



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

BHP BILLITON WORSLEY ALUMINA PTY LTD GENERATION LICENCE EGL 12 PERFORMANCE AUDIT REPORT

Prepared By Kevan McGill Date 19 October 2010

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McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

David Schmidt Commercial Analyst BHPBilliton Worsley Alumina Pty Ltd Worsley Alumina Refinery Collie WA 6225

Dear Mr Schmidt

Performance Audit Electricity Licences

The fieldwork on the performance audit of Generation Licence EGL 12 for the audit period (1 July 2008 to 30 June 2010) is complete and I am pleased to submit the report to you. The report reflects my findings and opinions.

In my opinion, the Licensee has not maintained a high level of compliance with the licence conditions. There were 2 non compliances with obligations relating to the Authority. Consistent with the scope limitation the reports to the Authority are accurate.

In my opinion, the Licensee maintained basic controls with respect to obligations of the Generation Licence (EGL 12) for the audit period based on the relevant clauses referred to within the objectives section (Page7) of this report.

Yours sincerely

Kevan McGill Director

Date 19 October 2010

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2 Executive Summary

This performance audit was conducted in accordance with the guidelines¹ issued by the Economic Regulation Authority (*Authority*) for the audit period (1 July 2008 to 30 June 2010).

2.1 OVERALL CONCLUSION

In my opinion, the Licensee has not maintained a high level of compliance with the licence conditions. There were 2 non compliances with obligations relating to the Authority. Consistent with the scope limitation the reports to the Authority are accurate.

In my opinion, the Licensee maintained basic controls with respect to obligations of the Generation Licence (EGL 12) for the audit period based on the relevant clauses referred to within the objectives section (Page7) of this report.

2.2 LICENSEE'S BUSINESS

The Licensee is an Alumina refinery which requires electricity and steam for the refining process. The Licensee provides electricity to the WEM when it has excess generation and sources electricity from the WEM at times of generation shortage. It has 110 MW of steam turbine generation plant.

An extension to the generation plant is occurring on site but not through this generation licence. There are 3 generation Licensees on the site.

2.3 PERFORMANCE AUDIT

A summary of the findings of the performance audit is:

2.3.1 COMPLIANCE SUMMARY RATINGS

The compliance rating for each Obligation using the 7-point rating scale (5 for numerical rating score and 2 not rated/not applicable scales) is described in table below and as determined by the auditor.

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance

¹ Economic Regulation Authority: Audit guidelines: Electricity, Gas and Water Licences Aug 2010

COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance					
NON-COMPLIANT	2	Does not meet minimum requirements					
SIGNIFICANTLY 1 NON-COMPLIANT		Significant weaknesses and/or serious action required					
NOT APPLICABLE	N/A	Determined that the compliance obligation does not apply to the Licensee's business operations					
NOT RATED	N/R	No relevant activity took place during the audit period, therefore it is not possible to assess compliance					

The results are summarised below.

Assessment	Licence obligations	Audit priority 4	Audit priority 5
Compliant 5	11	6	5
Compliant 4	1	1	0
Compliant 3	0	0	0
Non-compliant 2	2	1	1
Significantly non compliant 1	0	0	0
Not Applicable	8	5	3
Not Rated	25	18	7

3 PERFORMANCE AUDIT

3.1 PERFORMANCE AUDIT OBJECTIVES

Under section 13 of the *Electricity Industry Act 2004* (the Act), it is a requirement that every Licensee provide the Economic Regulation Authority (*Authority*) not less than once in every period of 2 years with a performance audit conducted by an independent expert acceptable to the *Authority*.

The primary objective of the audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the Licensee to meet the performance criteria specified in the licence. The licence states that performance standards are contained in *applicable legislation*. Performance criteria are defined in the licence as:

- (a) the terms and conditions of the licence; and
- (b) any other relevant matter in connection with the *applicable legislation* that the *Authority* determines should form part of the *performance audit*.

The licence also provides for individual licence conditions namely - the *Authority* may prescribe *individual performance standards* in relation to the *Licensee* of its obligations under this *licence* or the *applicable legislation* (the Act and subordinate legislation).

The *Authority* has summarised the performance requirements in various legislation in its Electricity compliance reporting manual (March 2008)².

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Generation Licence with approval from the Authority. A preliminary assessment was conducted with the Licensee's management to determine the inherent risk and the state of control for each compliance element of the Licence obligation. McGill Engineering Services Pty Ltd then prioritised the audit coverage based on the risk profile of the Licensee with an emphasis on providing greater focus and depth of testing for areas of higher risk to provide reasonable assurance that the Licensee had complied with the standards, outputs and outcomes under the Licence obligations.

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 "Planning Performance Audits" and AUS 806 "Performance Auditing". McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Generation Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Generation Licence EGL 12 for the Licensee.

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² Electricity compliance reporting manual, March 2008

3.2 AUDIT PERIOD

The audit period is 1 July 2008 to 30 June 2010.

3.3 SCOPE LIMITATION

The audit was undertaken by examination of documents, interviews with key persons and observations and is not a detailed inspection of physical items.

Assessment of accuracy of computations is limited to inspection of spreadsheets and the like with an overview of the calculations and random inspection of formulae. Because of the nature of this type of inspection no conclusion can be made that all calculations are correct nor can assurance that data entry errors have not occurred be drawn. The form and nature of financial statements have been examined but no detailed examination of the calculations therein.

3.4 INHERENT LIMITATIONS

Because of the inherent limitations of any internal control structure, it is possible that fraud, error or non-compliance with laws and regulations may occur and not be detected.

An audit is not designed to detect all weaknesses in compliance measures as an audit is not performed continuously throughout the period and the audit procedures performed on the compliance measures are undertaken on a test basis.

Any projection of the evaluation of the licences to future periods is subject to the risk that the compliance measures in the plans may become inadequate because of changes in conditions or circumstances, or that the degree of compliance with them may deteriorate.

The audit opinion expressed in this report has been formed on the above basis.

3.5 STATEMENT OF INDEPENDENCE

To the best of my knowledge and belief, there is no basis for contraventions of any professional code of conduct in respect of the audit.

I have not done or contemplate undertaking any other work with the Licensee.

There are no independence threats due to:

- self-interest as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review no circumstance has occurred where:
 - the audit company or a member of the audit team has undertaken other nonaudit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or

 where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

There is no risk of a self-review threat as:

- no work has been
 - undertaken by the auditor, or a member of the audit/review team, for the Licensee within the previous 24 months; or
 - the auditor is currently undertaking for the Licensee; or
 - the auditor has submitted an offer, or intends to submit an offer, to undertake for the Licensee within the next 6 months; and
- familiarity there is no close family relationship with a Licensee, its directors, officers or employees,
- and is not nor is perceived to be too sympathetic to the Licensee's interests.

3.6 SCOPE OF THE AUDIT

The audit was conducted in 3 phases.

1. RISK AND MATERIALITY ASSESSMENT

With reference to AS/NZS4360 Risk Management a preliminary assessment was made of the risk and materiality of non-compliance with the required licence conditions in order to focus the audit effort on areas of higher compliance risk and identify areas for testing and analysis.

2. SYSTEM ANALYSIS, ASSERTION SETTING AND REVIEW

Through discussion, observation and review, a sample of cases or data was analysed relating to the Licensee's quality and performance systems and standards against requirements of the Licensee conditions to be audited.

3. FIELDWORK: TESTING AND ANALYSIS

Using the results of the risk assessment and systems analysis, detailed testing and analysis was performed to compare those standards maintained by the Licensee with the relevant clauses of the Licence.

During this audit the Worsley licence areas were visited.

There are no actions from previous audit to follow up.

The report to the Licensee and the *Authority* clearly expresses the opinion of the auditor in respect of the findings of the audit.

The key contacts were:

- Licensee
 - David Schmidt Commercial Analyst Worsley Alumina, Gail Godenzi
 Operations Coordinator Worsley Alumina, Tony Mills Maintenance
 Superintendant Worsley Alumina, Steve Thomas Powerhouse Shutdown
 Coordinator Worsley Alumina, Tony Minards, BHP Billiton Worsley
 Alumina, Lead Engineer Power House.
- McGill Engineering Services Pty Ltd
 - Kevan McGill

The audit was conducted during August and September 2010. Kevan McGill spent about 100 hours on the audit.

3.7 AUDIT REQUIREMENTS

Compliance with licence conditions was examined according to the likely inherent risk and the adequacy of controls to manage that risk.

Nature of audit work conducted

The Authority guidelines for performance audits require that the audit considers:

- a) **Process compliance** the effectiveness of systems and procedures in place throughout the audit period, including the adequacy of internal controls.
- b) **Outcome compliance** the actual performance against standards prescribed in the licence throughout the audit period.
- c) Output compliance the existence of the output from systems and procedures throughout the audit period (that is, proper records exist to provide assurance that procedures are being consistently followed and controls are being maintained).
- d) **Integrity of performance reporting** the completeness and accuracy of the performance reporting to the Authority.
- e) Compliance with any individual licence conditions the requirements imposed on the specific Licensee by the Authority or specific issues for follow-up that are advised by the Authority.

Stage	Auditor	Standard
1. Risk & Materiality	K McGill	ASA 300 Planning
Assessment Outcome		ASA 315: Risk Assessments and
- Operational/		Internal Controls
Performance Audit		AUS 808: Planning Performance
Plan		Audits
		AS/NZS 4360:2004: Risk Management
		ERA Guidelines
2. System Analysis	K McGill	AUS 810: Special Purpose Reports on
		Effectiveness of
		Control Procedures
3. Fieldwork	K McGill	AUS 502: Audit Evidence
Assessment and		AUS 806: Performance Auditing
	<u> </u>	

testing of; The control environment Information system Compliance procedures Compliance attitude		
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

3.8 FINDINGS

The conclusions of each of the elements of the licence are summarised in the following table. The audit risk as determined for each licence condition is also shown. The details of the audit can be seen in the detailed audit findings section (Page16)

	ψ.		T			1			1	T						
ltem	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule)	Obligations under condition	Consequences	1 11	Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	Licence Type (G=Generation)	Туре	Review priority	Rat	ting					
Licenc	e Condition	ns – Licence	e Cla	use –(Seneration						ting					
Obliga	tions- Elec	ctricity Indus	stry A	ct Sec	tion					1	2	3	4	5	Nª	N ^r
81.	15.1	s ³ 13(1)	1	С	Low	M	G -	NR	5	\top				Ø		
82.	16.1	s14(1)(a)	1	C ·	Low	M	G	NR	5					Ø		
83	16.1	s14(1)(b)	2	С	Medium	М	G	2	4					Ø		
	&16.2															
84.	16.3	s14(1)(c)	1	С	Low	Μ.	G	NR	5					Ø		
85.	4.1	s17(1)	1.	С	Low	M	G	NR	5		Ø					
86	5.1	s31(3)	1	С	Low	Μ.	G	NR	5					Ø		
87.	5.1	s41(6)	2	С	Medium	М	G	2	4							Ø
		ns – Electric	city Ir	ndustry	Act Section	n Oblig	gations- Lic	cence	9	Rat	ing			٠.		
Clause	e –Generat	ion								1	2	3	4	5	Na	N
103.	s11	15.2/12.2/ 12.2	2	С	Medium	М	G	2	4						,	☑
104.	s11	15.3/12.3/ 12.3	2	С	Medium	М	G	2	4							Ø
105.	s11	16.1/13.1/	2	С	Medium	М	G	2	4	†	T -		Ø	l		

³ s = Section

		13.1/20.1	Τ			,	1	ı —		г	Γ'			1	1	ī.
400	-44			C		 			4	⊢	_			-		
106.	s11	17.4/14.4/	2	le.	Medium	М	G	2	4 .		ľ					
407	- 44	14.4/21.4	_				<u></u>	-	1	-	_				1	├
107.	s11	18.2/15.2/	2	С	Medium	М	G	2	4		ľ			Ø		
		15.2/22.2	·	<u> </u>		ļ	<u> </u>			<u> </u>	_			_	ļ	╙
108.	s11	19.4/16.4/	2	С	Medium	М	G	2	4			<i>'</i>		Ø		l
		16.4	ļ							<u> </u>						<u> </u>
109.	s11	20.1/17.1/	2	С	Medium	М	G	2	4	ľ					ŀ	Ø
		17.1/24.1														
110.	s11	21.1/18.1/	2	С	Medium	M	G	2	4		Ø					Ī
		18.1/24.1				1	I		1	1				1	i	1
111.	s11	22.2/19.2/	2	С	Medium	М	G	2	4	[-				Ø
		19.2/25.2			1.					ļ.	,				ļ	
112.	s11	23.1/20.1/	2	С	Medium	М	G	2	4	Ť				Ø		
	}			A *.	.		ì		١	}	}.			1	1	1
Licenc	e Condition	ns – Licence		use.	<u> </u>		* * *			Rat	ing					-
Obliga	itions- Elec	tricity Indus	try.M	letering	Code Cla	use	•			1	2	3.	4	5	Na	N
319.	5.1	3.11(3)	2	С	Medium	М	G	2	4		H			<u>├</u>		
	5.1	3.16(5)	2	c	Medium	М	G	2	4	 				├	Ø	 -
	5.1	3.27	2	C	Medium	M	G	2	4	 -	-	_		1		Ø
	5.1.	4.4(1)	1	c	Low	M	G .		5	┼	_			├		
	5.1	4.5(1)	1	C	Low	M	G		5	-	<u> </u>			 		N N
	5.1			C	 -		G		4	-	-			₩	-	
351.		4.5(1)	1		Low	M		2		├ —	_			<u>├</u>	<u> </u>	
363.	5.1	5.4(2)	1	С	Low	M	G	_	5	ļ				<u> </u>	<u>. </u>	Ø
365.	5.1_	5.5(3)	2	С	Medium	М	G	2	4						Ø	
	5.1	5.16	2	C	Medium	М	G	2	4	<u> </u>					Ø	<u> </u>
377.	5.1	5.17(1)	2	С	Medium	М	G	2	4						Ø	
	5.1	5.18	2	С	Medium	М	G	2	4		ļ				Ø	
379.	5.1	5.19(1)	1 _	С	Low	М	G	NR	5						\square	
380.	5.1	5.19(2)	1	С	Low	М	G	NR	5						Ø	
381.	5.1	5.19(3)	2	C '	Medium	М	G	2	4							Ø
382.	5.1	5.19(4)	2	С	Medium	М	G	2	4							Ø
	5.1	5.19(6)	1	С	Low	М	G		5						Ø	
	5.1	5.21(5)	2	C	Medium	M	G	2	4	-					_	Ø
391.	5.1	5.21(6)	2	C	Medium	м	G	2	4	t	$\vdash \dashv$			\vdash		Ø
409.	5.1	5.27	2	c	Medium	М	G	2	4		\vdash			-	\vdash	Ø
416.	5.1	6.1(2)	2	C	Medium	M	G	2	4	-	$\vdash \vdash \vdash$			Ø		<u> </u>
	5.1	7.2(1)	1	C	Low	M	G		5					Ø		-
	5.1	7.2(4)	2	C	Medium	M	G		4	-	\vdash					Ø
				C			G	1		 -	\vdash			<u> </u>		Δ N
	5.1_	7.2(5)	2		Medium	M		2	4							ET.
	5.1	7.5	2	С	Medium	М	G	2	4					Ø		
423	5.1	7.6(1)	2	С	Medium	M	<u> </u>	2	4						L .	Ø
	5.1	8.1(1)	1	С	Low	М	G		5	<u> </u>						Ø
	5.1	8.1(2)	1	С	Low	М	G		5							Ø
	5.1	8.1(3)	1	С	Low	М	G	NR			L					Ø
427	5.1	8.1(4)	2	С	Medium	М	G		4			7				Ø
428	5.1	8.3(2)	1	С	Low	М	G	NR	5							Ø
]								

3.9 ESTABLISHING THE CONTEXT

The key legislation that governs the licensing of providers of electricity is the Electricity Industry Act 2004. In turn, the compliance elements in the Licence were examined and referred to throughout the audit process.

3.10 LICENCE ISSUES

There will be 3 licensed operators on the site and the electricity exported to the SWIS from this licence is very small. The Licensee may wish to consider if they can export through either the SWCJV licence or the licence for the refinery extension (WR Carpenter) and relinquish this licence as it then would be generating for self consumption.

3.10.1 AUDIT RESULTS AND RECOMMENDATIONS

Summary of significant results

There are 2 non compliances.

3.10.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

There are two issues to require corrective action

Item 85		Compliance rating
Generation Licence condition 4.1		Not Compliant 2

Licence: Generation

Electricity Industry Act section 17(1)

A Licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.

Observations

The Licensee paid the fees but one was late.

Issues

There is need for a process to ensure licence obligations are met and on time.

Recommendations

Develop a compliance manual listing obligations and target times with scheduled review times. A time based procedure in SAP allocated to a senior position would ensure that the procedure is not tied to a particular operative.

Item 110		· · · · · · · · · · · · · · · · · · ·	Compliance rating
Electricity Industry Act section 1	1 .		Not Compliant 2
Licence Generation		 	

Generation Licence condition

A Licensee must provide the Authority, in the manner prescribed, any information the Authority requires in connection with its functions under the Electricity Industry Act.

Observations

One report was provided in the manner required. The report was accurate in that it was consistent with the audit findings. One report was not provided at all. The 2010 report was late (outside the

audit period).

Issues

There is need for a process to ensure licence obligations are met and on time.

Recommendations

Develop a compliance manual listing obligations and target times with scheduled review times. A time based procedure in SAP allocated to a senior position would ensure that the procedure is not tied to a particular operative.

3.10.3 SUGGESTIONS FOR IMPROVEMENT

There are no suggestions for improvement

3.10.4 POST AUDIT IMPLEMENTATION PLAN

The Licensee is to provide a post audit plan.

3.11 DETAILED FINDINGS

3.11.1 AUDIT WORK UNDERTAKEN

We conducted interviews and enquiries to

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licensed areas; and
- Identify the information systems and processes employed to manage licensed areas
- Determine the level of understanding of the systems and processes for managing licensed areas
- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained flowcharts of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

3.11.2 AUDIT EVIDENCE

The following audit evidence was obtained:

Generation Licence

- Accounting Standards
- Obligations to comply with legal/environmental/safety obligations
- Energy Supply Risk analysis
- Demonstration of maintenance and planning IT systems
- Demonstration of risk registers.
- BHP Billiton Worsley Alumina 5 Year plan contents
- Licence invoices/receipts
- Contract document requirements
- Powerhouse performance obligations

3	12DF1	TAII FI	O AUD	IT FI	NDINGS
· ·		Δ			IADIIAOO

The following sets out the audit findings

3.12.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 81						-	· .	• • -	Compliance rati	ng
Generation L	Generation Licence condition 15.1								Compliant 5	
					٠.				<u> </u>	
Licence:	Ge	eneration								
Electricity Ind	ustry	Act section 13	(1)		-					
A Licensee m	ust, r	not less than on	ice ev	ery 24 r	mon	ths,	provide the Au	uthorif	ty with a performa	nce
		an independer							•	
Observations										
			_							
Documents _	Ø	Compliance_		Ø						
Evidence: In	tervie	ewed David Sch	nmidt	, listed s	staff	on s	ite. Document	s: Th	e Licensee advise	ed the
Authority of th	e cor	ntract arrangem	nents	with the	app	orov	al of the audito	r.		
Process	Ø	Outcome	V	Output		Ø	Reporting	Ø	Compliance	Ø
The Licensee	has	contracted with	the a	uditor ir	n acc	cord	ance with the	requir	ements.	
Issues									-	
										
None							_ .			
Recommend	ation	IS								
None										

Item 82									Compliance ra	ting	l
Generation Li	cence	e condition 16.1	<u> </u>			_			Compliant 5		
Licence:	G	eneration						_	-		
Electricity Indi	Electricity Industry Act section 13(1)										
A Licensee m	A Licensee must provide for an asset management system.										
Observations	3										
Documents	D	Compliance		Ø							
Evidence: In	tervie	ewed David Sch	nmidt,	listed	staff	on s	ite. Document	s incl	ude 5 Year plan,	ris	k
registers, perf	orma	nce obligations	(mea	sures)	, KPI	tar	gets and result	s.			
Process	D	Outcome	V	Output	t	Ø	Reporting	Ø	Compliance		Ø.
The Licensee	has	provided an ass	set ma	nagen	nent	syst	em and the re	view v	will examine the		
efficacy of the	syste	em.									
Issues											
None											
Recommend	ation	s									
None											

Item 83	Generation Licence condition 16.1 & 16.2	Compliance rating Compliant 5
Licence:	Generation	
	lustry Act section 13(1) hust notify details of the asset management system are ty.	nd any substantial changes to it

•	•
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: in	clude 5 Year plan, risk
registers, performance obligations (measures), KPI targets and results.	· ·
Process ☑ Outcome ☑ Output ☑ Reporting ☑	Compliance 🗹
The Licensee advised the Authority of the asset management system with	
licence. There have been no substantial changes since.	Talo approval of the
Issues	
None	
Recommendations	
None	· · · · · · · · · · · · · · · · · · ·
Item 84	Compliance rating
Generation Licence condition 16.3	Compliant 5
Licence: Generation	Compilant
Licence. Generation	
Electricity Industry Act section 14(1)(c)	
A Licensee must provide the Authority with a report by an independent ex	pert as to the
effectiveness of its asset management system every 24 months, or such I	onger period as
determined by the Authority.	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: In	clude documents
provide to ERA for approval of auditor, 5 Year plan, risk registers, perform	
(measures), KPI targets and results.	Ū
Process ☑ Outcome ☑ Output ☑ Reporting ☑	Compliance
The Licensee has contracted with the reviewer in accordance with the requirements	uirements.
Issues	
None	
Recommendations	
None	
Item 85	Compliance rating
Generation Licence condition 4.1	Not Compliant 2
Licence: Generation	Treat Compilant 2
Licence. Generalion	
Electricity Industry Act section 17(1)	
A Licensee must pay to the Authority the prescribed licence fee within one	
grant or renewal of the licence and within one month after each anniversa	ry of that day during the
term of the licence.	
Observations	
Documents 🗷 Compliance 🗵	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: Lie	cence invoices, journal
entries.	, ,
Process 🗵 Outcome 🗵 Output 🗷 Reporting 🗵	Compliance
The Licensee paid the fees but one was late.	<u> </u>
Issues	
There is need for a process to ensure licence obligations are met and on	time
Recommendations	
	
Develop a compliance manual listing obligations and target times with sch	
time based procedure in SAP allocated to a senior position would ensure	mat the procedure is no
tied to a particular operative.	

	,
Item 86 Generation Licence condition 5.1	Compliance rating Compliant 5
Licence: Generation	· · · · · · · · · · · · · · · · · · ·
Electricity Industry Act section 31(3)	
A Licensee must take reasonable steps to minimise the extent or duration of	of any interruption,
suspension or restriction of the supply of electricity due to an accident, em	ergency, potential
danger or other unavoidable cause.	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The outage logs.	e Licensee provided
Process ☑ Outcome ☑ Output ☑ Reporting ☑	Compliance 🗹
There has been a failure of a fault limiting reactor. There was no impact on	
return to service time was reasonable.	
Issues	
None	
Recommendations	
None	
Item 87	Compliance rating
Generation Licence condition 5.11	Not Rated
Licence: Generation	
Electricity Industry Act section 41(6)	
A Licensee must pay the costs of taking an interest in land or an easement	over land.
Observations	
Documents	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: No	
Process □ Outcome □ Output □ Reporting □	Compliance
There has been no purchase of land in the audit period. The land is a minir authority land.	ng lease and not public
Issues	
None Recommendations	
None	
3.12.2 ELECTRICITY LICENCES – LICENCE CONDITIONS A	ND
	MD
OBLIGATIONS	
Item 103	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: Generation	
Generation Licence condition 12.2	
A Licensee must amend the asset management system before an expansion	on or reduction in
generating works, distribution systems and transmission systems and notify	the Authority in the
manner prescribed, if the expansion or reduction is not provided for in the a	isset management
system.	
Observations	
Documents Compliance	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: Not	applicable.

Process					_	T = 1000	т —	1.2	
-		Outcome	<u> </u>	Output		Reporting		Compliance	
				ction in the	audit	period. The cu	irrent	expansion is bei	ng
constructed ur	ider a	inother licenc	е.		· .				
es									st .
None						4			•
Recommenda	ations	3		•			•	•	
None					-				
							_		
Item 104								Compliance rat	ina
Electricity Indu	istrv /	Act section 11						Not Rated	•
Licence:		eneration		-					
Generation Lic		aandikian 40				 		<u> </u>	<u> </u>
				etina work	a dia	tribution oveter	nc or	transmission sus	tómo
outside the lice			-	-		•	115 01	transmission sys	iems
Observations		area				· · · ·			
					٠.	<u> </u>		. 1	<u>. </u>
		Compliance				<u> </u>			
						site. Document			· ——
Process	. 🗖]	Outcome						Compliance	
	n no	expansion or	reduc	ction in the	audit	period except	const	ruction by anothe	er
icensee.			_					139.7	
ssues								·	<u> </u>
None					,				
Recommenda	ations	•							
None									
TTOTIC						<u> </u>			
Item 105				٠,		,		Compliance rat	ing
Electricity Indu	ıstry /	Act section 11						Compliant 4	
Licence:		neration						1	
Generation Li		o condition 13	1						<u> </u>
				nráte must	main	tain accounting	reco	rds that comply v	vith
								ational Accountin	
Standards.	, 1000	anting otalia	41 GO D	oura otario		o. oquivalorit.		7 5	9
Observations						* ****		11 (Ar. 1 - E.)	•
	_			1		, = + H ,		<u> </u>	i de
Documents	◩	Compliance	<u> </u>		78		- 5:		
					T On :		S FINE	ncial report sum	
Process	<u> </u>	Outcome	☑	Output		Reporting		Compliance nt possible by the	
venture.	comp	iles with miler	nauor	iai account	ing s	lanualus lo line	exter	it possible by the	JOINE
Issues									** **
Janues .						<u> 46</u>		ter en	
								:	<u>::</u>
	ations	\$				•			
					_			*	
Recommenda									
Recommenda		·							
None Recommenda None									
Recommenda						<u> </u>	4	Compliance rat	ing
Recommenda None	ıstry A	Act section 11				<u> </u>		Compliance rat Not Rated	ing
Recommenda None Item 106		Act section 11							ing
Recommenda None Item 106 Electricity Indu Licence:	Ge	neration					तरही 1 र		ing
Recommenda None Item 106 Electricity Indu Licence: Generation Licence	Ge ence	neration condition 14.	.4	idual nerfo	rman	ce standards n	akk ta		*

Observations	
Documents D Compliance D	
Documents □ Compliance □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: No	nt applicable
Process	Compliance
There are no individual performance standards.	Compliance L
Issues	
None	·
Recommendations	
None	
	
Item 107	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: Generation	
Generation Licence condition 15.2	
A Licensee must comply, and require its auditor to comply, with the Autho	rity's standard audit
guidelines dealing with the performance audit.	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	ne Licensee provided
contracting arrangements to the Authority with the approval of the auditor.	
Process ☑ Outcome ☑ Output ☑ Reporting ☑	Compliance 🗹
The Licensee has contracted with the auditor in accordance with the requi	
Issues	
None	
Recommendations	
Recommendations	
None	
None	
None Item 108	Compliance rating
	Compliance rating Compliant 5
Item 108	
Item 108 Electricity Industry Act section 11 Licence: Generation	
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4	Compliant 5
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to comply	Compliant 5 ly, with the relevant
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to complaspects of the Authority's standard guidelines dealing with the asset management.	Compliant 5 ly, with the relevant
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to compl aspects of the Authority's standard guidelines dealing with the asset mana Observations	Compliant 5 ly, with the relevant
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to complaspects of the Authority's standard guidelines dealing with the asset mana Observations Documents Compliance	Compliant 5 ly, with the relevant agement system.
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to compl aspects of the Authority's standard guidelines dealing with the asset mana Observations Documents Compliance Evidence: Interviewed David Schmidt, listed staff on site. Documents: The Compliance Co	ly, with the relevant agement system.
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to comple aspects of the Authority's standard guidelines dealing with the asset mana Observations Documents	ly, with the relevant agement system.
Item 108 Electricity Industry Act section 11	ly, with the relevant agement system. The Licensee provided in the Compliance of th
Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to comple aspects of the Authority's standard guidelines dealing with the asset mana Observations Documents	ly, with the relevant agement system. The Licensee provided in the Compliance of th
Item 108 Electricity Industry Act section 11	ly, with the relevant agement system.
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to comple aspects of the Authority's standard guidelines dealing with the asset mana Observations Documents ☑ Compliance ☑ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The contracting arrangements to the Authority with the approval of the reviewed Process ☑ Outcome ☑ Output ☑ Reporting ☑ The Licensee has contracted with the reviewer in accordance with the registers None	ly, with the relevant agement system.
Item 108 Electricity Industry Act section 11	ly, with the relevant agement system. The Licensee provided in the Compliance of th
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to compaspects of the Authority's standard guidelines dealing with the asset mana Observations Documents ☑ Compliance ☑ Evidence: Interviewed David Schmidt, listed staff on site. Documents: Trespondent of the reviewed Process ☑ Outcome ☑ Output ☑ Reporting ☑ The Licensee has contracted with the reviewer in accordance with the registates None Recommendations	ly, with the relevant agement system. The Licensee provided in the Compliance of th
Item 108 Electricity Industry Act section 11 Licence: Generation Generation Licence condition 16.4 A Licensee must comply, and must require the Licensee's expert to comple aspects of the Authority's standard guidelines dealing with the asset mana Observations Documents ☑ Compliance ☑ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The contracting arrangements to the Authority with the approval of the reviewed Process ☑ Outcome ☑ Output ☑ Reporting ☑ The Licensee has contracted with the reviewer in accordance with the registers None	ly, with the relevant agement system. The Licensee provided in the Compliance
Item 108 Electricity Industry Act section 11	ly, with the relevant agement system. The Licensee provided in the Compliance of th
Item 108 Electricity Industry Act section 11	Iy, with the relevant agement system. The Licensee provided or. Compliance uirements.
Item 108 Electricity Industry Act section 11	ly, with the relevant agement system. The Licensee provided or. Compliance uirements.
Item 108 Electricity Industry Act section 11	Iy, with the relevant agement system. The Licensee provided or. Compliance I uirements.
Item 108 Electricity Industry Act section 11	Iy, with the relevant agement system. The Licensee provided or. Compliance I uirements.
Item 108 Electricity Industry Act section 11	Compliant 5 ly, with the relevant agement system. The Licensee provided or. Compliance uirements. Compliance Variable V

administration or there is a significant change in the circumstances upon w granted which may affect a Licensee's ability to meet its obligations.	hich the licence was
Observations	
Documents Compliance	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: Ge	neration licence.
Process □ Outcome □ Output □ Reporting □	Compliance
The Licensee is not under external administration.	
Issues	
None	
Recommendations	
None.	
Item 110	Compliance rating
Electricity Industry Act section 11 Licence: Generation	Not Compliant 2
	<u> </u>
Generation Licence condition 18.1	mation the Authority
A Licensee must provide the Authority, in the manner prescribed, any infor requires in connection with its functions under the Electricity Industry Act.	mation the Authority
Observations	
Documents ☑ Compliance ☑ Evidence: Interviewed David Schmidt, listed staff on site. Documents: No	
Process Outcome Outcome Output Reporting Output Reporting Output Reporting Output Reporting Output Reporting Output Reporting Output O	
with the audit findings. One report was not provided at all. The 2010 report	
audit period).	was late (outside the
Issues	
There is need for a process to ensure licence obligations are met and on ti	
Recommendations	<u></u>
	
Develop a compliance manual listing obligations and target times with sche	eduled review times. A
time based procedure in SAP allocated to a senior position would ensure the	hat the procedure is not
tied to a particular operative.	
Item 111	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: Generation	
Generation Licence condition 19.2	
A Licensee must publish any information it is directed by the Authority to pu	ublish, within the
timeframes specified.	
Observations	
Documents	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: No	
Process □ Outcome □ Output □ Reporting □	Compliance
There was no requirement to publish any information.	
Issues	
None	
Recommendations	
None	
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Item 112 C	Compliance rating
	Compliant 5
Licence: Generation	Journal of The Control of the Contro
Generation Licence condition 20.1	
Unless otherwise specified, all notices must be in writing.	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: Samp with ERA.	ele communication
Process Outcome Output Reporting O	Compliance 🗹
The Authority did not require any notices. All material communication with the	Authority is in
writing.	
Issues	
None	
Recommendations	
None	
3.12.3 ELECTRICITY INDUSTRY METERING CODE – LICENC	
AND OBLIGATIONS (ALL LICENCE CONDITION LICENCE CLA	AUSE 5.1)
iltem 319	Compliance rating
	lot Rated
Licence: Generation	
Electricity Industry Metering Code clause 3.11(3)	
LA Code participant who becomes aware of an outage or malfunction of a met	ering installation
A Code participant who becomes aware of an outage or malfunction of a meter must advise the network operator as soon as practicable.	ering installation
A Code participant who becomes aware of an outage or malfunction of a meter must advise the network operator as soon as practicable. Observations	ering installation
must advise the network operator as soon as practicable. Observations	ering installation
must advise the network operator as soon as practicable. Observations	
must advise the network operator as soon as practicable. Observations Documents Compliance	icense e has no
must advise the network operator as soon as practicable. Observations Documents □ Compliance □ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The L meters and Western Power provides metering services at their Worsley subst Process □ Outcome □ Output □ Reporting □ C	icense e has no
must advise the network operator as soon as practicable. Observations Documents	icensee has no lation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no lation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no lation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no lation.
must advise the network operator as soon as practicable. Observations Documents □ Compliance □ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The L meters and Western Power provides metering services at their Worsley subst Process □ Outcome □ Output □ Reporting □ C The Licensee is not aware of any outages. Issues None	icensee has no lation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no lation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation.
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance □ Compliance rating lot Applicable
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance □ Compliance rating lot Applicable o a written service
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance □ Compliance rating lot Applicable o a written service
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance □ Compliance rating lot Applicable o a written service
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance □ Compliance rating lot Applicable o a written service
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance □ Compliance rating lot Applicable o a written service th under clause
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance
must advise the network operator as soon as practicable. Observations Documents	icensee has no tation. Compliance

consequently 3.16(5) which depends on 3.16(4) also does not apply. Issues	
None	
Recommendations	
None	
Item 342	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 3.27	
A person must not install a metering installation on a network unless the pe	erson is the network
operator or a registered metering installation provider for the network operator	
work authorised by its registration.	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	Licensee has no
meters and Western Power provides metering services at their Worsley sul	
Process	
No new meters have been installed in the audit period. There are no plans	
the Licensee understands that metering services can only be installed by the	ne network operator or
a registered metering installation provider. Issues	
None	
Recommendations	
None	
1	
Item 349	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	1101114104
Electricity Industry Metering Code clause 4.4(1) A network operator and affected Code participants must liaise together to c	otormino the most
appropriate way to resolve a discrepancy between energy data held in a m	
	etering installation and
	etering installation and
data held in the metering database. Observations	etering installation and
data held in the metering database. Observations	etering installation and
data held in the metering database. Observations Documents	
data held in the metering database. Observations Documents	Licensee has no
data held in the metering database. Observations Documents	Licensee has no
data held in the metering database. Observations Documents □ Compliance □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley sul Process □ Outcome □ Output □ Reporting □ There have been no discrepancies to liaise.	Licensee has no ostation.
data held in the metering database. Observations Documents	Licensee has no ostation.
data held in the metering database. Observations Documents □ Compliance □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley sul Process □ Outcome □ Output □ Reporting □ There have been no discrepancies to liaise.	Licensee has no ostation.
data held in the metering database. Observations Documents	Licensee has no ostation.
data held in the metering database. Observations Documents □ Compliance □ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley sul Process □ Outcome □ Output □ Reporting □ There have been no discrepancies to liaise. Issues None Recommendations	Licensee has no ostation.
data held in the metering database. Observations Documents □ Compliance □ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley sul Process □ Outcome □ Output □ Reporting □ There have been no discrepancies to liaise. Issues None	Licensee has no ostation.
data held in the metering database. Observations Documents □ Compliance □ □ Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley sul Process □ Outcome □ Output □ Reporting □ There have been no discrepancies to liaise. Issues None Recommendations None	e Licensee has no estation. Compliance
data held in the metering database. Observations Documents	Licensee has no ostation. Compliance
data held in the metering database. Observations Documents	e Licensee has no estation. Compliance
data held in the metering database. Observations Documents	Licensee has no ostation. Compliance
data held in the metering database. Observations Documents	Compliance rating Not Rated

Observations	
Documents □ Compliance □	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	Licensee has no
meters and Western Power provides metering services at their Worsley sul	
Process Outcome Output Reporting	Compliance
The Licensee's details have not changed and that is the only registry item t	
Issues	
None	ei e
Recommendations	
None	
·	
Item 351	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 4.5(2)	
If a Code participant (other than a network operator) becomes aware of a c	hange to or an
inaccuracy in an item of standing data in the registry, then it must notify the	
provide details of the change or inaccuracy within the timeframes prescribe	d
Observations	
Documents	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	Licensee has no
meters and Western Power provides metering services at their Worsley sul	
Process Outcome Output Reporting	Compliance
There have been no changes to the Licensee's standing data.	
Issues	
None	
Recommendations	
None	
14 200	O
Item 363	Compliance rating Not Rated
Licence condition 5.1	Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 5.4(2)	
A user must, when reasonably requested by a network operator, use reaso	nable endeavours to
assist the network operator to comply with the network operator's obligation	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	Licensee has no
meters and Western Power provides metering services at their Worsley sub	
Process Outcome Output Reporting	Compliance
No requests were made of users or the Licensee.	
Issues	
None	
Recommendations	
None	

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Item 365	Compliance rating				
Licence condition 5.1	Not Applicable				
Licence: Generation					
Electricity Industry Metering Code clause 5.5(3)					
A user must not impose any charge for the provision of the data under this	Code unless it is				
permitted to do so under another enactment.					
Observations	,				
Documents					
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The					
meters and Western Power provides metering services at their Worsley sul					
Process □ Outcome □ Output □ Reporting □	Compliance				
The Licensee has not raised a charge for metering data.					
Issues					
None					
Recommendations					
None					
	,				
Item 376	Compliance rating				
Licence condition 5.1	Not Applicable				
Licence: Generation	· · · · · · · · · · · · · · · · · · ·				
Electricity Industry Metering Code clause 5.16					
A user that collects or receives energy data from a metering installation mu	st provide the network				
operator with the energy data (in accordance with the communication rules					
prescribed.	,				
Observations					
Documents 🗹 Compliance 🗹	` `				
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The					
meters and Western Power provides metering services at their Worsley sul					
Process ☑ Outcome ☑ Output ☑ Reporting ☑	Compliance 🛛 🗹				
There are no meters to collect information or data from.					
Issues					
None Recommendations					
Recommendations					
None	· · · · · · · · · · · · · · · · · · ·				
TOTO	<u> </u>				
	0				
Item 377	Compliance rating				
Licence condition 5.1	Not Applicable				
Licence: Generation					
Electricity Industry Metering Code clause 5.17(1)	· · · · · · · · · · · · · · · · · · ·				
A user must provide standing data and validated (and where necessary sub	stituted or estimated)				
energy data to the user's customer, to which that information relates, where					
by an enactment or an agreement to do so for billing purposes or for the pu					
metering services to the customer.					
Observations					
Documents Compliance					
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The Licensee has no					
meters and Western Power provides metering services at their Worsley substation.					
meters and Western Power provides metering services at their Worsley sub					
	ostation. Compliance				

	customers as that is
done by the network operator. Issues	
None	
Recommendations	
None	
	
Item 378 Licence condition 5.1	Compliance rating Not Applicable
Licence: Generation	
Electricity Industry Metering Code clause 5.18	
A user that collects or receives information regarding a change in the energy metering point must provide the network operator with the prescribed information stated attributes, within the timeframes prescribed. Observations	
Documents Compliance	
Documents	Licensee has no
meters and Western Power provides metering services at their Worsley su	
Process Outcome Output Reporting	Compliance
There are no meters on site to be aware of energisation status. There has energisation status of the Western Power meters. The Licensee's installation Western Power on the Western Power substation.	
Issues	
None	
Recommendations	
None	
No. 270	Compliance roting
Item 379 Licence condition 5.1	Compliance rating Not Applicable
Licence condition 5.1 Licence: Generation	
Licence condition 5.1	Not Applicable with good electricity ustomers, if any, that
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Code	Not Applicable with good electricity ustomers, if any, that
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from cuassists the network operator in meeting its obligations described in the Codobservations Documents Compliance Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	Not Applicable with good electricity astomers, if any, that and elsewhere.
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents Compliance Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley sul	Not Applicable with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation.
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Cocobservations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from cuassists the network operator in meeting its obligations described in the Coc Observations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from cuassists the network operator in meeting its obligations described in the Coc Observations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance
Licence: Generation Electricity Industry Metering Code clause 5.19(1) A user must, when requested by the network operator acting in accordance industry practice, use reasonable endeavours to collect information from coassists the network operator in meeting its obligations described in the Coc Observations Documents	e with good electricity istomers, if any, that e and elsewhere. Licensee has no ostation. Compliance

Electricity Industry Metering Code clause 5.19(2)	
A user must, to the extent that it is able, collect and maintain a record of	
customer attributes, prescribed in relation to the site of each connection	point, with which the user
is associated.	
Observations	
Documents	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: T	he Licensee has no
meters and Western Power provides metering services at their Worsley s	
Process ☐ Outcome ☐ Output ☐ Reporting ☐	
The only connection point is with Western Power and there is no meter in	
from customers.	
Issues	
Nana	
None Recommendations	
Neconinendations	- -
None	
<u></u>	
Item 381	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	<u> </u>
Electricity Industry Metering Code clause 5.19(3)	
A user must, after becoming aware of any change in a site's prescribed a	ttributes, notify the
network operator of the change within the timeframes prescribed.	,
Observations	
Documents	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: T	
meters and Western Power provides metering services at their Worsley s	
Process □ Outcome □ Output □ Reporting □	I Compliance □
There have been no changes in attributes.	
Issues	
None	
Recommendations	
None	
Notice	
Item 382	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 5.19(4)	
A user that becomes aware that there is a sensitive load at a customer's	site must immediately
notify the network operator's Network Operations Control Centre of the fa	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: T	
	he Licensee has no
meters and Western Power provides metering services at their Worsley s	substation.
meters and Western Power provides metering services at their Worsley s Process ☑ Outcome ☑ Output ☑ Reporting ☑	ubstation.
meters and Western Power provides metering services at their Worsley s Process ☑ Outcome ☑ Output ☑ Reporting ☑ There are no sensitive loads.	substation.
meters and Western Power provides metering services at their Worsley's Process ☑ Outcome ☑ Output ☑ Reporting ☑ There are no sensitive loads. Issues	substation.
meters and Western Power provides metering services at their Worsley's Process ☑ Outcome ☑ Output ☑ Reporting ☑ There are no sensitive loads. Issues None	substation.
meters and Western Power provides metering services at their Worsley's Process ☑ Outcome ☑ Output ☑ Reporting ☑ There are no sensitive loads. Issues	substation.
meters and Western Power provides metering services at their Worsley's Process ☑ Outcome ☑ Output ☑ Reporting ☑ There are no sensitive loads. Issues None	substation.

	
Item 384	Compliance rating
Licence condition 5.1	Not Applicable
Licence: Generation	"
Electricity Industry Metering Code clause 5.19(6)	
A user must use reasonable endeavours to ensure that it does not notify th	e network operator of a
change in an attribute that results from the provision of standing data by the	e network operator to
the user. Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	
meters and Western Power provides metering services at their Worsley sul Process ☑ Outcome ☑ Output ☑ Reporting ☑	
There has been no standing data provided by the network operator. There	Compilario
information that the Licensee would hold.	is no customer
Issues	
None 3	
Recommendations	
None	
	
Item 390	Compliance rating
Licence condition 5.1	Compliance rating Not Rated
Licence condition 5.1	Not reaced
Licence: Generation	
Electricity Industry Metering Code clause 5.21(5)	
A Code participant must not request a test or audit unless the Code particip	
test or audit relates to a time or times at which the user was the current use participant is the IMO.	er or the Code
Observations	
Documents	Lianzana han na
meters and Western Power provides metering services at their Worsley sub	
Process	Compliance
The Licensee does not own meters to test and has not requested Western	
Issues	
None	
Recommendations	
None	
None	
Item 391	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 5.21(6)	
A Code participant must not make a test or audit request that is inconsisten	t with any access
arrangement or agreement.	
Observations	
Documents 🛛 Compliance	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	
meters and Western Power provides metering services at their Worsley sub	station.

Process ☐ Outcome ☐ Output ☐ Reporting ☐ Compliance ☐]
The Licensee does not own meters to test and has not requested Western Power to test.	
Issues	
N	
None	
Recommendations	
None	
Item 409 Compliance rating	
Licence condition 5.1	-
Electrica condition on	
Licence: Generation	
Clastricity Industry Matering Code player 5 27	
Electricity Industry Metering Code clause 5.27	
Upon request, a current user must provide the network operator with customer attribute	
information that it reasonably believes are missing or incorrect within the timeframes prescribed.	
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The Licensee does not	
own meters to test and has not requested Western Power to test.	
Process □ Outcome □ Output □ Reporting □ Compliance □	1
There have been no requests.	
Issues	
	_
None	
Recommendations	
None	
Hono	
Itam 416 Compliance rating	_
Item 416 Compliance rating Compliant 5	\neg
Item 416 Licence condition 5.1 Compliance rating Compliant 5	
Licence condition 5.1 Compliant 5 Licence: Generation	
Licence condition 5.1 Compliant 5 Licence: Generation Electricity Industry Metering Code clause 6.1(2)	
Licence condition 5.1 Compliant 5 Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules,	
Licence condition 5.1 Compliant 5 Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	
Licence condition 5.1 Compliant 5 Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules,	
Licence condition 5.1 Compliant 5 Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	
Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed. Observations Documents Compliant 5 Compliant 5	
Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed. Observations Documents Compliance Evidence: Interviewed David Schmidt, listed staff on site. Documents: The Licensee has no	
Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed. Observations Documents Compliance Evidence: Interviewed David Schmidt, listed staff on site. Documents: The Licensee has no meters and Western Power provides metering services at their Worsley substation.	
Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed. Observations Documents	
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Licence: Generation Electricity Industry Metering Code clause 6.1(2) A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed. Observations Documents	

notice by post, facsimile and electronic communication and must notify the	
telephone number for voice communication in connection with the Code.	network operator of a
Observations	
Documents ☑ Compliance ☑	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	e Licensee has no
meters and Western Power provides metering services at their Worsley su	
Process ☑ Outcome ☑ Output ☑ Reporting ☑	Compliance ☑
Western Power has the Licensee's relevant addresses.	
Issues	·
None Recommendations	
	
None	
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Item 420	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 7.2(4)	
A Code participant must notify its contact details to a network operator with	whom it has entered
into an access contract within 3 business days after the network operator's	
Observations	
Documents 🔲 Compliance	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	e Licensee has no
meters and Western Power provides metering services at their Worsley su	
	Compliance
Western Power has the Licensee's relevant addresses. There was no requ	() () () ()
	iest in the audit period.
Issues	lest in the audit period.
None	est in the audit period.
	est in the audit period.
None Recommendations	est in the audit period.
None	est in the audit period.
None Recommendations None	
None Recommendations None Item 421	Compliance rating
None Recommendations None	
None Recommendations None Item 421	Compliance rating
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation	Compliance rating
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5)	Compliance rating Not Rated
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any change	Compliance rating Not Rated e to the contact details
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5)	Compliance rating Not Rated e to the contact details
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any changit notified to the network operator at least 3 business days before the change Observations	Compliance rating Not Rated e to the contact details
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any changit notified to the network operator at least 3 business days before the change Observations	Compliance rating Not Rated e to the contact details ge takes effect.
None Recommendations None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any changit notified to the network operator at least 3 business days before the change Observations Documents Compliance	Compliance rating Not Rated e to the contact details ge takes effect.
None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any change it notified to the network operator at least 3 business days before the change observations Documents	Compliance rating Not Rated e to the contact details ge takes effect.
None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any changit notified to the network operator at least 3 business days before the change of the c	Compliance rating Not Rated e to the contact details ge takes effect. e Licensee has no bstation.
None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any change it notified to the network operator at least 3 business days before the change observations Documents	Compliance rating Not Rated e to the contact details ge takes effect. e Licensee has no bstation.
None Item 421 Licence condition 5.1 Licence: Generation Electricity Industry Metering Code clause 7.2(5) A Code participant must notify any affected network operator of any changit notified to the network operator at least 3 business days before the change of the c	Compliance rating Not Rated e to the contact details ge takes effect. e Licensee has no bstation.
None Item 421	Compliance rating Not Rated e to the contact details ge takes effect. e Licensee has no bstation.
None Item 421	Compliance rating Not Rated e to the contact details ge takes effect. e Licensee has no bstation.

	
Item 422 Licence condition 5.1	Compliance rating Compliant 5
Licence: Generation	Sylven in the many
Electricity Industry Metering Code clause 7.5 A Code participant must not disclose, or permit the disclosure of, confident to it under or in connection with the Code and may only use or reproduce for the purpose for which it was disclosed or another purpose contemplate.	tial information provided
Observations	by the second se
Documents ☑ Compliance ☑	The state of the s
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	
meters and Western Power provides metering services at their Worsley su	
Process ☑ Outcome ☑ Output ☑ Reporting ☑ There has been no disclosure of confidential information.	Compliance 🗵
Issues	
None	
Recommendations	
None	
None	
	· · · · · · · · · · · · · · · · · · ·
Item 423 Licence condition 5.1	Compliance rating Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 7.6(1) A Code participant must disclose or permit the disclosure of confidential ir required to be disclosed by the Code.	nformation that is
Observations	
Documents	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The meters and Western Power provides metering services at their Worsley su	
Process	
There has been no confidential information to be disclosed.	
Issues	
None	
Recommendations	
None	
Item 424 Licence condition 5.1	Compliance rating Not Rated
Licence: Generation	<u> </u>
Electricity Industry Metering Code clause 8.1(1)	
Representatives of disputing parties must meet within 5 business days aft disputing party to the other disputing parties and attempt to resolve the disconnection with the Electricity Industry Metering Code by negotiations in g	spute under or in
Observations	
Documents Compliance	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	
meters and Western Power provides metering services at their Worsley surprises □ Outcome □ Output □ Reporting □	Ibstation. Compliance
There have been no disputes (the Licensee has no meter information to d disputes with Western Power).	

Issues	• • • • • • • • • • • • • • • • • • • •
None	
Recommendations	
None	
	
Item 425 Licence condition 5.1	Compliance rating Not Rated
Licence: Generation	· · · · · · · · · · · · · · · · · · ·
Electricity Industry Metering Code clause 8.1(2) If a dispute is not resolved within 10 business days after the dispute is referengotiations, the disputing parties must refer the dispute to a senior managed disputing party who must meet and attempt to resolve the dispute by negoting Observations	ement officer of each
Documents Compliance	
Documents	e Licensee has no
meters and Western Power provides metering services at their Worsley sul	ostation.
Process	Compliance
There have been no disputes (the Licensee has no meter information to disputes with Western Power).	spute and has no
Issues	
None	
Recommendations	
None	
	
Item 426 Licence condition 5.1	Compliance rating Not Rated
Licence: Generation	
Electricity Industry Metering Code clause 8.1(3) If the dispute is not resolved within 10 business days after the dispute is ref management negotiations, the disputing parties must refer the dispute to the officer of each disputing party who must meet and attempt to resolve the dispuding good faith.	e senior executive
Observations	
Documents Compliance	
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The	
meters and Western Power provides metering services at their Worsley sul Process	Compliance
There have been no disputes (the Licensee has no meter information to dis	0 0 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
disputes with Western Power).	
Issues	
None	
Recommendations	
None	
Item 427	Compliance rating
Licence condition 5.1	Not Rated
Licence: Generation Electricity Industry Metering Code clause 8.1(4)	

If the dispute is resolved by representative negotiations, senior management negotiations or CEO negotiations, the disputing parties must prepare a written and signed record of the resolution and
adhere to the resolution.
Observations
Documents
Evidence: Interviewed David Schmidt, listed staff on site. Documents: The Licensee has no
meters and Western Power provides metering services at their Worsley substation.
Process □ Outcome □ Output □ Reporting □ Compliance □
There have been no disputes (the Licensee has no meter information to dispute and has no
disputes with Western Power).
Issues
None
Recommendations
None
11010
Item 428 Compliance rating
Licence condition 5.1 Not Rated
Licence: Generation
Licence. Generation
Electricity Industry Metering Code clause 8.3(2)
The disputing parties must at all times conduct themselves in a manner which is directed towards
achieving the objective of dispute resolution with as little formality and technicality and with as
much expedition as the requirements of Part 8 of the Code and a proper hearing and
determination of the dispute, permit. Observations
Observations
Documents
The Licensee has no meters and Western Power provides metering services at their Worsley
substation.
Process □ Outcome □ Output □ Reporting □ Compliance □
Evidence: Interviewed David Schmidt, listed staff on site. Documents: There have been no
disputes (the Licensee has no meter information to dispute and has no disputes with Western
Power).
Issues
None
Recommendations
None