



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

ATCO Power Australia (Karratha) Pty Ltd Electricity Generation Licence EGL 21 Performance Audit

Prepared By Kevan McGill
Date 19 January 2012



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Dean Rodgers
Station Manager
ATCO Power Australia (Karratha) Pty Ltd
Stove Hill Road
Karratha WA 6714

Dear Mr Rodgers

Performance Audit Electricity Licence

The fieldwork on the performance audit of Generation Licence EGL 21 for the audit period (19 December 2008 to 30 August 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 3 non-complying items noted.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence EGL 21 for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 19 January 2012

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1 Executive Summary

ATCO Power Australia (Karratha) Pty Ltd (ATCO) holds Generation Licence EGL 21 issued by the Economic Regulation Authority (*Authority*) under the Electricity Industry Act 2004. This performance audit was conducted in accordance with the guidelines issued by the *Authority* for the audit period (19 December 2008 to 30 August 2011) to assess the Licensee’s level of compliance with the licence conditions.

ATCO operates a generation system in Karratha. There is one principal customer (Horizon Power which supplies the fuel and retails the resulting electricity. The power purchase agreement pays for time operated and not for electrical energy).

The records and areas covered by the Licence were inspected and interviews were also held with key personnel at the operational site (Karratha).

The Electricity Licence requires the Licensee to provide the *Authority* with an audit report from an independent expert on a defined time scale. This is the first audit of the licence held by ATCO.

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 3 non-compliance noted.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence EGL 21 for the audit period based on the relevant clauses referred to within the objectives section (Page 8) 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. All of the Licensee’s obligations assessed in this audit, have an Audit Priority rating of 4 or 5.

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

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.

Assessment	Total	Audit Priority				
		1	2	3	4	5
Compliant 5	10	0	0	0	5	5
Compliant 4	0	0	0	0	0	0
Compliant 3	1	0	0	0	1	0
Non-compliant 2	3	0	0	0	3	0
Significantly Non-compliant 1	0	0	0	0	0	0
Not Applicable	1	0	0	0	1	0
Not Rated	28	0	0	0	18	10

* 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.

1.2.1 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

The actions requiring corrective measures are:

Item	Issue	Recommended Action
451	There has been a change to the head office contact details which was not advised within 3 days. The operational	Establish a time related process in the maintenance IT system (MEX) to

	communications address had not changed and the network operator was not affected.	manage all regulatory obligations.
--	---	------------------------------------

Item 103 was also not compliant but the action is already completed.

Item	Issue	Recommended Action
105	The fees have been paid but not all on time.	Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.

1.2.2 SUGGESTIONS FOR IMPROVEMENT

There is a suggestion for improvement.

Item	Issue	Recommended Action
124	The Licensee has met the reporting manual requirements but the 2011 report while late was outside the audit period.	Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.

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 (May 2011)¹.

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

The audit was conducted in a manner consistent with Australian Auditing Standards (AUS) 808 "Planning Performance Audits" and AUS 806 "Performance Auditing". McGill Engineering Services Pty Ltd evaluated the adequacy and effectiveness of the controls and performance by the Licensee relative to the standards referred in the Generation Licence through a combination of enquiries, examination of documents and detailed testing for Generation Licence EGL 21 for the Licensee.

¹ Electricity compliance reporting manual, May 2011

2.2 AUDIT PERIOD

The audit period is 19 December 2008 to 30 August 2011. This is the first audit.

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
- there is no close family relationship with a Licensee, its directors, officers or employees, and
- the auditor 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.

2.5 EXCLUDED CONDITIONS

As no individual performance standards have been applied, item 120 has been excluded.

ATCO has no electricity metering facilities – Horizon Power meters at their substation but the output is not purchased by electrical energy but by time operated, so Metering Code items have been audited in this context. Accordingly the following items have been excluded: 339. As a generator the Metering Code obligations are as a general user and are no different to that of a load. However as loads are not licensed, Metering Code obligations are not visible to them and like generators metering requirements will be part of the access contract. But as obligations of the generation licence they have been considered in the audit.

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 Karratha licensed area was visited.

2.7.1 CORRECTIVE ACTIONS FROM LAST AUDIT

This is the first audit so there are no previous items to pursue.

2.8 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
 - The licensee's key people are
 - Dean Rodgers, Station Manager,
 - Gordon Owili, Manager Commercial & Risk, ATCO Australia
- McGill Engineering Services Pty Ltd
 - Kevan McGill, John McLoughlin

The audit was conducted during November and December 2011. Kevan McGill and John McLoughlin took about 80 (65/15) hours on the audit.

2.9 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 J McLoughlin	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

2.10 LICENCE

The Licensee was established by the owners to operate and maintain the licensed plant. The Licensee does not have the brief, capacity or resources to carry out the strategic asset management roles (this will be covered in the review) or any strategic decisions for customers.

2.11 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licence conditions. There were 3 non-complying items.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the for Generation Licence EGL 21 for the audit period based on the relevant clauses referred to within the scope section of this report.

2.12 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 17

The following are the risks determined for audit elements.

Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule) G/D/T/R	Obligations under condition	Consequences (1=Minor, 2=Moderate, 3=Major) Likelihood (A=likely, B=Probable, C=Unlikely)	Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	G = Generation	Type	Review priority	Rating							
									1	2	3	4	5	N ^a	N ^r	
Licence Conditions – Licence Clause – Obligations- Electricity Industry Act Section									1	2	3	4	5	N ^a	N ^r	
101.	14.1	s13(1)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>		
102.	20.1	s14(1)(a)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>		
103	20.2 & 20.3	s14(1)(b)	2	B	Medium	M	G	2	4		<input checked="" type="checkbox"/>					
104	20.4	s14(1)(c)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>		
105.	4.1	s17(1)	2	B	Medium	M	G	2	4		<input checked="" type="checkbox"/>					
106	5.1	s31(3)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>		
107.	5.1	s41(6)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
Licence Conditions – Electricity Industry Act Section									1	2	3	4	5	N ^a	N ^r	
Obligations- Licence Clause									1	2	3	4	5	N ^a	N ^r	
119.	s11	12.1	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
121.	s11	14.2	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
122.	s11	20.5	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
123.	s11	15.1	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
124.	s11	16.1	2	C	Medium	M	G	2	4			<input checked="" type="checkbox"/>				
125.	s11	17.1&17.2	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
126.	s11	18.1	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
Licence Conditions – Licence clause									1	2	3	4	5	N ^a	N ^r	
Obligations- Electricity Industry Metering Code Clause									1	2	3	4	5	N ^a	N ^r	
349	5.1	3.11(3)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
361	5.1	3.16(5)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
372	5.1	3.27	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
379	5.1.	4.4(1)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
380	5.1	4.5(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
381	5.1	4.5(1)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
393	5.1	5.4(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
406	5.1	5.16	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
407	5.1	5.17(1)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
408	5.1	5.18	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
409	5.1	5.19(1)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
410	5.1	5.19(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
411	5.1	5.19(3)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
412	5.1	5.19(4)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
414	5.1	5.19(6)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
420	5.1	5.21(5)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
421	5.1	5.21(6)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
439	5.1	5.27	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
446	5.1	6.1(2)	2	C	Medium	M	G	2	4						<input checked="" type="checkbox"/>	
448	5.1	7.2(1)	1	C	Low	M	G	NR	5				<input checked="" type="checkbox"/>			
450	5.1	7.2(4)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>

Item	Licence Clause/Condition reference (Cl.=clause, Sch.=schedule) G/D/T/R	Obligations under condition	Consequences (1=Minor, 2=Moderate, 3=Major) Likelihood (A=likely, B=Probable, C=Unlikely)	Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak)	G = Generation	Type	Review priority	Rating							
									1	2	3	4	5	N ^a	N ^r	
Licence Conditions – Licence clause																
Obligations- Electricity Industry Metering Code Clause																
451	5.1	7.2(5)	2	C	Medium	M	G	2	4		<input checked="" type="checkbox"/>					
452	5.1	7.5	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
453	5.1	7.6(1)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
454	5.1	8.1(1)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
455	5.1	8.1(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
456	5.1	8.1(3)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
457	5.1	8.1(4)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
458	5.1	8.3(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>

2.13 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.

2.13.1 AUDIT RESULTS AND RECOMMENDATIONS

Summary of significant results

There are 3 non-compliances.

2.13.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

The actions requiring corrective measures are:

Item	Issue	Recommended Action
451	There has been a change to the head office contact details which was not advised within 3 days. The operational communications address had not changed and the network operator was not affected.	Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.

Item 103 was also not compliant but the action is already completed.

Item	Issue	Recommended Action
105	The fees have been paid but not all on time.	Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.

2.13.3 SUGGESTIONS FOR IMPROVEMENT

There is a suggestion for improvement.

Item	Issue	Recommended Action
124	The Licensee has met the reporting manual requirements but the 2011 report while late was outside the audit period.	Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.

2.13.4 POST AUDIT IMPLEMENTATION PLAN

The Licensee will provide a separate post audit plan.

2.14 DETAILED FINDINGS

2.14.1 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 licence and licensed areas; and
- Identify the information systems and processes employed to manage licence and licensed areas
- Determine the level of understanding of the systems and processes for managing licence and licensed areas

In reviewing the procedures and protocols for managing provision of services within a licensed area, where applicable, we obtained details of the processes and assessed the reasonableness of the decision matrix and the adequacy of the control points implemented by the Licensee.

2.15 AUDIT EVIDENCE

The following was considered in the audit.

- Generation Licence
- Licence fee invoice /receipts
- ERA annual returns
- Outage information
- Risk planning information
- Directors approval of Annual reports notes
- Asset management information
- Financial data sighted
- MEX V12

2.16 DETAILED AUDIT FINDINGS

The following sets out the audit findings

2.16.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 101 Generation Licence 14.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must, not less than once every 24 months, 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 Station Manager, Commercial & Risk Manager. 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.	
Issues	
None	
Recommendations	
None	

Item 102 Generation Licence 20.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 14(1)(a)</i> A Licensee must provide for an asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: viewed operating manuals.	
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 asset management system. The operating and maintenance systems reviewed at the site. These included maintenance planning modules in MEX (Asset Management Maintenance IT system). The asset management system includes time based and conditioned based maintenance. The review examined the efficacy of the asset management system.	
Issues	
None	
Recommendations	
None	

Item 103 Generation Licence 20.2 &20.3	Compliance rating Not Compliant 2
Licence: <i>Generation</i>	

<i>Electricity Industry Act section 14(1)(b)</i> A licensee must notify details of the asset management system and any substantial changes to it to the Authority.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: viewed operating manuals.									
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 asset management system. The Licensee was late with the original advice to the Authority of its asset management system. It subsequently submitted an AMS to the Authority. There has been no significant change since.									
Issues									
Late submission in 2009 of AMS									
Recommendations									
None – The issue has been addressed, as the Authority has been advised of the AMS.									

Item 104 Generation Licence 20.4								Compliance rating Compliant 5	
Licence: Generation									
<i>Electricity Industry Act section 14(1)(c)</i> A licensee must provide the Authority with a report by an independent expert as to the effectiveness of its asset management system every 24 months, or such longer period as determined by the Authority.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents viewed operating manuals.									
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 attached review satisfies the requirement.									
Issues									
None									
Recommendations									
None									

Item 105 Generation Licence condition 4.1								Compliance rating Not Compliant 2	
Licence: Generation									
<i>Electricity Industry Act section 17(1)</i> A Licensee must pay to the Authority the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. 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"/>
The fees have been paid but not all (two) on time.									
Issues									
Late payment of fees									

Recommendations
Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.

Item 106	, Generation Licence 5.1	Compliance rating Compliant 5							
Licence: <i>Generation</i>									
<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 checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: Include incident log.									
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"/>
Interruptions are logged. There have been two plant failures but in all cases the interruption was minimised.									
Issues									
None									
Recommendations									
None									

Item 107	Generation Licence 5.1	Compliance rating Compliant 5							
Licence: <i>Generation</i>									
<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 checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: Lease document 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 land is leased and lease payments have been made.									
Issues									
None									
Recommendations									
None									

2.16.2 ELECTRICITY LICENCE – LICENCE CONDITIONS AND OBLIGATIONS

Item 119	Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>		
<i>Generation Licence condition 12.1</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 Station Manager, Commercial & Risk Manager. 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 Company Director's approval of annual reports show compliance with accounting standards.									
Issues									
None									
Recommendations									
None									

Item 121								Compliance rating	
Electricity Industry Act section 11								Compliant 5	
Licence: <i>Generation</i>									
<i>Generation Licence condition 14.2</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 Station Manager, Commercial & Risk Manager. 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 122								Compliance rating	
Electricity Industry Act section 11								Compliant 5	
Licence: <i>Generation</i>									
<i>Generation Licence condition 20.5</i>									
A Licensee must comply, and must require the Licensee's expert to comply, with the relevant aspects of the <i>Authority's</i> standard guidelines dealing with the asset management system.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: The AMS review plan has been forwarded to the <i>Authority</i> as part of approval of the reviewer.									
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 reviewer to comply with the requirements.									
Issues									
None									
Recommendations									
None									

Item 123								Compliance rating	
Electricity Industry Act section 11								Not Rated	
Licence: <i>Generation</i>									
<i>Generation Licence condition 15.1</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 Commercial Manager. 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 and has not been under external administration and therefore not able to assess compliance with advice requirements.									
Issues									
None									
Recommendations									
None									

Item 124							Compliance rating		
Electricity Industry Act section 11							Compliant 3		
Licence: <i>Generation</i>									
<i>Generation Licence condition 16.1</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 Station Manager, Commercial & Risk Manager. The Station Manager, advised that there have been no requests for information from the <i>Authority</i> other than Performance Audit. 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 but the 2011 report while late was outside the audit period.									
Issues									
Not all reports were on time.									
Recommendations									
Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.									

Item 125							Compliance rating		
Electricity Industry Act section 11							Not Rated		
Licence: <i>Generation</i>									
<i>Generation Licence condition 17.1 & 17.2</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 Station Manager, Commercial & Risk Manager. 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 126 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 18.1</i> Unless otherwise specified, all notices must be in writing.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Station Manager, Commercial & Risk Manager. 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	

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

Item 349 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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 Station Manager, Commercial & Risk Manager. Documents: Outage log.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
The output is not sold by electrical energy but by time operated so meters are not required or used. There are no meters on the Licensee's premises but Horizon Power has some meters on its substation. The Licensee has not been aware of any outage to notify the network operator.	
Issues	
None	
Recommendations	
None	

Item 361 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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 Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no non interval meters to model 3.16(4) and no request.									
Issues									
None									
Recommendations									
None									

Item 372							Compliance rating		
Licence condition 5.1							Not Rated		
Licence: <i>Generation</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 type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: n/a.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No new meters have been installed in the audit period - there are no meters.									
Issues									
None									
Recommendations									
None									

Item 379							Compliance rating		
Licence condition 5.1							Not Rated		
Licence: <i>Generation</i>									
<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 type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: n/a.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no meters and therefore have been no discrepancies.									
Issues									
None									
Recommendations									
None									

Item 380							Compliance rating		
Licence condition 5.1							Not Rated		
Licence: <i>Generation</i>									
<i>Electricity Industry Metering Code clause 4.5(1)</i>									
A Code participant must not knowingly permit the registry to be materially inaccurate.									

Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Station Manager, Commercial & Risk Manager. Documents: n/a.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee is no aware of any registry inaccuracies (it has no visibility of Horizon Power's registry other than its own details).									
Issues									
None									
Recommendations									
None									

Item 381 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a.									
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.									
Issues									
None									
Recommendations									
None									

Item 393 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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 (Licensee).									
Issues									
None									
Recommendations									
None									

Item 395 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No data has been provided (and therefore no charge made).									
Issues									
None									
Recommendations									
None									

Item 406 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The licensee does not collect or receive energy data to send to network operator (the Licensee has no meters to collect data from).									
Issues									
None									
Recommendations									
None									

Item 407 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The licensee does not provide standing data and validated (and where necessary substituted or estimated) energy data (the Licensee has no meters to collect data for).									
Issues									
None									
Recommendations									
None									

Item 408 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a	
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 has occurred in the audit period. There are no meters to change energisation status.	
Issues	
None	
Recommendations	
None	

Item 409 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a.	
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 410 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a	

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The licensee has one connection point with Horizon Power. (There is one substantial customer in Horizon and has no capacity to collect information on the customer's connections.)									
Issues									
None									
Recommendations									
None									

Item 411 Licence condition 5.1	Compliance rating Not Rated								
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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.									
Issues									
None									
Recommendations									
None									

Item 412 Licence condition 5.1	Compliance rating Not Rated								
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The Licensee is not aware of any sensitive loads.									
Issues									
None									
Recommendations									
None									

Item 414 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There were no changes in attributes in the audit period and no user advice.									
Issues									
None									
Recommendations									
None									

Item 420 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: Station Manager, Commercial & Risk Manager. Documents: n/a.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There were no requests in the audit period – there are no meters to test.									
Issues									
None									
Recommendations									
None									

Item 421 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Station Manager, Commercial & Risk Manager. Documents: n/a									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There were no requests in the audit period and therefore none inconsistent with the access agreement.									
Issues									
None									
Recommendations									
None									

Item 430 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a.									
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 446								Compliance rating	
Licence condition 5.1								Not Applicable	
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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 is no evidence of the Licensee not complying with the agreements. However the network is not a covered network and is not under the Access Code where an access contract is defined. The Licensee has an supply contract and not an access contract hence the item is not applicable.									
Issues									
None									
Recommendations									
None									

Item 448								Compliance rating	
Licence condition 5.1								Compliant 5	
Licence: <i>Generation</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 Station Manager, Commercial & Risk Manager. Documents: n/a.									
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 can send and receive communications by all required means. The Metering Code applies as clause 1.2 of the Metering Code defines code participants as generators by a licence condition, even if an access contract does not apply and they have no meters (all meters are owned by network operator in Code) or in this case even if the energy is not metered.									
Issues									
None									

Recommendations
None

Item 450 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</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	
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 451 Licence condition 5.1	Compliance rating Not Compliant 2
Licence: <i>Generation</i>	
<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 Station Manager, Commercial & Risk Manager. Documents: n/a	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been a change to the head office contact details which was not advised within 3 days. The operational communications address had not changed and the network operator was not affected. The Metering Code applies as clause 1.2 of the Metering Code defines code participants as generators by a licence condition even if an access contract does not apply.	
Issues	
Regulatory requirements need to be observed.	
Recommendations	
Establish a time related process in the maintenance IT system (MEX) to manage all regulatory obligations.	

Item 452 Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<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 Station Manager, Commercial & Risk Manager. Documents: n/a.									
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. There is no evidence of complaints about disclosure of confidential information. The Metering Code applies as clause 1.2 of the Metering Code defines code participants as generators by a licence condition even if an access contract does not apply.									
Issues									
None									
Recommendations									
None									

Item 453 Licence condition 5.1	Compliance rating Not Rated								
Licence: <i>Generation</i>									
<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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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.									
Issues									
None									
Recommendations									
None									

Item 454 Licence condition 5.1	Compliance rating Not Rated								
Licence: <i>Generation</i>									
<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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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 455 Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation</i>	
<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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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 456 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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 457 Licence condition 5.1							Compliance rating Not Rated		
Licence: <i>Generation</i>									
<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 Station Manager, Commercial & Risk Manager. Documents: n/a									
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									

