelines.pdf.docx
IDM_PROCESS_Customer_Transfer.DOCX
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