



# McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

## NewGen Power Kwinana Pty Ltd Electricity Generation Licence EGL 3 Performance Audit

**Prepared By Kevan McGill  
Date 22 February 2012**

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## McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Simon Ganley  
Plant Manager  
Manager NewGen Kwinana Pty Ltd  
Leath Road  
Kwinana WA

Dear Mr Ganley

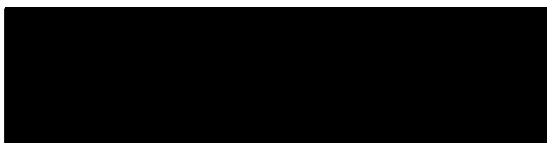
### **Performance Audit Electricity Licence**

The fieldwork on the performance audit of Generation Licence EGL 3 for the audit period (1 August 2009 to 31 July 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-complying item noted.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence EGL 3 for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely



Kevan McGill  
Director

Date 22 February 2012

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## 1 Executive Summary

NewGen Power Kwinana Pty Ltd (NGK) holds Generation Licence EGL 3 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 (1 August 2009 to 31 July 2011) to assess the Licensee's level of compliance with the licence conditions.

NGK operates a generation system in Kwinana. There is one principal client (Synergy).

The records and areas covered by the Licence were inspected and interviews were also held with key personnel at the operational site (Kwinana). The extent of the Licensee's assets has not changed since the last audit.

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 second audit of the licence held by NGK.

### 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 were no non compliances noted.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence EGL 3 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. All of the Licensee's obligations assessed in this audit, have an Audit Priority rating of 3, 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	13	0	0	1	7	5
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	0	0	0	0	0	0
Not Rated	30	0	0	0	20	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.

## 2 PERFORMANCE AUDIT

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### 2.1 PERFORMANCE AUDIT OBJECTIVES

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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)<sup>1</sup>.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Electricity Generating 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 3 for the Licensee.

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<sup>1</sup> Electricity compliance reporting manual, May 2011

## 2.2 AUDIT PERIOD

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The audit period is 1 August 2009 to 31 July 2011. The previous audit period was 22 February 2006 to 31 July 2009.

## 2.3 STATEMENT OF INDEPENDENCE

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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

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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

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

## 2.6 LICENCE FOR REVIEW PERIOD

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The audit/review period for the licence is from 1/8/09 to 31/7/11. During this period for each licence, two versions of the Licence were in-force at different times.

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)

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 has based the licence audit plans on V3 of the Licence and the licence obligations listed in the 2011 Electricity Compliance Reporting Manual.

## 2.7 INHERENT LIMITATIONS

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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.

## 2.8 SCOPE OF THE AUDIT

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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 Kwinana licensed area was visited.

The actions to follow up previous audits are detailed in the following sections.

**2.8.1 CORRECTIVE ACTIONS FROM LAST AUDIT**

**Corrective actions from last audit:**

Recommendations from last review	Actions Taken	Resolution	Further Recommendations
Fees should be paid to the <i>Authority</i> on time and processes should be put into place to ensure payment before the anniversary of the issue of the licence. Steve Farley, Station Manager, NewGen Power Kwinana, should be responsible to do this by 1 January 2010.	Included in work plans with reminders in MEX. Maintenance Experts Database (MEX). Asset management system maintenance system.	Completed	None
Reports should be submitted to the <i>Authority</i> on time	Included in work plans with	Completed	None

<p>and processes should be put into place to ensure reporting by the prescribed time. Steve Farley, Station Manager, NewGen Power Kwinana, should be responsible to do this by 1 January 2010.</p>	<p>reminders in MEX</p>		
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## 2.9 AUDIT ROLES

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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
  - Simon Ganley, Plant Manager,
  - Phillip MacMahon, Operations Manager, ERM Power
  - Vern Louw, Financial Controller, ERM Power
- McGill Engineering Services Pty Ltd
  - Kevan McGill, John McLoughlin

The audit was conducted during September and October 2011. Kevan McGill and John McLoughlin took about 100 (80/20) hours on the audit.

## 2.10 AUDIT REQUIREMENTS

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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"> <li>• The control environment</li> <li>• Information system</li> <li>• Compliance procedures</li> <li>• Compliance attitude</li> </ul>	K McGill J McLoughlin	AUS 502: Audit Evidence AUS 806: Performance Auditing
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

## 2.11 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.

## 2.12 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licence conditions. There were no non-complying items.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the for Generation Licence EGL 3 for the audit period based on the relevant clauses referred to within the scope section of this report.

## 2.13 FINDINGS

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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		Inherent Risk	Adequacy of Existing Controls (S=Strong, M=Moderate, W=Weak) G = Generation	Type	Review priority	Rating							
			(A=likely, B=Probable, C=Unlikely)						1	2	3	4	5	N <sup>a</sup>	N <sup>i</sup>	
Licence Conditions – Licence Clause – Obligations- Electricity Industry Act Section									1	2	3	4	5	N <sup>a</sup>	N <sup>i</sup>	
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	S11	2	B	Medium	M	G	2	5					<input checked="" type="checkbox"/>		
104.	20.4	S11	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 <sup>a</sup>	N <sup>i</sup>	
Obligations- Licence Clause																
119.	s11	12.1	2	B	Medium	W	G	2	3					<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 (2010 manual – 2008 manual) – Licence clause									1	2	3	4	5	N <sup>a</sup>	N <sup>i</sup>	
Obligations- Electricity Industry Metering Code Clause																
349 (319 <sup>2</sup> )	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 (342)	5.1	3.27	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
379 (349)	5.1	4.4(1)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
380 (350)	5.1	4.5(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
381 (351)	5.1	4.5(1)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
393 (363)	5.1	5.4(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
406 (376)	5.1	5.16	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
407 (377)	5.1	5.17(1)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
408 (378)	5.1	5.18	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
409 (379)	5.1	5.19(1)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
410 (380)	5.1	5.19(2)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
411 (381)	5.1	5.19(3)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
412 (382)	5.1	5.19(4)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
414 (384)	5.1	5.19(6)	1	C	Low	M	G	NR	5							<input checked="" type="checkbox"/>
420 (390)	5.1	5.21(5)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
421 (391)	5.1	5.21(6)	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>
439 (409)	5.1	5.27	2	C	Medium	M	G	2	4							<input checked="" type="checkbox"/>

<sup>2</sup> Numbers in brackets are numbers from last audit (previous compliance manual)

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 <sup>a</sup>	N <sup>i</sup>			
Licence Conditions (2010 manual – 2008 manual) – Licence clause																	
Obligations- Electricity Industry Metering Code Clause																	
446 (416)	5.1	6.1(2)	2 C	Medium	M	G	2 4										<input checked="" type="checkbox"/>
448 (418)	5.1	7.2(1)	1 C	Low	M	G	NR 5						<input checked="" type="checkbox"/>				<input checked="" type="checkbox"/>
450 (420)	5.1	7.2(4)	2 C	Medium	M	G	2 4										<input checked="" type="checkbox"/>
451 (421)	5.1	7.2(5)	2 C	Medium	M	G	2 4										<input checked="" type="checkbox"/>
452 (422)	5.1	7.5	2 C	Medium	M	G	2 4						<input checked="" type="checkbox"/>				
453 (423)	5.1	7.6(1)	2 C	Medium	M	G	2 4										<input checked="" type="checkbox"/>
454 (424)	5.1	8.1(1)	1 C	Low	M	G	NR 5										<input checked="" type="checkbox"/>
455 (425)	5.1	8.1(2)	1 C	Low	M	G	NR 5										<input checked="" type="checkbox"/>
456 (426)	5.1	8.1(3)	1 C	Low	M	G	NR 5										<input checked="" type="checkbox"/>
457 (427)	5.1	8.1(4)	2 C	Medium	M	G	2 4										<input checked="" type="checkbox"/>
458 (428)	5.1	8.3(2)	1 C	Low	M	G	NR 5										<input checked="" type="checkbox"/>

## 2.14 ESTABLISHING THE CONTEXT

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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

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#### Summary of significant results

There are no non compliances.

### 2.14.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

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There are no actions requiring corrective measures.

### 2.14.3 SUGGESTIONS FOR IMPROVEMENT

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There are no suggestions for improvement.

### 2.14.4 POST AUDIT IMPLEMENTATION PLAN

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There are no items to follow up and therefore there is no need for a separate post audit plan.

## 2.15 DETAILED FINDINGS

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### 2.15.1 AUDIT WORK UNDERTAKEN

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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.

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## 2.16 AUDIT EVIDENCE

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The following was considered in the audit.

- Generation Licence
- Past audit
- Licence fee invoice /receipts
- ERA annual returns
- Outage log
- Outage information
- Risk planning information
- Ocean outfall monitoring data
- Annual reports
- Financial data sighted

2.17 DETAILED AUDIT FINDINGS

The following sets out the audit findings

2.17.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

<b>Item 101</b> Generation Licence 14.1	Compliance rating Compliant 5
<b>Licence:</b> <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> .	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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. The last audit was also conducted to requirements.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 102</b> Generation Licence 20.1	Compliance rating Compliant 5
<b>Licence:</b> <i>Generation</i>	
<i>Electricity Industry Act section 14(1)(a)</i> A Licensee must provide for an asset management system.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. Documents: Include, metering drawings, meter calibrations, 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 Maintenance Experts Database (MEX). The operating and maintenance systems reviewed at the sites. These included maintenance planning modules in MEX. The asset management system includes time based and conditioned based maintenance. The review examined the efficacy of the asset management system.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 103</b> Generation Licence 20.2 & 20.3	Compliance rating Compliant 5
<b>Licence:</b> <i>Generation</i>	

<b>Electricity Industry Act section 14.1(b)</b>	
A licensee must notify details of the asset management system and any substantial changes to it to the Authority.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. Documents: Licence application, last audit.	
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 advised the Authority as discussed in last audit. There have been no substantial changes since.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 104</b>	Compliance rating
Generation Licence 20.4	Compliant 5
<b>Licence:</b> Generation	
<b>Electricity Industry Act section 14(1)(c)</b>	
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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. Documents: Last Audit/review	
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/reviewer to carry out the review to meet the requirements. The last review was also conducted to requirements. The review covers the efficacy of the Asset Management System	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 105</b>	Compliance rating
Generation Licence condition 4.1	Compliant 5
<b>Licence:</b> Generation	
<b>Electricity Industry Act section 17(1)</b>	
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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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 and on time.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 106</b>	Generation Licence 5.1	Compliance rating Compliant 5
<b>Licence:</b> Generation		
<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.		
<b>Observations</b>		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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. In all cases the interruption was minimised.		
<b>Issues</b>		
None		
<b>Recommendations</b>		
None		

<b>Item 107</b>	Generation Licence 5.1	Compliance rating Not Rated
<b>Licence:</b> Generation		
<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.		
<b>Observations</b>		
Documents	<input type="checkbox"/>	Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. 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. All assets are on mining leases and no payments have been made for interests or easements in land.		
<b>Issues</b>		
None		
<b>Recommendations</b>		
None		

2.17.2 ELECTRICITY LICENCE – LICENCE CONDITIONS AND OBLIGATIONS

<b>Item 119</b>	Electricity Industry Act section 11	Compliance rating Compliant 5
<b>Licence:</b> Generation		
<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.		
<b>Observations</b>		
Documents	<input checked="" type="checkbox"/>	Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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 annual report shows compliance with accounting standards except that as a non reporting body, reporting requirements are not applicable.		

<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 121</b> Electricity Industry Act section 11	Compliance rating Compliant 5
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. Documents: The audit plan was forwarded to the <i>Authority</i> , approval of the auditor obtained prior to appointment. Last audit 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 contracted with the auditor to comply with the requirements. Last audit also complied.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 122</b> Electricity Industry Act section 11	Compliance rating Compliant 5
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. Documents: The AMS review plan has been forwarded to the <i>Authority</i> as part of approval of the reviewer. Last Review 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 contracted with the reviewer to comply with the requirements. Last review also complied.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 123</b> Electricity Industry Act section 11	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	

Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
<b>Evidence:</b> 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.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 124</b> Electricity Industry Act section 11	Compliance rating Compliant 5		
<b>Licence:</b> <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.			
<b>Observations</b>			
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>
<b>Evidence:</b> interviewed Plant Manager. The Plant Manager advised that there have been no requests for information from the <i>Authority</i> other than Performance Audit, AMS Review and 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.			
<b>Issues</b>			
None.			
<b>Recommendations</b>			
None.			

<b>Item 125</b> Electricity Industry Act section 11	Compliance rating Not Rated		
<b>Licence:</b> <i>Generation</i>			
<i>Generation Licence condition 17.1 &amp; 17.2</i> A Licensee must publish any information it is directed by the <i>Authority</i> to publish, within the timeframes specified.			
<b>Observations</b>			
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.			
<b>Issues</b>			
None			
<b>Recommendations</b>			
None			

<b>Item 126</b> Electricity Industry Act section 11	Compliance rating Compliant 5
<b>Licence:</b> <i>Generation</i>	
<i>Generation Licence condition 18.1</i> Unless otherwise specified, all notices must be in writing.	

<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

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

<b>Item 349 (319)</b>							Compliance rating		
Licence condition 5.1							Not Rated		
<b>Licence:</b> <i>Generation Retail</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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Plant Manager. Documents: Outage log.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There has been no outage to notify the network operator.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 361 ()</b>							Compliance rating		
Licence condition 5.1							Not Rated		
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 372 (342)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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 – the meters are Western Power's).	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 379 (349)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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 discrepancies.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 380 (350)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> Plant 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 Western Power's registry other than its own details).	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	



<b>Item 381 (351)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 393 (363)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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).	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 395 ()</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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).	
<b>Issues</b>	
None	

<b>Recommendations</b>
None

<b>Item 406 (376)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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).	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 407 (377)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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 from).	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 408 (378)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	

<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 409 (379)</b> Licence condition 5.1							Compliance rating Not Rated		
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									
<b>Management Actions</b>									
Not applicable									

<b>Item 410 (380)</b> Licence condition 5.1							Compliance rating Not Rated		
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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 have any customers.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 411 (381)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 412 (382)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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 sensitive load exists.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 414 (384)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 420 (390)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 421 (391)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 430 (409)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	

<b>Issues</b>
None
<b>Recommendations</b>
None

<b>Item 446 (416)</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance
<b>Evidence:</b> interviewed Plant Manager. Documents: n/a	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
There is no evidence of the Licensee not complying with the agreements.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 448 (418)</b> Licence condition 5.1	Compliance rating Compliant 5
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input checked="" type="checkbox"/> Compliance
<b>Evidence:</b> interviewed Plant Manager. Documents: n/a.	
Process	<input checked="" type="checkbox"/> Outcome
Output	<input checked="" type="checkbox"/> Reporting
Compliance	<input checked="" type="checkbox"/>
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 450 (420)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance
<b>Evidence:</b> 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 451 (421)</b> Licence condition 5.1	Compliance rating Not Rated								
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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 changes of contact details.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 452 (422)</b> Licence condition 5.1	Compliance rating Compliant 5								
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 453 (423)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <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.	

<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 454 (424)</b> Licence condition 5.1	Compliance rating Not Rated								
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 455 (425)</b> Licence condition 5.1	Compliance rating Not Rated								
<b>Licence:</b> <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.									
<b>Observations</b>									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
<b>Evidence:</b> interviewed Plant 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.									
<b>Issues</b>									
None									
<b>Recommendations</b>									
None									

<b>Item 456 (426)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> <i>Generation</i>	



<b>Electricity Industry Metering Code clause 8.1(3)</b>	
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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 457 (427)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> Generation	
<b>Electricity Industry Metering Code clause 8.1(4)</b>	
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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

<b>Item 458 (428)</b> Licence condition 5.1	Compliance rating Not Rated
<b>Licence:</b> Generation	
<b>Electricity Industry Metering Code clause 8.3(2)</b>	
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.	
<b>Observations</b>	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
<b>Evidence:</b> interviewed Plant 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.	
<b>Issues</b>	
None	
<b>Recommendations</b>	
None	

