



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Goldfields Power Pty Ltd

**Electricity Retail Licence ERL 4,
Electricity Generation Licence EGL 11
Performance Audit**

**Prepared By Kevan McGill
Date 15 March 2012**



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Aron Willis
General Manger
TransAlta Energy Australia Pty Ltd
(Manager of Goldfields Power Pty Ltd)
L 14 191 St George Terrace
PERTH WA 6000

Dear Mr Willis

Performance Audit Electricity Licences

The fieldwork on the performance audit of Generation Licence EGL 11 and Retail Licence ERL 4, for the audit period (1/7/08 to 30/6/11) 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 licences conditions and integrity with the Licensee's reporting obligations. While there was a non complying item noted this was not a significant item.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence EGL 11 and Retail Licence ERL 4 for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 15 Mach 2012

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1 Executive Summary

Goldfields Power Pty Ltd (GPPL) holds Generation Licence EGL 11 and Retail Licence ERL 4 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 July 2008 to 30 June 2011) to assess the Licensee's level of compliance with the licence conditions.

GPPL operates a generation system in Kalgoorlie (Parkeston) and retails that generation. There is one principal customer.

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

The Electricity Licences require 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 licences held by GPPL.

1.1 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licences conditions and integrity with the Licensee's reporting obligations. While there was a non compliance noted this was not a significant item.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Generation Licence EGL 11 and Retail Licence ERL 4 for the audit period based on the relevant clauses referred to within the objectives section (Page 7) of this report.

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

1.2 RATINGS

A risk assessment approach is used to develop the depth of audit required for each Obligation and is documented in an Audit Plan approved by the *Authority* prior to audit. A 5 level Audit Priority scale is used based on the combined rating for Inherent Risk and Control Adequacy defined in the following table. Following approval of the audit plan, a number of obligations were approved by the *Authority* for removal from the audit. The Licensee's obligations assessed in this audit, all 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	19	0	0	0	11	9
Compliant 4	0	0	0	0	0	0
Compliant 3	0	0	0	0	0	0
Non-compliant 2	1	0	0	0	1	0
Significantly Non-compliant 1	0	0	0	0	0	0
Not Applicable	0	0	0	0	0	0
Not Rated	26	0	0	1	18	7

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

2 PERFORMANCE AUDIT

2.1 PERFORMANCE AUDIT OBJECTIVES

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

The primary objective of the audit is to audit the effectiveness of measures taken by the Licensee to maintain quality and performance standards. The Act states a performance audit is an audit of the effectiveness of measures taken by the Licensee to meet the performance criteria specified in the licences. The licences state 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 licences also provide for individual licence conditions namely - the *Authority* may prescribe individual performance standards in relation to the Licensee of its obligations under this licence or the applicable legislation (the Act and subordinate legislation).

The *Authority* has summarised the performance requirements in various legislation in its Electricity compliance reporting manual (July 2010)¹.

The Licensee appointed McGill Engineering Services Pty Ltd to conduct the audit of its Generation and Retail Licences 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 Distribution and Retail Licences through a combination of enquiries, examination of documents and detailed testing for Generation Licence EGL 11 and Retail Licence ERL 4 for the Licensee.

¹ Electricity compliance reporting manual, July 2010

2.2 AUDIT PERIOD

The audit period is 1 July 2008 to 30 June 2011. The previous audit period was 1 June 2006 to 30 June 2008.

2.3 STATEMENT OF INDEPENDENCE

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

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

There are no independence threats due to:

- self-interest – as the audit company or a member of the audit team have no financial or non-financial interests in the Licensee or a related entity;
- self-review – no circumstance has occurred where:
 - the audit company or a member of the audit team has undertaken other non-audit work for the Licensee that is being evaluated in relation to the audit/review; or
 - when a member of the audit team was previously an officer or director of the Licensee; or
 - where a member of the audit team was previously an employee of the Licensee who was in a position to exert direct influence over material that will be subject to audit during an audit/review.

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

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

2.4 SCOPE LIMITATION

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

2.4.1 EXCLUDED CONDITIONS

Licence conditions applying to small use consumers have been excluded as the licensee has no small use consumers, accordingly conditions 88-89, 94; 97-102, have been excluded from the audit. Conditions relating to the Electricity Corporations are not applicable (78-80, 90-92, 350 (333 in previous manual),). Condition relevant to the market rules are not applicable 348 (331). Conditions relating to covered networks are not relevant (95). Conditions relating to the Code of Conduct for the Supply of Electricity to Small Use Consumers (113 to 316 (299) & 385-386 (368-369)) have been excluded as these apply to Small Use Consumers only. Conditions relating to Obligations to Connect Regulations (72-77) only apply to small use customers and therefore have been deleted from the audit. Conditions relating to being a supplier of last resort (93) have been deleted as the licensees' area has not been designated. As no individual performance standards have been applied, item 106 has been excluded.

The Customer Transfer Code defines its objectives as:

2.1 Objectives

(1) The objectives of this Code are to—

- (a) set out rules for the provision of information relating to contestable customers and the process for transferring contestable customers from one retailer to another retailer in order to promote retail competition;*

As there is only one retailer operating on the network, no retail transfer is possible and contestable customers are those with a choice of retailer and information provision is in the context of choice of retailer, the code is not applicable, therefore obligations 1-71 have been excluded from the review.

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

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

2.6 SCOPE OF THE AUDIT

The audit was conducted in 3 phases.

1. RISK AND MATERIALITY ASSESSMENT

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

2. SYSTEM ANALYSIS, ASSERTION SETTING AND REVIEW

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

3. FIELDWORK: TESTING AND ANALYSIS

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

During this audit the Perth office and Kalgoorlie licensed areas were visited.

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

2.6.1 CORRECTIVE ACTIONS FROM LAST AUDIT

Exemptions to be sought from the Office of Energy from the Transfer Code and Metering Code where they do not make business sense. Manager, Commercial & Business Development, Trans Alta Energy (Australia) Pty Ltd, Dan Cannon should be responsible to do this by June 2009.

No.	Condition	Issue/Corrective Action
54	A network operator or a retailer must send required electronic communications to the applicable electronic communication address, in accordance with Annex 6.	There is no business need for protocols for communication between retailer and distributor which are essentially vertically integrated. Communications with customers are established by contract. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
69	A network operator and a retailer must establish a mechanism to generate an automated response message for each electronic communication (other than an automated response message) received at the electronic communication address.	There is no business need for protocols for communication between retailer and distributor which are essentially vertically integrated. Communications with customers are established by contract. The Licensee should approach the Office of Energy to seek an exemption from this requirement.

Note that these actions arise from the Customer Transfer Code which has been excluded from the audit so there are no actions to follow up.

2.7 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
 - Aron Willis, General Manager;
 - Troy Forward, Commercial Manager;
 - Keith Adams Manager Northern and Southern Section.
 - Jamie Crombie, Assistant Manager Southern Section;
 - Mark Ellis, Assistant Manager Northern Section;
 - Howard Price, Assistant Manager Northern Section; and
- McGill Engineering Services Pty Ltd
 - Kevan McGill, John McLoughlin

The audit was conducted during July to August 2011. Kevan McGill and John McLoughlin took about 120 (100/20) hours on the audit.

2.8 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

2.9 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 on customers. The customers are supplied under Power Procurement Agreements (PPA) which pre-dates the Act and therefore the Licence and the audit period. Metering and supply conditions are covered by these PPAs.

2.10 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licences conditions while there was a non-complying item it was not a significant item.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the for Generation Licence EGL 11 and Retail Licence ERL 4 licences for the audit period based on the relevant clauses referred to within the scope section of this report.

2.11 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 16

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 R + Retail	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
81.	15.1/15.1	s ² 13(1)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>		
82.	16.1	s14(1)(a)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>		
83.	16.1 & 16.2	s14(1)(b)	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
84.	16.3	s14(1)(c)	1	C	Low	M	G	NR	5					<input checked="" type="checkbox"/>		
85.	4.1/4.1	s17(1)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>		
86.	5.1/5.1	s31(3)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>		
87.	5.1/5.1	s41(6)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
96	5.1	s115(2)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
Licence Conditions – Electricity Industry Act Section Obligations- Licence Clause										1	2	3	4	5	N ^a	N ^r
103.	s11	12.2	2	B	Medium	W	G	2	3							<input checked="" type="checkbox"/>
104.	s11	12.3	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
105.	s11	13.1/20.1	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>		
107.	s11	15.2/22.2	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>		
108.	s11	16.4	2	C	Medium	M	G	2	4					<input checked="" type="checkbox"/>		
109.	s11	17.1/23.1	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
110.	s11	18.1/24.1	2	C	Medium	M	G R	2	4		<input checked="" type="checkbox"/>					
111.	s11	19.2/25.2	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
112.	s11	20.1/26.1	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>		
Licence Conditions (2010 manual – 2008 manual) – Licence clause Obligations- Electricity Industry Metering Code Clause										1	2	3	4	5	N ^a	N ^r
326 (309 ³).	5.1	3.5(6)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
336 (319)	5.1	3.11(3)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
359 (342).	5.1	3.27	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
366 (349).	5.1.	4.4(1)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>		
367 (350).	5.1	4.5(2)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>		
368 (351).	5.1	4.5(1)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
380 (363).	5.1	5.4(2)	1	C	Low	M	G R	NR	5							<input checked="" type="checkbox"/>
393 (376).	5.1	5.16	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>		
394 (377).	5.1	5.17(1)	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>		
395 (378).	5.1	5.18	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
396 (379).	5.1	5.19(1)	1	C	Low	M	G R	NR	5							<input checked="" type="checkbox"/>
397 (380).	5.1	5.19(2)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>		
398 (381).	5.1	5.19(3)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
399 (382).	5.1	5.19(4)	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>

² s= Section of Act

³ Numbers in brackets are from last audit (previous manual)

Licence Conditions (2010 manual – 2008 manual) – Licence clause										1	2	3	4	5	N ^a	N ^r	
Obligations- Electricity Industry Metering Code Clause																	
401 (384)	5.1	5.19(6)	1	C	Low	M	G R	NR	5								<input checked="" type="checkbox"/>
407 (390)	5.1	5.21(5)	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
408 (391)	5.1	5.21(6)	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
426 (409)	5.1	5.27	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
433 (416)	5.1	6.1(2)	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>			
435 (418)	5.1	7.2(1)	1	C	Low	M	G R	NR	5					<input checked="" type="checkbox"/>			
437 (420)	5.1	7.2(4)	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
438 (421)	5.1	7.2(5)	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
439 (422)	5.1	7.5	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>			
440 (423)	5.1	7.6(1)	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
441 (424)	5.1	8.1(1)	1	C	Low	M	G R	NR	5								<input checked="" type="checkbox"/>
442 (425)	5.1	8.1(2)	1	C	Low	M	G R	NR	5								<input checked="" type="checkbox"/>
443 (426)	5.1	8.1(3)	1	C	Low	M	G R	NR	5								<input checked="" type="checkbox"/>
444 (427)	5.1	8.1(4)	2	C	Medium	M	G R	2	4								<input checked="" type="checkbox"/>
445 (428)	5.1	8.3(2)	1	C	Low	M	G R	NR	5								<input checked="" type="checkbox"/>

2.12 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.

2.12.1 AUDIT RESULTS AND RECOMMENDATIONS

Summary of significant results

A non compliance has been recorded

2.12.2 COMPLIANCE ELEMENTS REQUIRING CORRECTIVE MEASURES

Item 110 Electricity Industry Act section 11	Compliance rating Not Compliant 2
Licence: <i>Distribution, Transmission, Generation, Retail</i>	
<i>Distribution Licence condition 21.1, Transmission Licence condition 18.1, Generation Licence condition 18.1, Retail Licence Condition 24.1</i>	
A Licensee must provide the <i>Authority</i> , in the manner prescribed, any information the <i>Authority</i> requires in connection with its functions under the Electricity Industry Act.	
The Licensee has met the reporting manual requirements except not all were on time.	
Issues	
Annual returns need to be on time.	
Recommendations	
Develop a compliance manual with all regulatory requirements and the corresponding time obligations.	

The Licensee should also consider seeking exemptions from the Office of Energy from the Metering Code where they do not make business sense, for example where the customers pre date the Codes and have bi-lateral power purchase agreements and are not in the public electricity supply business. The General Manager should be responsible to do this by June 2012.

2.12.3 SUGGESTIONS FOR IMPROVEMENT

There are no suggestions for improvement.

2.12.4 POST AUDIT IMPLEMENTATION PLAN

The Licensee will be providing a separate post audit plan.

2.13 DETAILED FINDINGS

2.13.1 AUDIT WORK UNDERTAKEN

Interviews and enquiries were conducted to:

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

2.14 AUDIT EVIDENCE

The following were considered in the audit.

- Generation Licence
- Retail Licence
- Past audit
- Contact details
- Licence fee invoice /receipts
- ERA annual returns
- Outage log
- Outage information
- Risk planning information
- Meter calibration report
- Change of address letters
- Meter database
- Power procurement agreement sample
- Meter drawings/documents
- GPMate V6

2.15 DETAILED AUDIT FINDINGS

The following sets out the audit findings

2.15.1 ELECTRICITY INDUSTRY ACT – LICENCE CONDITIONS AND OBLIGATIONS

Item 81 Generation Licence 15.1, Retail Licence condition 22.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</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
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: The Licensee contracted with the auditor to carry out the audit. The documents were forwarded to the <i>Authority</i> as part of the approval of the auditor. Licensee received approval from the <i>Authority</i> for audit scope and appointment of auditor.	
Process	<input checked="" type="checkbox"/> Outcome
<input checked="" type="checkbox"/> Output	<input checked="" type="checkbox"/> Reporting
<input checked="" type="checkbox"/> Compliance	<input checked="" type="checkbox"/>
The Licensee contracted with the auditor to carry out the audit to meet the requirements. The last audit was also conducted to requirements.	
Issues	
None	
Recommendations	
None	

Item 82 Generation Licence 16.1	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must provide for an asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. 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. The operating and maintenance systems reviewed at the sites. These included maintenance planning modules in GP Mate V6. 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 83	Compliance rating
Generation Licence 16.1 & 16.2	Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 13(1)</i> A Licensee must notify details of the asset management system and any substantial changes to it to the <i>Authority</i> .	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: The asset management system was examined in the 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"/>
Previous audits covered advice to the <i>Authority</i> of the asset management system. There have been no substantial changes that required notifying the <i>Authority</i>	
Issues	
None	
Recommendations	
None	

Item 84	Compliance rating
Generation Licence 16.3	Compliant 5
Licence: <i>Generation</i>	
<i>Electricity Industry Act section 14(1)(c)</i> A Licensee must provide the <i>Authority</i> 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 <i>Authority</i> .	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: Include Previous asset management review. Approval and Appointment letters for current 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 McGill Engineering Services, with approval of the <i>Authority</i> , for the review in accordance with the requirements and the review plan documents have been forwarded to the <i>Authority</i> as part of approval of the auditor. The review is being carried out within the time frame approved. The last review was also conducted to requirements.	
Issues	
None	
Recommendations	
None	

Item 85	Compliance rating
Generation Licence condition 4.1, Retail Licence condition 4.1	Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Act section 17(1)</i> A Licensee must pay to the <i>Authority</i> the prescribed licence fee within one month after the day of grant or renewal of the licence and within one month after each anniversary of that day during the term of the licence.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance
Evidence: interviewed Commercial 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 on time.
Issues
None
Recommendations
None

Item 86	, Generation Licence 5.1 Retail Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. 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 accordance with the PPAs. There are contractual penalties for interruptions outside the contracted requirements. In all cases the interruption was minimised.		
Issues		
None		
Recommendations		
None		

Item 87	Generation Licence 5.1, Retail Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation Retail</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 type="checkbox"/>	Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South. 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.		
Issues		
None		
Recommendations		
None		

Item 96	Generation Licence 5.1, Retail Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>		
<i>Electricity Industry Act section 115(2)</i> A Licensee that has, or is an associate of a person that has, access to services under an access agreement must not engage in conduct for the purpose of hindering or prohibiting access.		

Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South. Documents: Not applicable.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests for access to the network so there is no behaviour that could engage in conduct for the purpose of hindering or prohibiting access.									
Issues									
None									
Recommendations									
None									

2.15.2 ELECTRICITY LICENCES – LICENCE CONDITIONS AND OBLIGATIONS

Item 103	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.2</i>	
A Licensee must amend the asset management system before an expansion or reduction in generating works, distribution systems and transmission systems and notify the <i>Authority</i> in the manner prescribed, if the expansion or reduction is not provided for in the asset management system.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South. Documents: Include 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 expansion or reduction in the audit period.	
Issues	
None	
Recommendations	
None	

Item 104	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 12.3</i>	
A Licensee must not expand the generating works, distribution systems or transmission systems outside the licence area.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South. Documents: Not applicable.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
There has been no expansion or reduction let alone outside the licence area.	
Issues	
None	

Recommendations
None

Item 105 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Generation Licence condition 13.1, Retail Licence Condition 20.1</i> A Licensee and any related body corporate must maintain accounting records that comply with the Australian Accounting Standards Board Standards or equivalent International Accounting Standards.	
Observations	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
Evidence: interviewed Commercial 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 reporting requirements are not applicable.	
Issues	
None	
Recommendations	
None	

Item 107 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Generation Licence condition 15.2, Retail Licence Condition 22.2</i> A Licensee must comply, and require its auditor to comply, with the <i>Authority's</i> standard audit guidelines dealing with the performance audit.	
Observations	
Documents <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>	
Evidence: interviewed Commercial Manager, Manager North & South. 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.	
Issues	
None	
Recommendations	
None	

Item 108 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Generation</i>	
<i>Generation Licence condition 16.4</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 Commercial Manager, Manager North & South. 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.									
Issues									
None									
Recommendations									
None									

Item 109	Compliance rating								
Electricity Industry Act section 11	Not Rated								
Licence: <i>Generation, Retail</i>									
<i>Generation Licence condition 17.1, Retail Licence Condition 23.1</i>									
A Licensee must report to the <i>Authority</i> , in the manner prescribed, if a Licensee is under external administration or there is a significant change in the circumstances upon which the licence was granted which may affect a Licensee's ability to meet its obligations.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed 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 110	Compliance rating								
Electricity Industry Act section 11	Not Compliant 2								
Licence: <i>Generation, Retail</i>									
<i>Generation Licence condition 18.1, Retail Licence Condition 24.1</i>									
A Licensee must provide the <i>Authority</i> , in the manner prescribed, any information the <i>Authority</i> requires in connection with its functions under the Electricity Industry Act.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South. The Asset 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 except not all were on time.									
Issues									
Annual returns need to be on time.									
Recommendations									
Develop a compliance manual with all regulatory requirements and the corresponding time obligations.									

Item 111	Compliance rating
Electricity Industry Act section 11	Not Rated
Licence: <i>Generation, Retail</i>	
<i>Generation Licence condition 19.2, Retail Licence Condition 25.2</i>	
A Licensee must publish any information it is directed by the <i>Authority</i> to publish, within the timeframes specified.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Asset 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 112	Compliance rating
Electricity Industry Act section 11	Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Generation Licence condition 20.1, Retail Licence Condition 26.1</i>	
Unless otherwise specified, all notices must be in writing.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Asset 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	

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

Item 326 (309)	Compliance rating
Licence condition 5.1	Not Rated
Licence: <i>Generation Retail</i>	
<i>Electricity Industry Metering Code clause 3.5(6)</i>	
A network operator may only impose a charge for providing, installing, operating or maintaining a metering installation in accordance with the applicable service level agreement between it and the user.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter load information, PPAs	
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 installations in the audit period. There have been no charges for operating or maintaining a metering installation and this is in line with the service level agreement (PPAs) and communicated with customers.
Issues
None
Recommendations
None

Item 336 (319) Licence condition 5.1	Compliance rating Not Rated
Licence: <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.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter load information.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No advice has been received from customers. A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts.	
Issues	
None	
Recommendations	
None	

Item 359 (342) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 3.27</i> A person must not install a metering installation on a network unless the person is the network operator or a registered metering installation provider for the network operator doing the type of work authorised by its registration.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter load information.	
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.	
Issues	
None	
Recommendations	
None	

Item 366 (349) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</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 checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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 power purchase agreements set out discrepancy resolution issues. The meter data is held in the SCADA and the data held in the meter checked with the SCADA data monthly. No discrepancies have occurred and the metering data in the metering installation is not used other than for checking purposes. There have been communication issues between the SCADA and the metering data base where estimated data has been used. As the PPAs do not make a peak charge, energy data self corrects at the next reading after a communications break. The retailer and network operator are the same organisation so the only relevant Code participants are the customers who have PPAs.									
Issues									
None									
Recommendations									
None									

Item 367 (350)								Compliance rating	
Licence condition 5.1								Compliant 5	
Licence: <i>Generation, Retail</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 checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
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 meter database has been sighted and there are no known errors. The Generator, Retailer and network operator are the same organisation so there is no reason for advice to each other. There has been no advice from customers of registry inaccuracies. There have been no customer (Code participants) complaints.									
Issues									
None									
Recommendations									
None									

Item 368 (351)								Compliance rating	
Licence condition 5.1								Not Rated	
Licence: <i>Generation, Retail</i>									
<i>Electricity Industry Metering Code clause 4.5(2)</i>									
If a Code participant (other than a network operator) becomes aware of a change to or an inaccuracy in an item of standing data in the registry, then it must notify the network operator and provide details of the change or inaccuracy within the timeframes prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North									

and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases									
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. A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts. There are no alternative retailers for transfers to cause registry errors. There is no need for a process for notification as the Generator, Retailer are the same person.									
Issues									
None									
Recommendations									
None									

Item 380 (363) Licence condition 5.1								Compliance rating Not Rated	
Licence: <i>Generation, Retail</i>									
<i>Electricity Industry Metering Code clause 5.4(2)</i> A user must, when reasonably requested by a network operator, use reasonable endeavours to assist the network operator to comply with the network operator's obligation.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No requests were made of users (customers). A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts.									
Issues									
None									
Recommendations									
None									

Item 393 (376) Licence condition 5.1								Compliance rating Compliant 5	
Licence: <i>Generation, Retail</i>									
<i>Electricity Industry Metering Code clause 5.16</i> A user that collects or receives energy data from a metering installation must provide the network operator with the energy data (in accordance with the communication rules) within the timeframes prescribed.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.									
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"/>
Users do not collect or receive energy data to send to network operator (and no communication rules for which there is no need with no other retailer on network). Data is uploaded automatically.									
Issues									
None									
Recommendations									
None									

Item 394 (377) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.17(1)</i> A user must provide standing data and validated (and where necessary substituted or estimated) energy data to the user's customer, to which that information relates, where the user is required by an enactment or an agreement to do so for billing purposes or for the purpose of providing metering services to the customer.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Standing and validated energy data is provided on invoices. There is no enactment to provide data but the Power Purchase Agreements do make provision for meter data to be provided to a customer after month end. Time frames are not specified. Energy data has been provided. Applicable enactments such as the code of conduct do not apply as there are no small use consumers.	
Issues	
None	
Recommendations	
None	

Item 395 (378) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.18</i> A user that collects or receives information regarding a change in the energisation status of a metering point must provide the network operator with the prescribed information, including the stated attributes, within the timeframes prescribed.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No change in energisation status occurred in the audit period.	
Issues	
None	
Recommendations	
None	

Item 396 (379) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(1)</i> A user must, when requested by the network operator acting in accordance with good electricity	

industry practice, use reasonable endeavours to collect information from customers, if any, that assists the network operator in meeting its obligations described in the Code and elsewhere.
Observations
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There has been no request to collect information.
Issues
None
Recommendations
None
Management Actions
Not applicable

Item 397 (380) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(2)</i> A user must, to the extent that it is able, collect and maintain a record of the address, site and customer attributes, prescribed in relation to the site of each connection point, with which the user is associated.	
Observations	
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>	
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.	
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>	
Contacts lists and address, site and customer attributes and sample advice to customers sighted. (There is one substantial customer in PPA)	
Issues	
None	
Recommendations	
None	

Item 398 (381) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(3)</i> A user must, after becoming aware of any change in a site's prescribed attributes, notify the network operator of the change within the timeframes prescribed.	
Observations	
Documents <input type="checkbox"/> Compliance <input type="checkbox"/>	
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.	
Process <input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>	
There has been no change to site attributes. There has been no advice from users.	

Issues
None
Recommendations
None

Item 399 (382) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(4)</i> A user that becomes aware that there is a sensitive load at a customer's site must immediately notify the network operator's Network Operations Control Centre of the fact.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
No sensitive load exists on network.	
Issues	
None	
Recommendations	
None	

Item 401 (384) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.19(6)</i> A user must use reasonable endeavours to ensure that it does not notify the network operator of a change in an attribute that results from the provision of standing data by the network operator to the user.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, meter data bases.	
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 407 (390) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.21(5)</i> A Code participant must not request a test or audit unless the Code participant is a user and the test or audit relates to a time or times at which the user was the current user or the Code	

participant is the IMO.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
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. Tests were done in accordance with the PPA schedule without a request.									
Issues									
None									
Recommendations									
None									

Item 408 (391) Licence condition 5.1								Compliance rating Not Rated	
Licence: <i>Generation, Retail</i>									
<i>Electricity Industry Metering Code clause 5.21(6)</i> A Code participant must not make a test or audit request that is inconsistent with any access arrangement or agreement.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
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 none inconsistent with the PPA.									
Issues									
None									
Recommendations									
None									

Item 426 (409) Licence condition 5.1								Compliance rating Not Rated	
Licence: <i>Generation, Retail</i>									
<i>Electricity Industry Metering Code clause 5.27</i> Upon request, a current user must provide the network operator with customer attribute information that it reasonably believes are missing or incorrect within the timeframes prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no requests.									
Issues									
None									
Recommendations									
None									

Item 433 (416) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 6.1(2)</i> A user must, in relation to a network on which it has an access contract, comply with the rules, procedures, agreements and criteria prescribed.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter drawings, calibration results, meter data bases, PPAs.	
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 retailer not complying with the agreements.	
Issues	
None	
Recommendations	
None	

Item 435 (418) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 7.2(1)</i> Code participants must use reasonable endeavours to ensure that they can send and receive a notice by post, facsimile and electronic communication and must notify the network operator of a telephone number for voice communication in connection with the Code.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Inspected substations and sample installations. Documents: Meter data bases.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The requirement is satisfied as users can be contacted by post, facsimile or electronic communication means. There have been no complaints from users.	
Issues	
None	
Recommendations	
None	

Item 437 (420) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 7.2(4)</i> A Code participant must notify its contact details to a network operator with whom it has entered into an access contract within 3 business days after the network operator's request.	
Observations	
Documents	<input type="checkbox"/> Compliance <input type="checkbox"/>
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: Not applicable	

Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The obligation is on the customer or retailer and not on the network operator. Network operator has made no requests.									
Issues									
None									
Recommendations									
None									

Item 438 (421) Licence condition 5.1	Compliance rating Not Rated								
Licence: <i>Generation, Retail</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 Asset 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 obligation is on the customer or retailer and not on the network operator. The retailer and the network operator is the same person and notification is superfluous. There have been no customer requests.									
Issues									
None									
Recommendations									
None									

Item 439 (422) Licence condition 5.1	Compliance rating Compliant 5								
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: PPA confidentiality requirements.									
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.									
Issues									
None									
Recommendations									
None									

Item 440 (423) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: Not applicable	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There is no information required to be disclosed.	
Issues	
None	
Recommendations	
None	

Item 441 (424) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. Documents:	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	
Recommendations	
None	

Item 442 (425) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. Documents:	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	

Issues
None
Recommendations
None

Item 443 (426) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. Documents:	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	
Recommendations	
None	

Item 444 (427) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</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 Commercial Manager, Manager North & South, Assistant Managers North and South. Documents:	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no metering disputes in the audit period.	
Issues	
None	
Recommendations	
None	

Item 445 (428) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 8.3(2)</i> The disputing parties must at all times conduct themselves in a manner which is directed towards achieving the objective of dispute resolution with as little formality and technicality and with as	

much expedition as the requirements of Part 8 of the Code and a proper hearing and determination of the dispute, permit.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Documents:									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There have been no metering disputes in the audit period.									
Issues									
None									
Recommendations									
None									