



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

LANDFILL GAS & POWER PTY LTD RETAIL LICENCE ERL 11 PERFORMANCE AUDIT REPORT

Prepared By Kevan McGill
Date 18 August 2011



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Steve Gould
General manager Retail
Landfill Gas & power Pty Ltd
62 Ord Street
WEST PERTH WA 6000

Dear Dr Gould

Performance Audit Electricity Licence

The fieldwork on the performance audit of Retail Licence ERL 11, for the audit period (1 July 2008 to 30 June 2011) 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 maintained a good level of compliance with the licence conditions and integrity with the Licensee's reporting obligations. There are no non compliances noted.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Retail Licence (ERL 11) for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 24 August 2011

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1 Executive Summary

Landfill Gas & Power Pty Ltd (*LFGP*) holds an Electricity Retail Licence (ERL11) issued by the Economic Regulation Authority (*Authority*) under the Electricity Industry Act 2004. This performance audit was conducted in accordance with the guidelines¹ issued by the Economic Regulation Authority for the audit period (1 July 2008 to 30 June 2011) to assess Landfill Gas & Power's level of compliance with the licence conditions.

Landfill Gas and Power Pty Ltd operates in the SWIS with 87 retail customers who have about 350 metered connection points. The Electricity Licence requires Landfill Gas & Power Pty Ltd to provide the *Authority* with an audit report from an independent expert on a defined time scale. This is the second audit of the licence held by Landfill Gas & Power Pty Ltd.

1.1 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licence conditions and integrity with the Licensee's reporting obligations. There are no non compliances noted.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Retail Licence (ERL 11) for the audit period based on the relevant clauses referred to within the objectives section (Page 7) of this report.

A summary of the findings of the performance audit is given in section 1.2 below.

1.2 RATINGS

A risk assessment approach is used to develop the depth of audit required for each Obligation and is documented in an Audit Plan approved by the *Authority* prior to audit. A 5 level Audit Priority scale is used based on the combined rating for Inherent Risk and Control Adequacy defined in the following table. Following approval of the audit plan, a number of obligations were approved by the *Authority* for removal from the audit. The Landfill Gas & Power Pty Ltd obligations assessed in this audit, have a Audit Priority rating of 1, 4 or 5

	Adequacy of existing controls			
Inherent risk		Weak	Moderate	Strong
	High	Audit Priority 1	Audit Priority 2	
	Medium	Audit Priority 3	Audit Priority 4	
	Low	Audit Priority 5		

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

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

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
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 NON-COMPLIANT	1	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 total number of licence obligations assessed are summarised by audit priority ratings below.

		Audit Priority				
Assessment	Total	1	2	3	4	5
Compliant 5	40	1	0	0	31	8
Compliant 4	0	0	0	0	0	0
Compliant 3	0	0	0	0	0	0
Non-compliant 2	0	0	0	0	0	0
Significantly Non-compliant 1	0	0	0	0	0	0
Not Applicable	1	0	0	0	1	0
Not Rated	37	1	0	0	23	13

* Note Where an obligation was not exercised in the audit period, it was not possible to form an opinion about compliance and the item was not rated.

2 PERFORMANCE AUDIT

2.1 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 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 (July 2010)².

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Retail 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 Retail Licence through a combination of enquiries, examination of documents and detailed testing for Electricity Retail Licence ERL 11 for the Licensee.

² Economic Regulation Authority: Electricity Compliance Reporting Manual July 2010

2.2 AUDIT PERIOD

The audit period is 1 July 2008 to 30 June 2011.

2.3 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 non-audit 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.

2.4 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.

2.4.1 EXCLUDED CONDITIONS

Licence conditions applying to small use consumers have been excluded as the licensee has no small use consumers, accordingly conditions 88-89, 94 and 97-102 have been excluded from the audit. Conditions relating to the Electricity Corporations are not applicable (78-80, 90-92). Conditions relating to the Code of Conduct for the Supply of Electricity to Small Use Consumers (113 to 316 (299 in previous manual)) have been excluded as these apply to Small Use Consumers only. Conditions relating to being a supplier of last resort (93) have been deleted as the licensees' area has not been designated. As no individual performance standards have been applied, item 106 has been excluded.

2.5 LICENCE FOR REVIEW PERIOD

The audit/review period for the licence is from 1/7/08 to 30/6/11. During this period for each licence, three versions of the licence were in-force at different times.

Licence Version 1 (V1) – original - The licence was in force during the audit period from 1/7/08 to 28/1/09 (that is, approx 7 months) (Note: the licence references are reflected in the Electricity Compliance Reporting Manual dated July 2008)

Licence Version 2 (V2) – dated 29/1/09 - The licence was in force during the audit period from 29/1/09 to 12/1/11 (that is, approx 24 months) (Note: the licence conditions are reflected in the Electricity Compliance Reporting Manuals July 2010)

Licence Version 3 (V3) – dated 13/1/11 - The licence was in force during the audit period from 13/1/11 to 30/6/11 (that is, approx 6 months) (Note: the licence references are reflected in the Electricity Compliance Reporting Manual dated May 2011)

The only change from Licence V1 to V2 was that V2 included a changed definition of the customer, to be consistent with the definition in the *Electricity Industry Act 2004*.

Amendments to the *2008 Code of Conduct for the Supply of Electricity to Small Use Customers* (Code of Conduct) took effect from 1 July 2010 and are reflected in the Electricity Compliance Reporting Manual, dated July 2010 (However small use customers are not applicable to these licensees).

The licence references/conditions in Licence V2 will correspond to both the 2008 and 2010 Manuals but the new customer definition applies from 29/1/09 to 30/6/11 and this is legally reflected in the 2010 Manual. The auditor based the licence audit plans on V2 of the licence and the licence obligations listed in the 2010 Electricity Compliance Reporting Manual.

2.6 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 operating licence 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.

2.7 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 Licence 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 Perth office was visited.

2.8 FOLLOW UP FROM PREVIOUS AUDIT

There were no actions to follow up from previous audit.

2.9 AUDIT ROLES

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
 - Steve Gould, General Manager Retail
 - Stacey Farquharson, Senior Business Analyst

- McGill Engineering Services Pty Ltd
 - Kevan McGill

The audit was conducted during July to August 2011. Kevan McGill took about 100 hours on the audit.

2.10 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 Assessment Outcome - Operational/ Performance Audit Plan	K McGill	ASA 300 Planning ASA 315: Risk Assessments and Internal Controls AUS 808: Planning Performance 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 Assessment and testing of; <ul style="list-style-type: none">• The control environment• Information system• Compliance procedures• Compliance attitude	K McGill	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

2.11 RETAIL CUSTOMERS

Landfill Gas and Power Pty Ltd is a small retailer with 87 customers with about 350 metered connection points operating in the SWIS. There are no small use customers.

2.12 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licence conditions and there were no non compliances.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Retail (ERL 11) licence for the audit period based on the relevant clauses referred to within the scope section of this report.

2.13 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 detailed findings Page 18

Item	Licence obligation	Consequences	Likelihood	Inherent Risk	Adequacy of existing controls	Audit priority	Type	Rating							
Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Retail								1	2	3	4	5	N ^a	N ^R	
6	3.2(2) ³	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
7	3.4(1)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
8	3.5(3)	Moderate	Unlikely	Medium	Moderate	4	2							<input checked="" type="checkbox"/>	
9	3.6(2)	Moderate	Unlikely	Medium	Moderate	4	2							<input checked="" type="checkbox"/>	
16	3.9(1)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
17	3.9(2)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
18	3.9(3)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
19	3.9(4)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
23	4.2(2)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
24	4.3	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
25	4.4(1)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
26	4.4(2)	Moderate	Unlikely	Medium	Moderate	4	2							<input checked="" type="checkbox"/>	
27	4.5(1)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
28	4.6(3)	Moderate	Unlikely	Medium	Moderate	4	2							<input checked="" type="checkbox"/>	
29	4.7	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			

³ Electricity Industry Customer Transfer Code number

Item	Licence obligation	Consequences	Likelihood	Inherent Risk	Adequacy of existing controls	Audit priority	Type	Rating							
								1	2	3	4	5	N ^a	N ^R	
Electricity Industry (Licence Conditions) regulations r 5(2) - Customer Transfer Code Retail															
30	4.8(2)	Moderate	Unlikely	Medium	Moderate	4	2								✓
34	4.9(6)	Moderate	Unlikely	Medium	Moderate	4	2						✓		
39	4.11(3)	Moderate	Unlikely	Medium	Moderate	4	2								✓
40	4.12(3)	Minor	Unlikely	Low	Moderate	5	NR						✓		
43	4.15	Minor	Unlikely	Low	Moderate	5	NR								✓
44	4.16	Moderate	Unlikely	Medium	Moderate	4	2						✓		
45	4.17	Moderate	Unlikely	Medium	Moderate	4	2						✓		
48	5.1(4)	Moderate	Unlikely	Medium	Moderate	4	2						✓		
49	6.2	Moderate	Unlikely	Medium	Moderate	4	2						✓		
52	6.4(1)	Moderate	Unlikely	Medium	Moderate	4	2								✓
53	6.4(2)	Moderate	Unlikely	Medium	Moderate	4	2								✓
54	6.6	Moderate	Unlikely	Medium	Moderate	4	2						✓		
55	7.1(1)	Minor	Unlikely	Low	Moderate	5	NR								✓
56	7.1(2)	Minor	Unlikely	Low	Moderate	5	NR								✓
57	7.1(3)	Moderate	Unlikely	Medium	Moderate	4	2								✓
58	7.2(4)	Minor	Unlikely	Low	Moderate	5	NR								✓
59	7.3(2)	Minor	Unlikely	Low	Moderate	5	NR								✓
68	A6.2(a) ⁴	Minor	Unlikely	Low	Moderate	5	NR						✓		
69	A6.2(b)	Moderate	Unlikely	Medium	Moderate	4	2						✓		
70	A6.6	Minor	Unlikely	Low	Moderate	5	NR						✓		
71	A6.7	Minor	Unlikely	Low	Moderate	5	NR						✓		
Licence conditions Retail								1	2	3	4	5	N ^a	N ^R	
81.	22.1 Act s13(1)	Minor	Unlikely	Low	Moderate	5	NR						✓		
85.	4.1 Act s17(1)	Major	Probable	High	Weak	1	NR						✓		
86	5.1 Act s31(3)	Major	Probable	High	Weak	1	NR								✓
87.	5.1 Act s41(6)	Moderate	Unlikely	Medium	Moderate	4	2								✓
96	5.1Act s115(2)	Moderate	Unlikely	Medium	Moderate	4	2						✓		
105	20.1 Act s11	Moderate	Unlikely	Medium	Moderate	4	2						✓		
107	22.2 Act s11	Moderate	Unlikely	Medium	Moderate	4	2						✓		
109	23.1 Act s11	Moderate	Unlikely	Medium	Moderate	4	2								✓
110	24.1 Act s11	Moderate	Unlikely	Medium	Moderate	4	2						✓		

⁴ Electricity Industry Customer Transfer Code Annex 6

Item	Licence obligation	Consequences	Likelihood	Inherent Risk	Adequacy of existing controls	Audit priority	Type	Rating							
								1	2	3	4	5	N ^a	N ^R	
Licence conditions Retail															
111	25.2 Act s11	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
112	26.1 Acts11	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
Licence Clause 5.1 Metering Code Retail Item number 2010 manual (2008 manual)								1	2	3	4	5	N ^a	N ^R	
326 (309)	MC 3.5(6)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
336 (319)	MC 3.11(3)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
348 (331)	MC 3.16(5)	Moderate	Unlikely	Medium	Moderate	4	2						<input checked="" type="checkbox"/>		
359 (342)	MC 3.27	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
366 (349)	MC 4.4(1)	Minor	Unlikely	Low	Moderate	5	NR					<input checked="" type="checkbox"/>			
367 (350)	MC 4.5(1)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
368 (351)	MC 4.5(2)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
380 (363)	MC 4.5(2)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
382 (365)	MC 5.5(3)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
393 (376)	MC 5.16	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
394 (377)	MC 5.17(1)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
395 (378)	MC 5.18	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
396 (379)	MC 5.19(1)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
397 (380)	MC 5.19(2)	Minor	Unlikely	Low	Moderate	5	NR					<input checked="" type="checkbox"/>			
398 (381)	MC 5.19(3)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
399 (382)	MC 5.19(4)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
401 (384)	MC 5.19(6)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
407 (390)	MC 5.21(5)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
408 (391)	MC 5.21(6)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
426 (409)	MC 5.27	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
433 (416)	MC 6.1(2)	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
435 (418)	MC 7.2(1)	Minor	Unlikely	Low	Moderate	5	NR					<input checked="" type="checkbox"/>			
437 (420)	MC 7.2(4)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
438 (421)	MC 7.2(5)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
439 (422)	MC 7.5	Moderate	Unlikely	Medium	Moderate	4	2					<input checked="" type="checkbox"/>			
440 (423)	MC 7.6(1)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>
441 (424)	MC 8.1(1)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
442 (425)	MC 8.1(2)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
443 (426)	MC 8.1(3)	Minor	Unlikely	Low	Moderate	5	NR								<input checked="" type="checkbox"/>
444 (427)	MC 8.1(4)	Moderate	Unlikely	Medium	Moderate	4	2								<input checked="" type="checkbox"/>

Item	Licence obligation	Consequences	Likelihood	Inherent Risk	Adequacy of existing controls	Audit priority	Type	Rating						
Licence Clause 5.1 Metering Code Retail Item number 2010 manual (2008 manual)								1	2	3	4	5	N ^a	N ^R
445 (428)	MC 8.3(2)	Minor	Unlikely	Low	Moderate	5	NR							<input checked="" type="checkbox"/>

2.14 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.

2.14.1 AUDIT RESULTS AND RECOMMENDATIONS

Summary of significant results

No non compliances have been recorded.

2.14.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

There are no items requiring corrective measures.

2.14.3 SUGGESTIONS FOR IMPROVEMENT

There are no items with suggestions for improvement.

2.14.4 POST AUDIT IMPLEMENTATION PLAN

The Licensee would have provided a separate post audit plan but there are no items to address.

2.15 DETAILED FINDINGS

2.15.1 AUDIT WORK UNDERTAKEN

Interviews and enquiries were conducted to:

- Understand the control environment by determining the responsibility matrix and key control points
- Obtain the policies and procedures for managing licences and licensed areas; and
- Identify the information systems and processes employed to manage licences and licensed areas
- Determine the level of understanding of the systems and processes for managing licences and licensed areas
- In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we examined the processes and

assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

2.16 AUDIT EVIDENCE

The following was considered in the audit.

- Retail Licence
- Past audit
- Contact details
- Verifiable consent forms
- Licence fees/receipts
- Access contract information
- Accounting standards statement
- Sample communication with ERA
- Access conditions
- Compliance reports
- Transfer screen shots – reasons for transfer

2.17 DETAILED AUDIT FINDINGS

The following sets out the audit findings

2.17.1 ELECTRICITY INDUSTRY CUSTOMER TRANSFER CODE – LICENCE CONDITIONS AND OBLIGATIONS

Item 6	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.2(2) A retailer must submit a separate data request for each exit point unless otherwise agreed.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
All transfers are conducted with Western Power's portal. The portal does not allow data requests for more than one NMI at a time. The network operator is responsible for meters (NMI) at each exit point.	
Issues	
None	
Recommendations	
None	

Item 7	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.4(1) A retailer, unless otherwise agreed, must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
All transfers are conducted electronically with Western Power's portal. The portal does not allow data requests for more than the prescribed number (20) per day.	
Issues	
None	
Recommendations	
None	

Item 8	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Not Rated
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.5(3) A retailer must withdraw a request for historical consumption data if the contestable customer's	

verifiable consent ceases to apply before the network operator provides the historical consumption data.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal, consent documents									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests for historical consumption data where the contestable customer's verifiable consent has ceased to apply.									
Issues									
None									
Recommendations									
None									

Item 9	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Not Rated
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.6(2) A retailer must pay any reasonable costs incurred by the network operator for work performed in relation to a withdrawn request for historical consumption data.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no withdrawn requests for historical consumption data and therefore no costs to be paid.	
Issues	
None	
Recommendations	
None	

Item 16	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.9(1) A retailer may only use data relating to a contestable customer to provide a contestable customer with a quotation for the supply of electricity by the retailer to the contestable customer or to initiate a transfer in relation to the contestable customer.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee only uses data to provide a contestable customer with a quotation for the supply of electricity by the retailer to the contestable customer or to initiate a transfer in relation to the contestable customer. There have been no complaints about use of data.	
Issues	
None	

Recommendations
None

Item 17 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.9(2) A retailer must not aggregate a contestable customer's historical consumption data with that of other contestable customers for the purposes of internal business development, if requested not to do so by the customer.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There have been no requests to not use data for internal development and is not used in this manner. Data is aggregated for the purpose of checking IMO invoices issues as part of the necessary operation of the market. There have been no complaints about use of data.	
Issues	
None	
Recommendations	
None	

Item 18 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.9(3) A retailer must not disclose a contestable customer's data to any other person without the verifiable consent of the contestable customer, except in the circumstances defined.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal, consent documents	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The customer's data have been provided where consent has been given for purposes such as to consultants for carbon footprint evaluation. There have been no complaints about use of data.	
Issues	
None	
Recommendations	
None	

Item 19 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 3.9(4) A retailer must keep a copy of the verifiable consent received from a contestable customer for two years.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western	

Power's portal, consent documents									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Sample copies of verifiable consent documents of current and past customers sighted. The policy is to not dispose of any customer documents.									
Issues									
None									
Recommendations									
None									

Item 23					Compliance rating				
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Compliant 5				
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.2(2) A retailer must submit a separate customer transfer request for each exit point unless otherwise agreed.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers are conducted electronically with Western Power's portal. The portal does not allow transfer requests for more than one NMI at a time. The network operator is responsible for allocating NMI (meters) to exit points.									
Issues									
None									
Recommendations									
None									

Item 24					Compliance rating				
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Compliant 5				
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.3									
A retailer's reason for a transfer must be specified in the customer transfer request form as either to transfer a contestable customer to the retailer which submitted the customer transfer request or to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers are conducted electronically with Western Power's portal. The portal provides for transfer reasons of either "Erroneous Transfer" or "New Customer Transfer" and requires that one of them be checked as a condition of acceptance.									
Issues									
None									
Recommendations									
None									

Item 25	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating
		Compliant 5
Licence: Retail		
Electricity Industry Customer Transfer Code Clause 4.4(1) A retailer may only submit a customer transfer request if it has an access contract for the network, unless it is to reverse an erroneous transfer.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal, access contract documents		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has an access contract with Western Power. It has not needed to make any erroneous transfer corrections that it created but has received erroneous transfer information from others which have been corrected by others.		
Issues		
None		
Recommendations		
None		

Item 26	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating
		Not Rated
Licence: Retail		
Electricity Industry Customer Transfer Code Clause 4.4(2) A retailer that submits a customer transfer request to reverse an erroneous transfer must ensure the transfer was made in error and, if it is an incoming retailer, confirm the identity of the previous retailer.		
Observations		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal		
Process	<input type="checkbox"/>	Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no erroneous transfers to reverse.		
Issues		
None		
Recommendations		
None		

Item 27	Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating
		Compliant 5
Licence: Retail		
Electricity Industry Customer Transfer Code Clause 4.5(1) A retailer, unless otherwise agreed, must submit a customer transfer request electronically and must not submit more than 20 customer transfer requests in a business day or with the same nominated transfer date.		
Observations		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal		
Process	<input checked="" type="checkbox"/>	Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee only uses Western Power's electronic portal to make transfers. The portal limits customer transfers to the prescribed limit of 20 (not more than a prescribed number of customer transfer requests in a business day or with the same nominated transfer date).		

Issues
None
Recommendations
None

Item 28					Compliance rating				
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Not Rated				
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.6(3) A retailer must withdraw a customer transfer request if the contestable customer's verifiable consent ceases to apply before the transfer occurs.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal, consent documents									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no transfer requests where customer consent ceases to apply. The customers have a supply contract in addition to the customer consent which would mean withdrawing consent is a breach of contract.									
Issues									
None									
Recommendations									
None									

Item 29					Compliance rating				
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Compliant 5				
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.7									
A retailer must nominate a transfer date in a customer transfer request in accordance with specified timeframes, except if the customer transfer request is to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee only uses Western Power's electronic portal to make transfers. The portal limits customer transfers to the prescribed requirements. There have been no erroneous transfers to reverse.									
Issues									
None									
Recommendations									
None									

Item 30	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Not Rated
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 4.8(2) A retailer must pay any reasonable costs incurred by a network operator for providing and/or installing a meter if a customer transfer request is withdrawn.	

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no transfer requests withdrawn and therefore no costs to pay.									
Issues									
None									
Recommendations									
None									

Item 34							Compliance rating		
Electricity Industry (Licence Conditions) Regulations regulation 5(2)							Compliant 5		
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.9(6) A network operator and retailer must agree to a revised nominated transfer date in certain circumstances.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee only uses Western Power's electronic portal to make transfers. In most cases the transfer has not required a revised date and where a revised date is required the Licensee has accepted the date offered.									
Issues									
None									
Recommendations									
None									

Item 39							Compliance rating		
Electricity Industry (Licence Conditions) Regulations regulation 5(2)							Not Rated		
Licence: Retail									
Electricity Industry Customer Transfer Code 4.11(3) A network operator and the retailer must take certain action if the contestable customer's meter is not read on the nominated transfer date.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The meters are read half hourly and there have been no instances of meters not read on the transfer date.									
Issues									
None									
Recommendations									
None									

Item 40					Compliance rating				
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Compliant 5				
Licence: Retail									
Electricity Industry Customer Transfer Code 4.12(3) The parties to an access contract must negotiate in good faith any necessary amendments to the access contract arising from certain circumstances.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal, amended access contract documents									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
Amended access contract sighted. The Licensee stated that it had been negotiated in good faith and no complaints have been made.									
Issues									
None									
Recommendations									
None									

Item 43							Compliance rating		
Electricity Industry (Licence Conditions) Regulations regulation 5(2)							Not Rated		
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.15									
In the case of a transfer to reverse an erroneous transfer, a network operator and all affected retailers (and the independent market operator if applicable) must act in good faith to ensure that the rights and obligations of the affected contestable customer are as they would have been had the erroneous transfer not occurred.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no erroneous transfers by the Licensee. There have been erroneous transfers to the Licensee by others and these have been corrected by others.									
Issues									
None									
Recommendations									
None									

Item 44							Compliance rating		
Electricity Industry (Licence Conditions) Regulations regulation 5(2)							Compliant 5		
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 4.16 An incoming retailer must retain a copy of a verifiable consent given by a contestable customer in relation to the lodgement of a customer transfer request for two years, except in the case of a customer transfer request to reverse an erroneous transfer.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal, consent document									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>

Verifiable consent documents are retained and the policy is not to dispose of any customer documents. There have been no erroneous transfers by Licensee.
Issues
None
Recommendations
None

Item 45	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 4.17 A previous retailer must not bill a contestable customer for charges incurred after the transfer time, except in the case of an erroneous transfer.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
Western Power ceases to provide energy data after transfer date so there is nothing to bill and no bills have been issued. There have been no erroneous transfers by Licensee.	
Issues	
None	
Recommendations	
None	

Item 48	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 5.1(4) A network operator and a retailer must comply with approved communication rules.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal. Communication with Western Power's account manager is via email and standard formats. There have been no actions outside the communication rules.	
Issues	
None	
Recommendations	
None	

Item 49	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 6.2 A licensee's notice in relation to a data request or customer transfer request must identify the exit	

point to which it relates.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal. Western Power use NMI as unique identifier. The network operator is responsible for allocating NMI to exit points.									
Issues									
None									
Recommendations									
None									

Item 52								Compliance rating	
Electricity Industry (Licence Conditions) Regulations regulation 5(2)								Not Rated	
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 6.4(1) A retailer must notify its contact details to a network operator within three business days of a request.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no request for contact details. Contact details have not changed in audit period.									
Issues									
None									
Recommendations									
None									

Item 53								Compliance rating	
Electricity Industry (Licence Conditions) Regulations regulation 5(2)								Not Rated	
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 6.4(2) A retailer must notify any change in its contact details to a network operator at least three business days before the change takes effect.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Contact details have not changed in audit period.									
Issues									
None									
Recommendations									
None									

Item 54 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Clause 6.6 A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal. Other communications are by email to the correct addresses.	
Issues	
None	
Recommendations	
None	

Item 55 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Not Rated
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 7.1(1) For a dispute in respect of a matter under or in connection with the EICTC ⁵ , any disputing party must meet within five business days of a request from another disputing party and attempt to resolve the dispute by negotiations in good faith.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents:	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes.	
Issues	
None	
Recommendations	
None	

Item 56 Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliance rating Not Rated
Licence: Retail	
Electricity Industry Customer Transfer Code Clause 7.1(2) If the negotiations in 7.1(1) of the EICTC 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 by negotiations in good faith.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents:	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disputes.	

⁵ EICTC- Electricity Industry Customer Transfer Code

Issues
None
Recommendations
None

Item 57					Compliance rating				
Electricity Industry (Licence Conditions) Regulations regulation 5(2)					Not Rated				
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 7.1(3) If the dispute is resolved, the disputing parties must prepare a written and signed record of the resolution and adhere to the resolution.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents:									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes.									
Issues									
None									
Recommendations									
None									

Item 58							Compliance rating		
Electricity Industry (Licence Conditions) Regulations regulation 5(2)							Not Rated		
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 7.2(4) A disputing party that refers a dispute to the <i>Authority</i> must give notice to the <i>Authority</i> of the nature of the dispute, including specified details.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents:									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes.									
Issues									
None									
Recommendations									
None									

Item 59							Compliance rating		
Electricity Industry (Licence Conditions) Regulations regulation 5(2)							Not Rated		
Licence: Retail									
Electricity Industry Customer Transfer Code Clause 7.3(2) A disputing party must at all times conduct itself in a manner which is directed towards achieving the objectives in clause 7.3(1) of the EICTC.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents:									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no disputes.									

Issues
None
Recommendations
None

Item 68	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Clause Annex 6 A6.2(a) A network operator and a retailer must use reasonable endeavours to ensure that its information system on which electronic communications are made is operational 24 hours a day and 7 days a week.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal which provides the prescribe availability. Other communications are by email and are available 24 hours a day and 7 days a week.	
Issues	
None	
Recommendations	
None	

Item 69	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Clause Annex 6 A6.2(b) A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal which provides the prescribed automatic responses.	
Issues	
None	
Recommendations	
None	

Item 70	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Clause Annex 6 A6.6	

The originator of an electronic communication must identify itself in the communication.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal which provides the prescribed identification. Email also provides identification.									
Issues									
None									
Recommendations									
None									

Item 71	Compliance rating
Electricity Industry (Licence Conditions) Regulations regulation 5(2)	Compliant 5
Licence: Retail	
Electricity Industry Customer Transfer Clause Annex 6 A6.7 The originator of an electronic communication must use reasonable endeavours to adopt a consistent data format for information over time, to facilitate any automated processing of the information by the addressee.	
Observations	
Documents	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Viewed Western Power's portal	
Process	<input checked="" type="checkbox"/>
Outcome	<input checked="" type="checkbox"/>
Output	<input checked="" type="checkbox"/>
Reporting	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>
All transfers and data transactions are done electronically with Western Power's portal which has a consistent data format.	
Issues	
None	
Recommendations	
None	

2.17.2 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 81	Compliance rating
Retail Licence condition 22.1	Compliant 5
Licence: Retail	
<i>Electricity Industry Act section 13(1)</i> A Licensee must, not less than once every 24 months, or as otherwise notified by the <i>Authority</i> , provide the <i>Authority</i> with a performance audit conducted by an independent expert acceptable to the <i>Authority</i> .	
Observations	
Documents	<input checked="" type="checkbox"/>
Compliance	<input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: The Licensee contracted with the auditor to carry out the audit. The documents were forwarded to the <i>Authority</i> as part of the approval of the auditor. Licensee received approval from the <i>Authority</i> for audit scope and appointment of auditor.	

Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee contracted with the auditor to carry out the audit to meet the requirements. The last audit was also conducted to requirements.									
Issues									
None									
Recommendations									
None									

Item 85 Retail Licence condition 4.1	Compliance rating Compliant 5
Licence: Retail	
<i>Electricity Industry Act section 17(1)</i> A Licensee must pay to the <i>Authority</i> 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	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Include invoices and receipts	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Receipts sighted and comply with requirements.	
Issues	
None	
Recommendations	
None	

Item 86 Retail Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Act section 31(3)</i> 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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee has not caused a delay and has no capacity to affect the extent or duration of any interruption, suspension or restriction of the supply of electricity.	
Issues	
None	
Recommendations	
None	

Item 87 Retail Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Act section 41(6)</i> A Licensee must pay the costs of taking an interest in land or an easement over land.	

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no interests/easements taken in land in the audit period to assess compliance.									
Issues									
None									
Recommendations									
None									

Item 96						Compliance rating			
Retail Licence condition 5.1						Compliant 5			
Licence: <i>Transmission, Retail</i>									
<i>Electricity Industry Act section 115(2)</i>									
A Licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst Documents: Not applicable.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
This clause is understood to refer to situations in which a network user 'hoards' access rights to network capacity that it isn't actually using for the purpose of denying access to a 3 rd party. LFGP's capacity reservations have been reviewed against its operational needs to confirm that there is no significant unused capacity and therefore it could not engage in conduct for the purpose of hindering or prohibiting access.									
Issues									
None									
Recommendations									
None									

Item 105						Compliance rating			
Electricity Industry Act section 11						Compliant 5			
Licence: <i>Retail</i>									
<i>Retail Licence Condition 20.1</i>									
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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: The annual report declaration by the financial auditor has been sighted.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Landfill Gas and Power annual report shows compliance with accounting standards. However as the Licensee is not a reporting entity compliance with accounting standards is met other than the disclosure requirements (which are not applicable).									
Issues									
None									
Recommendations									
None									

Item 107 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: Retail	
<i>Retail Licence Condition 22.2</i> A Licensee must comply, and require its auditor to comply, with the <i>Authority's</i> standard audit guidelines dealing with the performance audit.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: The audit plan was forwarded to the <i>Authority</i> , approval of the auditor obtained prior to appointment.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has contracted with the auditor to comply with the requirements.	
Issues	
None	
Recommendations	
None	

Item 109 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: Retail	
<i>Retail Licence Condition 23.1</i> A Licensee must report to the <i>Authority</i> , in the manner prescribed, if a Licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a Licensee's ability to meet its obligations.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The Licensee is not under external administration so not able to assess compliance with advice requirements.	
Issues	
None	
Recommendations	
None	

Item 110 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: Retail	
<i>Retail Licence Condition 24.1</i> A Licensee must provide the <i>Authority</i> , in the manner prescribed, any information the <i>Authority</i> requires in connection with its functions under the Electricity Industry Act.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. The Retail Manager advised that there have been no requests for information from the <i>Authority</i> other than Performance Audit, Compliance Report. Documents: The reporting manual returns have been sighted.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee has met the reporting manual requirements.	
Issues	
None	

Recommendations
None

Item 111 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: Retail	
<i>Retail Licence Condition 25.2</i> A Licensee must publish any information it is directed by the <i>Authority</i> to publish, within the timeframes specified.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The <i>Authority</i> has not directed any information to be published so unable to assess compliance with publishing requirements.	
Issues	
None	
Recommendations	
None	

Item 112 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: Retail	
<i>Retail Licence Condition 26.1</i> Unless otherwise specified, all notices must be in writing.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Sample communication with ERA sighted.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
No notices have been required by the <i>Authority</i> . All material communication with the <i>Authority</i> is in writing.	
Issues	
None	
Recommendations	
None	

2.17.3 ELECTRICITY INDUSTRY METERING CODE – LICENCE CONDITIONS AND OBLIGATIONS (ALL LICENCE CONDITION LICENCE CLAUSE 5.1)

Item 326 (309) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 3.5(6)</i> 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 between it and the user.	

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The charges by the network operator are according to the access contract. This is an obligation on the network operator.									
Issues									
None									
Recommendations									
None									

Item 336 (319) Licence condition 5.1					Compliance rating Compliant 5				
Licence: Retail									
<i>Electricity Industry Metering Code clause 3.11(3)</i> A Code participant who becomes aware of an outage or malfunction of a metering installation must advise the network operator as soon as practicable.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable.									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has advised the network operator when erroneous data has been presented, being indicative of a malfunction, and the data has been rectified.									
Issues									
None									
Recommendations									
None									

Item 348 (331) Licence condition 5.1						Compliance rating Not Applicable			
Licence: Retail									
<i>Electricity Industry Metering Code clause 3.16(5)</i> A network operator or a user may require the other to negotiate and enter into a written service level agreement in respect of the matters in the metrology procedure dealt with under clause 3.16(4) of the Code.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no accumulation meters to be modelled, so 3.16(4) does not apply and consequently 3.16(5) which depends on 3.16(4) also does not apply.									
Issues									
None									
Recommendations									
None									

Item 359 (342) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	

<i>Electricity Industry Metering Code clause 3.27</i> 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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee uses Western Power for meter installations.									
Issues									
None									
Recommendations									
None									

Item 366 (349)						Compliance rating			
Licence condition 5.1						Compliant 5			
Licence: Retail									
<i>Electricity Industry Metering Code clause 4.4(1)</i> A network operator and affected Code participants must liaise together to determine the most appropriate way to resolve a discrepancy between energy data held in a metering installation and data held in the metering database.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The Licensee has no capacity to see the metering installations. Where there has been erroneous data (null or zero) it has been rectified after liaison with the network operator.									
Issues									
None									
Recommendations									
None									

Item 367 (350)							Compliance rating		
Licence condition 5.1							Not Rated		
Licence: Retail									
Electricity Industry Metering Code clause 4.5(1)									
A Code participant must not knowingly permit the registry to be materially inaccurate.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee has no capacity to see the registry. The Licensee has not been aware of any registry issues. There have been no customer (Code participants) complaints.									
Issues									
None									
Recommendations									
None									

Item 368 (351) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 4.5(2)</i> If a Code participant (other than a network operator) becomes aware of a change to or an inaccuracy in an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No errors to the registry have been advised from customers The Licensee has not been aware of any standing data (registry) issues.	
Issues	
None	
Recommendations	
None	

Item 380 (363) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.4(2)</i> A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No requests were made of users (customers) or Licensee. The Meters are read half hourly so they meet the read once a year requirement.	
Issues	
None	
Recommendations	
None	

Item 382 (365) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.5(3)</i> 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	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There has been no charge for data.	
Issues	
None	

Recommendations
None

Item 393 (376) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.16</i> A user that collects or receives energy data from a metering installation must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Users (and Licensee) do not collect or receive energy data to send to network operator.	
Issues	
None	
Recommendations	
None	

Item 394 (377) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.17(1)</i> A user must provide standing data and validated (and where necessary substituted or estimated) energy data to the user's customer, to which that information relates, where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Standing and validated energy data is provided on invoices as required. Applicable enactments such as the code of conduct do not apply as there are no small use consumers. There is no other enactment to provide data but the contracts provide for standing and energy data for billing purposes. The data provided is that received from the network operator including where necessary substituted or estimated data. The Licensee does not provide metering services (Western Power provides these services).	
Issues	
None	
Recommendations	
None	

Item 395 (378) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.18</i> A user that collects or receives information regarding a change in the energisation status of a	

metering point must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No change in energisation status occurred in the audit period.									
Issues									
None									
Recommendations									
None									

Item 396 (379) Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 5.19(1)</i> A user must, when requested by the network operator acting in accordance with good electricity industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no request to collect information.									
Issues									
None									
Recommendations									
None									
Management Actions									
Not applicable									

Item 397 (380) Licence condition 5.1							Compliance rating Compliant 5		
Licence: <i>Retail</i>									
<i>Electricity Industry Metering Code clause 5.19(2)</i> A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
For their customers, the Licensee has copies of Western Power's records. Contacts lists and address, site and customer attributes and sample advice to customers sighted.									
Issues									
None									
Recommendations									
None									

Item 398 (381) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(3)</i> A user must, after becoming aware of any change in a site's prescribed attributes, notify the network operator of the change within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no change to site attributes. There has been no advice from users. The license uses Western Power's service request form for new customers.	
Issues	
None	
Recommendations	
None	

Item 399 (382) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(4)</i> 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 fact.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No sensitive load exists for Licensee's customers.	
Issues	
None	
Recommendations	
None	

Item 401 (384) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute that results from the provision of standing data by the network operator to the user.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no provision of standing data by the network operator to the user.	
Issues	
None	

Recommendations
None

Item 407 (390) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a test or audit unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code participant is the IMO.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
When data was received that had nulls or zeroes the Western Power Service order request form was used to obtain a test. The Licensee paid the costs where the meter was not faulty. The Licensee is a code participant.	
Issues	
None	
Recommendations	
None	

Item 408 (391) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.21(6)</i> A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The requests were in accordance with the access agreement.	
Issues	
None	
Recommendations	
None	

Item 426 (409) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 5.27</i> 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	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									

Item 433 (416) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 6.1(2)</i> 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	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The Licensee only uses the Western Power portal to make all metering transactions and thus meet compliance with Western Power's rules, procedures, agreements and criteria.	
Issues	
None	
Recommendations	
None	

Item 435 (418) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 7.2(1)</i> 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.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The requirement is satisfied as users can be contacted by post, facsimile or electronic communication means. The Network operator has the telephone number. There have been no complaints from users.	
Issues	
None	
Recommendations	
None	

Item 437 (420) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Retail</i>	
<i>Electricity Industry Metering Code clause 7.2(4)</i>	

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 request.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Network operator has made no requests.									
Issues									
None									
Recommendations									
None									

Item 438 (421) Licence condition 5.1						Compliance rating Not Rated			
Licence: Retail									
<i>Electricity Industry Metering Code clause 7.2(5)</i> A Code participant must notify any affected network operator of any change to the contact details it notified to the network operator at least 3 business days before the change takes effect.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no change to contact details.									
Issues									
None									
Recommendations									
None									

Item 439 (422) Licence condition 5.1						Compliance rating Compliant 5			
Licence: Retail									
<i>Electricity Industry Metering Code clause 7.5</i> A Code participant must 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.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
The data systems have secure access. The licensee has quality management procedures for retaining confidential information. There is no evidence of complaints about disclosure of confidential information.									
Issues									
None									
Recommendations									
None									

Item 440 (423) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 7.6(1)</i> A Code participant must disclose or permit the disclosure of confidential information that is required to be disclosed by the Code.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There is no information required to be disclosed. The licensee has quality management procedures for handling confidential information.	
Issues	
None	
Recommendations	
None	

Item 441 (424) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 8.1(1)</i> 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 under or in connection with the Electricity Industry Metering Code by negotiations in good faith.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	
Recommendations	
None	

Item 442 (425) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 8.1(2)</i> 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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	

Recommendations
None

Item 443 (426) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 8.1(3)</i> 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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	
Recommendations	
None	

Item 444 (427) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 8.1(4)</i> 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	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	
Recommendations	
None	

Item 445 (428) Licence condition 5.1	Compliance rating Not Rated
Licence: Retail	
<i>Electricity Industry Metering Code clause 8.3(2)</i> 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	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>

Evidence: interviewed Retail Manager. Senior Business Analyst. Documents: Not applicable									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no metering disputes in the audit period.									
Issues									
None									
Recommendations									
None									