



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

TEC Desert Pty Ltd & TEC Desert No. 2 Pty Ltd (t/a Southern Cross Energy Partnership)

**Electricity Retail Licence ERL 7,
Electricity Distribution Licence EDL 3
Electricity Transmission Licence ETL 4
Electricity Generation Licence EGL 13
Performance Audit**

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



McGill Engineering Services Pty Ltd

Engineering, Adjudication & Arbitration Services ABN 45 106 691 169

Aron Willis
General Manager
TransAlta Energy Australia Pty Ltd
(Manager of Southern Cross Energy Partnership)
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Dear Mr Willis

Performance Audit Electricity Licences

The fieldwork on the performance audit of Distribution Licence EDL 3, Transmission Licence ETL 4, Generation Licence EGL 13 and Retail Licence ERL 7, 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 were two non complying items noted they were not significant items.

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the Distribution Licence EDL 3, Transmission Licence ETL 4, Generation Licence EGL 13 and Retail Licence ERL 7 for the audit period on the relevant clauses referred to within the scope section of this report.

Yours sincerely

Kevan McGill
Director

Date 15 March 2012

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1 Executive Summary

Southern Cross Energy (SCE) holds Distribution Licence EDL 3, Transmission Licence ETL 4, Generation Licence EGL 13 and Retail Licence ERL 7 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.

SCE operates Distribution & Transmission networks around the mining towns of Leinster and Mt Keith (the northern system) and a separate non contiguous network in the Kalgoorlie and Kambalda regions (the southern system). 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 sites (Leinster/Mt Keith and Kalgoorlie/Kambalda) 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 SCE.

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 were two non complying items noted they were not significant items.

In my opinion, the Licensee maintained, in all material aspects, control procedures in relation to the Distribution Licence EDL 3, Transmission Licence ETL 4, Generation Licence EGL 13 and Retail Licence ERL 7 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.

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

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

Compliance status	Rating	Description of compliance
COMPLIANT	5	Compliant with no further action required to maintain compliance
COMPLIANT	4	Compliant apart from minor or immaterial recommendations to improve the strength internal controls to maintain compliance
COMPLIANT	3	Compliant with major or material recommendations to improve the strength of internal controls to maintain compliance
NON-COMPLIANT	2	Does not meet minimum requirements
SIGNIFICANTLY NON-COMPLIANT	1	Significant weaknesses and/or serious action required
NOT APPLICABLE	N/A	Determined that the compliance obligation does not apply to the Licensee's business operations
NOT RATED	N/R	No relevant activity took place during the audit period, therefore it is not possible to assess compliance

The total number of licence obligations assessed are summarised by audit priority ratings below.

		Audit Priority				
Assessment	Total	1	2	3	4	5
Compliant 5	67	0	0	0	52	15
Compliant 4	4	0	0	0	4	0
Compliant 3	0	0	0	0	0	0
Non-compliant 2	2	0	0	0	2	0
Significantly Non-compliant 1	0	0	0	0	0	0
Not Applicable	13	0	0	0	12	1
Not Rated	59	0	0	1	47	11

* 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 Distribution, Transmission, 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, Transmission, Generation and Retail Licences through a combination of enquiries, examination of documents and detailed testing for Distribution Licence EDL 3, Transmission Licence ETL 4, Generation Licence EGL 13 and Retail Licence ERL 7 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, 451 (434² in previous manual) and 465 – 466 (448-449) have been excluded from the audit. Conditions relating to the Electricity Corporations are not applicable (78-80, 90-92, 350 (333), 456-460 (439-443)). 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 (368)) have been excluded as these apply to Small Use Consumers only. Item 386 (369) relates to small use consumers only as there is no other enactment requiring such actions and therefore excluded. Conditions relating to Obligations to Connect Regulations (72-77) only apply to small use customers and therefore have been deleted from the audit. Conditions 467-469 (450-452) in Network Quality and Reliability Code are only applicable to Small Use Consumers and have therefore been deleted. 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. As the *Authority* has not reviewed any documents item 434 is not applicable and has been excluded. For the purposes of the Wholesale Electricity Market Regulations (Rules), SCE is not a registered Network Operator. The WEM only sees the interface point at the Boulder connection, and not the transmission system behind the fence. The exception is the town of Kambalda. In both cases though, Western Power holds the metering data etc for Boulder connection and the Kambalda Township, with the WEM only seeing these 2 points. SCE is a Market Customer and a Market Generator under the WEM Rules.

As the Licensee's network operator does not operate in the WEM conditions relevant to the market rules are not applicable, (these are obligations 345-349 (328-332)). Western Power meters power transferred to/from the SWIS.

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.

The Licensee is vertically integrated and accordingly there is no need for communication rules or link criteria for intra organisation communication. Items 402-404 (385-387) rely on communication rules which are not requirements so the consequent energy data request forms are not required. The majority of the Licensee's meters were installed before the inception of the Meter Code and therefore by clause 3.14(1) is not required to update those metering installations to the Code. Where there have been new metering installations they are covered by Power Procurement Agreements which establish the

² Items in brackets are item numbers from last audit (previous manual)

metering requirements. The organization has Power Procurement Agreements with all of its customers and these deal with service level agreements (representing the written agreement that sets out the terms and conditions under which the network operator provides metering services to a user). The Power Procurement Agreements cover the agreed metrology processes and therefore there is no business need for a separate metrology procedure. The Power Procurement Agreements (PPA) covers the data requirements of the Code including communication requirements and validation, substitution and estimation requirements. A separate document for metrology procedures would meet the Meter Code requirements but is unlikely to be materially different from the PPA and given the meter installation pre-dates the Code and therefore is not required to be upgraded to the Code; compliance with Code installation requirements is unlikely. These PPAs date from 1996 and predate therefore the Act and subsidiary legislation. Should the opportunity arise for new customers or new contracts the Licensee may wish to consider a separate metrology procedure which the contracts will then refer. This procedure would then need to be approved by the Authority.

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The Metering Code requirements were audited in the context of the above relationships between licences and with their customers.

Items 387-388 (370-371) do not apply as they are related to the Customer Transfer Code.

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, Kambalda and Mt Keith, Leinster 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

No.	Condition	Issue/Corrective Action
1	A network operator must treat all retailers which are its associates on an arms-length basis.	There is no business need for arms-length treatment until another retailer is available on the network. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
2	A network operator must ensure that no retailer which is its associate receives a benefit in respect of the Electricity Industry Customer Transfer Code unless the benefit is either attributable to the arms-length application of the Electricity Industry Customer Transfer Code or the benefit is made available to all other retailers.	The licensee is essentially vertically integrated. There is no business need to establish arms-length treatment until another retailer becomes available on the network. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
3	A network operator must publish a request for standing data form which must comply with Annex 1 of the Electricity Industry Customer Transfer Code.	There is no business need for a published standing data form. Data information requirements are established by contract. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
4	A network operator must publish a request for historical data form which must comply with Annex 2 of the Electricity Industry Customer Transfer Code.	There is no business need for a published historical data form. Data information requirements are established by contract. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
5	If a network operator publishes an amended data request form it must comply with Annex 1 or Annex 2 of the Electricity Industry Customer Transfer Code, as applicable.	There is no business need for a published historical data form. Data information requirements are established by contract. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
7	A retailer, unless otherwise agreed, must submit a data request electronically and must not submit more than a prescribed number of standing or historical data requests in a business day.	As the licensee is essentially vertically integrated there is no business need for protocols for passing information to their retailer. Approach the Office of Energy to seek an exemption from this requirement.
12	A network operator must comply with clause 3.7(1) of the Electricity Industry Customer Transfer Code within defined timeframes depending on the number of standing or historical data requests that the retailer submits.	The data requirements are specified in the contracts. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
13	A network operator must provide the requested data under a valid data request electronically in a format in accordance with the communication rules if they have been approved or otherwise in accordance with the metering code.	Data information requirements are established by contract. The Licensee should approach the Office of Energy to seek an exemption from this requirement.

15	A network operator must electronically notify the retailer of the most likely exit points to which a data request relates, up to a maximum of 10, if a retailer submits a data request under clause 3.4 and the network operator has not allocated a UMI for the exit point and it is unable to determine a single exit point to which the data request relates.	As the licensee is essentially vertically integrated there is no business need for protocols for communication between network operator and their retailer. The contracts allow for aggregated information for their exit points. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
22	A network operator must publish a customer transfer request form which must comply with Annex 3 of the Electricity Industry Customer Transfer Code.	There is no business need for a published customer transfer request form. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
46	A network operator must submit communication rules to the <i>Authority</i> within six months after the commencement of the Electricity Industry Customer Transfer Code.	There is no business need for protocols for communication between retailer and distributor or transmitter. Communication rules have not been submitted. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
47	A network operator must take certain action before submitting the communication rules to the <i>Authority</i> .	There is no business need for protocols for communication between retailer and distributor or transmitter. Communication rules have not been submitted. The Licensee should approach the Office of Energy to seek an exemption from this requirement.
48	A network operator and a retailer must comply with approved communication rules.	There are no approved communication rules. 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.
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.
62	A network operator's customer transfer request form must require a retailer to provide certain information.	There is no business need for a customer transfer request form unless another retailer is available on the network. 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 all of 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 150 (110/40) 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	K McGill, J McLoughlin	AUS 502: Audit Evidence AUS 806: Performance Auditing

<ul style="list-style-type: none">• Compliance procedures• Compliance attitude		
4. Reporting	K McGill	ASA 300 Planning AUS 806: Performance Auditing

2.9 LICENCE

The Licensee is a partnership 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/Codes. Metering and supply conditions are covered by these PPAs. As the metering installation predate the Meter Code, upgrading of meter installations is not required. The PPAs also specify supply quality to the ruling standards of the day and specify interruption durations and frequency with liquidated damages for exceeding the contracted targets. The PPAs are an agreement under the Network Quality and Reliability of Supply Code to exclude or modify the provisions of Part 2 of that Code. The parties freely entered into the agreement with an understanding of the advantages and disadvantages of the quality specifications (which were the ruling Australian Standards of the day) and agreed to the interruptions with the associated penalties as reasonable for both parties.

2.10 OVERALL CONCLUSION

In my opinion, the Licensee has maintained a good level of compliance with the licences conditions. While there were two non complying items noted they were not significant items..

In my opinion, the Licensee maintained, in all material aspects, effective control procedures in relation to the for Distribution Licence EDL 3, Transmission Licence ETL 4, Generation Licence EGL 13 and Retail Licence ERL 7 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 24

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 D=Distribution T = Transmission R = Retail	Type	Review priority	Rating						N ^a	N ^r
Licence Conditions – Licence Clause –Obligations- Electricity Industry Act Section										1	2	3	4	5	N ^a	N ^r
81.	15.1/18.1/ 15.1/22.1/	s ³ 13(1)	1	C	Low	M	G D T R	NR	5					<input checked="" type="checkbox"/>		
82.	16.1/19.1/ 16.1	s14(1)(a)	1	C	Low	M	G D T	NR	5					<input checked="" type="checkbox"/>		
83.	16.1 & 16.2/19.1 & 19.2 /16.1 & 16.2	s14(1)(b)	2	C	Medium	M	G D T	2	4					<input checked="" type="checkbox"/>		
Licence Conditions – Licence Clause –Obligations- Electricity Industry Act Section										1	2	3	4	5	N ^a	N ^r
84.	16.3/19.3/ 16.3	s14(1)(c)	1	C	Low	M	G D T	NR	5					<input checked="" type="checkbox"/>		
85.	4.1/4.1/4.1/ 4.1	s17(1)	1	C	Low	M	G D T R	NR	5					<input checked="" type="checkbox"/>		
86	5.1/5.1/5.1/ 5.1	s31(3)	1	C	Low	M	G D T R	NR	5					<input checked="" type="checkbox"/>		
87.	5.1/5.1/5.1/ 5.1	s41(6)	2	C	Medium	M	G D T R	2	4							<input checked="" type="checkbox"/>
96	5.1/5.1/5.1	s115(2)	2	C	Medium	M	D T 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	12.2/15.2/ 12.2	2	B	Medium	W	G D T	2	3							<input checked="" type="checkbox"/>
104.	s11	12.3/15.3/ 12.3	2	C	Medium	M	G D T	2	4					<input checked="" type="checkbox"/>		
105.	s11	13.1/16.1/ 13.1/20.1	2	C	Medium	M	G D T R	2	4					<input checked="" type="checkbox"/>		
107.	s11	15.2/18.2/ 15.2/22.2	2	C	Medium	M	G D T R	2	4					<input checked="" type="checkbox"/>		
108.	s11	16.4/19.4/ 16.4	2	C	Medium	M	G D T	2	4					<input checked="" type="checkbox"/>		
109.	s11	17.1/20.1/ 17.1/23.1	2	C	Medium	M	G D T R	2	4							<input checked="" type="checkbox"/>
110.	s11	18.1/21.1/ 18.1/24.1	2	C	Medium	M	G D T R	2	4		<input checked="" type="checkbox"/>					
111.	s11	19.2/22.2/ 19.2/25.2	2	C	Medium	M	G D T R	2	4							<input checked="" type="checkbox"/>
112.	s11	20.1/23.1/ 20.1/26.1	2	C	Medium	M	G D T R	2	4							<input checked="" type="checkbox"/>

³ s= Section of Act

Southern Cross Energy - Electrical Distribution, Transmission, Generation & Retail
Licences – Audit report

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 D=Distribution T = Transmission R = Retail	Type	Review priority	Rating	1	2	3	4	5	N ^a	N ^r
Licence Conditions (2010 manual – 2008 manual) – Licence clause Obligations- Electricity Industry Metering Code Clause																
317 (300)	5.1	2.2(1)(a)	1 C	Low	M	D T	NR	5							☑	
318 (301)	5.1	2.2(1)(b)	2 C	Medium	M	D T	2	4							☑	
319 (302)	5.1	3.1	2 C	Medium	M	D T	2	4					☑			
320 (303)	5.1	3.2(1)	2 C	Medium	M	D T	2	4								☑
321 (304)	5.1	3.3(1)	2 C	Medium	M	D T	2	4						☑		
322 (305)	5.1	3.3(3)	2 C	Medium	M	D T	2	4								☑
323 (306)	5.1	3.5(1) & (2)	2 C	Medium	M	D T	2	4						☑		
324 (307)	5.1	3.5(3)	2 C	Medium	M	D T	2	4						☑		
325 (308)	5.1	3.5(4)	2 C	Medium	M	D T	2	4					☑			
326 (309)	5.1	3.5(6)	2 C	Medium	M	G D T R	2	4								☑
327 (310)	5.1	3.5(9)	2 C	Medium	M	D T	2	4						☑		
328 (311)	5.1	3.7	2 C	Medium	M	D T	2	4								☑
329 (312)	5.1	3.8	2 C	Medium	M	D T	2	4						☑		
330 (313)	5.1	3.9(3)	2 C	Medium	M	D T	2	4						☑		
331 (314)	5.1	3.9(7)	2 C	Medium	M	D T	2	4					☑			
332 (315)	5.1	3.9(9)	2 C	Medium	M	D T	2	4								☑
333 (316)	5.1	3.10	2 C	Medium	M	D T	2	4						☑		
334 (317)	5.1	3.11(1)	2 C	Medium	M	D T	2	4						☑		
335 (318)	5.1	3.11(2)	2 C	Medium	M	D T	2	4						☑		
336 (319)	5.1	3.11(3)	2 C	Medium	M	G D T R	2	4								☑
337 (320)	5.1	3.12(1)	2 C	Medium	M	D T	2	4							☑	
338 (321)	5.1	3.12(2)	2 C	Medium	M	D T	2	4							☑	
339 (322)	5.1	3.12(3)	2 C	Medium	M	D T	2	4						☑		
340 (323)	5.1	3.12(4)	2 C	Medium	M	D T	2	4						☑		
341 (324)	5.1	3.13(1)	2 C	Medium	M	D T	2	4						☑		
342 (325)	5.1	3.13(3)(c)	2 C	Medium	M	D T	2	4						☑		
343 (326)	5.1	3.13(4)	2 C	Medium	M	D T	2	4						☑		
344 (327)	5.1	3.14(3)	2 C	Medium	M	D T	2	4							☑	
351 (334)	5.1	3.20(1)	2 C	Medium	M	D T	2	4								☑
352 (335)	5.1	3.20(3)	2 C	Medium	M	D T	2	4								☑
353 (336)	5.1	3.21(1)	2 C	Medium	M	D T	2	4								☑
354 (337)	5.1	3.21(2)	2 C	Medium	M	D T	2	4								☑
355 (338)	5.1	3.22	2 C	Medium	M	D T	2	4								☑
356 (339)	5.1	3.23(a)	2 C	Medium	M	D T	2	4								☑
357 (340)	5.1	3.23(b)	2 C	Medium	M	D T	2	4								☑
358 (341)	5.1	3.25	2 C	Medium	M	D T	2	4								☑
359 (342)	5.1	3.27	2 C	Medium	M	G R	2	4								☑
360 (343)	5.1	3.29	2 C	Medium	M	D T	2	4							☑	
361 (344)	5.1	4.1(1)	2 C	Medium	M	D T	2	4						☑		
362 (345)	5.1	4.1(2)	2 C	Medium	M	D T	2	4						☑		
363 (346)	5.1	4.1(3)	2 C	Medium	M	D T	2	4						☑		
364 (347)	5.1	4.2(1)	2 C	Medium	M	D T	2	4						☑		

Southern Cross Energy - Electrical Distribution, Transmission, Generation & Retail
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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 D=Distribution T = Transmission R = Retail	Type	Review priority	Rating							
Licence Conditions (2010 manual – 2008 manual) – Licence clause										1	2	3	4	5	N ^a	N ^r
Obligations- Electricity Industry Metering Code Clause																
365 (348)	5.1	4.2(2)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
366 (349)	5.1.	4.4(1)	1	C	Low	M	G D T R	NR	5					<input checked="" type="checkbox"/>		
367 (350)	5.1	4.5(2)	1	C	Low	M	G D T 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"/>
369 (352)	5.1	4.6(1)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
370 (353)	5.1	4.6(2)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
371 (354)	5.1	4.7	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
372 (355)	5.1	4.8(3)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
373 (356)	5.1.	4.8(4)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
374 (357)	5.1	4.8(5)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
375 (358)	5.1	4.9	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
376 (359)	5.1	5.1(1)	1	C	Low	M	D T	NR	5							<input checked="" type="checkbox"/>
377 (360)	5.1	5.1(2)	1	C	Low	M	D T	NR	5							<input checked="" type="checkbox"/>
378 (361)	5.1	5.3	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
379 (362)	5.1	5.4(1)	1	C	Low	M	D T	NR	5							<input checked="" type="checkbox"/>
380 (363)	5.1	5.4(2)	1	C	Low	M	G R	NR	5							<input checked="" type="checkbox"/>
381 (364)	5.1	5.5(2)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
382 (365)	5.1	5.5(3)	2	C	Medium	M	G R	2	4					<input checked="" type="checkbox"/>		
383 (366)	5.1	5.6(1)	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
384 (367)	5.1	5.7	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
389 (372)	5.1.	5.12(1)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
390 (373)	5.1	5.13	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
391 (374)	5.1	5.14(3)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
392 (375)	5.1	5.15	2	C	Medium	M	D T	2	4					<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"/>
400 (383)	5.1	5.19(5)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
401 (384)	5.1	5.19(6)	1	C	Low	M	G R	NR	5							<input checked="" type="checkbox"/>
405 (388)	5.1	5.21(2)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
406 (389)	5.1	5.21(4)	2	C	Medium	M	D T	2	4					<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"/>
409 (392)	5.1	5.21(8)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
410 (393)	5.1	5.21(9)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
411 (394)	5.1	5.21(11)	2	C	Medium	M	D T	2	4				<input checked="" type="checkbox"/>			
412 (395)	5.1	5.21(12)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
413 (396)	5.1	5.22(1)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		

Southern Cross Energy - Electrical Distribution, Transmission, Generation & Retail
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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 D=Distribution T = Transmission R = Retail	Type	Review priority	Rating						
Licence Conditions (2010 manual – 2008 manual) – Licence clause										1	2	3	4	5	N ^a	N ^r
Obligations- Electricity Industry Metering Code Clause																
414 (397)	5.1	5.22(2)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
415 (398)	5.1	5.22(3)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
416 (399)	5.1	5.22(4)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
417 (400)	5.1	5.22(5)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
418 (401)	5.1	5.22(6)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
419 (402)	5.1	5.23(1)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
420 (403)	5.1	5.23(2)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
421 (404)	5.1	5.24(1)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
422 (405)	5.1	5.24(2)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
423 (406)	5.1	5.24(3)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
424 (407)	5.1	5.24(4)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
425 (408)	5.1	5.25	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
426 (409)	5.1	5.27	2	C	Medium	M	G R	2	4							<input checked="" type="checkbox"/>
427 (410)	5.1	5.29	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
428 (411)	5.1	5.30(1)	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
429 (412)	5.1	5.31(1)	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
430 (413)	5.1	5.31(2)	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
431 (414)	5.1	5.34	2	C	Medium	M	D T	2	4						<input checked="" type="checkbox"/>	
432 (415)	5.1	6.1(1)	2	C	Medium	M	D T	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 D T R	NR	5					<input checked="" type="checkbox"/>		
436 (419)	5.1	7.2(2)	2	C	Medium	M	D T	2	4					<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 D T R	NR	5							<input checked="" type="checkbox"/>
442 (425)	5.1	8.1(2)	1	C	Low	M	G D T R	NR	5							<input checked="" type="checkbox"/>
443 (426)	5.1	8.1(3)	1	C	Low	M	G D T R	NR	5							<input checked="" type="checkbox"/>
444 (427)	5.1	8.1(4)	2	C	Medium	M	G D T R	2	4							<input checked="" type="checkbox"/>
445 (428)	5.1	8.3(2)	1	C	Low	M	G D T R	NR	5							v
Licence Conditions (2010 manual – 2008 manual) – Licence clause										1	2	3	4	5	N ^a	N ^r
Obligations Network Quality of Supply Code - Code Number																
446 (429)	5.1	5(1)	1	C	Low	M	D T	NR	5					<input checked="" type="checkbox"/>		
447 (430)	5.1	8	1	C	Low	M	D T	NR	5							<input checked="" type="checkbox"/>
448 (431)	5.1	9	1	C	Low	M	D T	NR	5					<input checked="" type="checkbox"/>		
449 (432)	5.1	10(1)	1	C	Low	M	D T	NR	5					<input checked="" type="checkbox"/>		
450 (433)	5.1	10(2)	1	C	Low	M	D T	NR	5					<input checked="" type="checkbox"/>		
452 (435)	5.1	13(2)	1	C	Low	M	D T	NR	5					<input checked="" type="checkbox"/>		
453 (436)	5.1	13(3)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
454 (437)	5.1	14(8)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
455 (438)	5.1	15(2)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
461 (444)	5.1	23(1)	1	C	Low	M	D T	NR	5					<input checked="" type="checkbox"/>		

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Licence Conditions (2010 manual – 2008 manual) – Licence clause Obligations Network Quality of Supply Code - Code Number										1	2	3	4	5	N ^a	N ^r
462 (445)	5.1	23(2)	2	C	Medium	M	D T	2	4					<input checked="" type="checkbox"/>		
463 (446)	5.1	24(3)	2	C	Medium	M	D T	2	4							<input checked="" type="checkbox"/>
464 (447)	5.1	24(4)	2	C	Medium	M	D T	2	4							<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.	
Observations	
The Licensee has met the reporting manual requirements except not all were on time.	
Issues	
Annual returns need to be on time (2009 and 2010 returns were late).	
Recommendations	
Develop a compliance manual with all regulatory requirements and the corresponding time obligations.	

Item 432 (415) Licence condition 5.1	Compliance rating Not Compliant 2
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 6.1(1)</i> A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes prescribed.	
Observations	
The procedures are laid out in the power purchase agreements. There is no evidence of departures from the agreements There have been no complaints. There is no separate metrology procedure.	
Issues	
The metrology requirements are defined in the PPAs which have been in place since 1996 and therefore predate Code and are satisfied. If the opportunity arises such as a new contract the Licensee should develop for approval a metrology procedure document.	
Recommendations	
If the opportunity arises such as a new contract the Licensee should develop for approval a metrology procedure document.	

2.12.3 SUGGESTIONS FOR IMPROVEMENT

Item 319 (302) Licence condition 5.1	Compliance rating Compliant 4
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.1</i> A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	
Observations	
The meter installations predate the licence and therefore will be grandfathered as compliant (refer Meter Code 3.14(1)) regardless of the criteria against which they are measured. The meters have been tested but a number are not within the Meter Code accuracy levels. There is no metrology procedure for the organisation but the individual Power Purchase Agreements (PPA) cover meter installations and accuracy and are the agreed metrology requirements. The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and where protection class CTs are allowed under the Code (3.14(4)).	
Issues	
Some meters do not meet the Meter Code accuracy requirements and while the Licensee is not obliged to upgrade the meter installations (3.14(1)), the customers should be consulted to see if they wish to upgrade the meters. Given that it is unlikely that the CTs would be upgraded to metering class CTs, the cost benefit for changing the meters for mainly smaller loads may not be positive. If the opportunity arises for a new contract a separate metrology procedure should be developed. This would then require to be submitted to the <i>Authority</i> for approval.	
Recommendations	
Upgrade the meters to code requirements if the customers approve. If the opportunity arises develop and seek approval of a metrology procedure.(non Mandatory recommendation – 11.9)	

Item 331 (314) Licence condition 5.1	Compliance rating Compliant 4
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.9(7)</i> For a metering installation used to supply a customer with requirements above 1000 volts that require a VT and whose annual consumption is below 750MWh, the metering installation must meet the relevant accuracy requirements of Type 3 metering installation for active energy only.	
Observations	
The installations predate the meter Code and therefore are grandfathered and do not require updating to meet the requirements of the Code. Refer to 3.14(1) of the Meter Code. The sample calibrations indicate that not all meters meet the requirements and the CTs do not.	
Issues	
Some meters do not meet the Meter Code accuracy requirements and while the Licensee is not obliged to upgrade the meter installations (3.14(1)), the customers should be consulted to see if they wish to upgrade the meters. Given that it is unlikely that the CTs would be upgraded to metering class CTs, the cost benefit for changing the meters for mainly smaller loads may not be positive.	
Recommendations	
Upgrade the meters to code requirements if the customers approve. (non Mandatory recommendation – 11.9)	

Item 411 (394) Licence condition 5.1	Compliance rating Compliant 4
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(11)</i> A network operator must advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors, and must restore the accuracy of the metering installation in accordance with the applicable service level agreement.	
Observations	
The Licensee is not obliged to upgrade the metering installations (3.14(1)). But the customers should be consulted to see if the accuracy of some meters should be improved as the tests indicated that some meters did not meet Code requirements. The Customer was advised of the tests. The customer installed the meters originally.	
Issues	
Some meters do not meet the Meter Code accuracy requirements and while the Licensee is not obliged to upgrade the meter installations (3.14(1)), the customers should be consulted to see if they wish to upgrade the meters. Given that it is unlikely that the CTs would be upgraded to metering class CTs, the cost benefit for changing the meters for mainly smaller loads may not be positive.	
Recommendations	
Upgrade the meters to code requirements if the customers approve. (non Mandatory recommendation – 11.9)	

The Licensee should also consider seeking exemptions from the Office of Energy from the Metering Code and Quality and Reliability Code (by Code amendment) 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. If the opportunity arises to amend the PPAs then the agreement to vary the quality and reliability obligations of the Code should be taken and develop a separate metrology procedure.

The General Manager should be responsible to do this by June 2012.

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.

- Distribution Licence
- Transmission Licence
- 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
- Meter registry
- 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 Distribution Licence condition 18.1, Transmission Licence 15.1, Generation Licence 15.1, Retail Licence condition 22.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission, 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 <input checked="" type="checkbox"/>
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 Distribution Licence condition 19.1, Transmission Licence 16.1, Generation Licence 16.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission, 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 <input checked="" type="checkbox"/>
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 Distribution Licence condition 19.1 & 19.2, Transmission Licence 16.1 & 16.2, Generation Licence 16.1 & 16.2	Compliance rating Compliant 5
Licence: <i>Distribution Transmission, 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 <input checked="" type="checkbox"/>
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 Distribution Licence condition 19.3 Transmission Licence 16.3, Generation Licence 16.3	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission, 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 <input checked="" type="checkbox"/>
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 Distribution Licence condition 4.1, Transmission Licence 4.1, Generation Licence 4.1, Retail Licence condition 4.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission, 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	<input checked="" type="checkbox"/>						
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	Compliance rating
Distribution Licence condition 5.1, Transmission Licence 5.1, Generation Licence 5.1 Retail Licence condition 5.1	Compliant 5
Licence: <i>Distribution, Transmission, 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	Compliance rating
Distribution Licence condition 5.1, Transmission Licence 5.1, Generation Licence 5.1, Retail Licence condition 5.1	Not Rated
Licence: <i>Distribution, Transmission, 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 Distribution Licence condition 5.1, Transmission Licence 5.1, Generation Licence 5.1, Retail Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission, 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 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 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 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: <i>Distribution, Transmission, Generation</i>	
<i>Distribution Licence condition 15.2 Transmission Licence condition 12.2, 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 type="checkbox"/> Compliance <input 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 Electricity Industry Act section 11	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission, Generation</i>	
<i>Distribution Licence condition 15.3 Transmission Licence condition 12.3, 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						Compliance rating			
Electricity Industry Act section 11						Compliant 5			
Licence: Distribution, Transmission, Generation, Retail									
Distribution Licence condition 16.1, Transmission Licence condition 13.1, Generation Licence condition 13.1, Retail Licence Condition 20.1									
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						Compliance rating			
Electricity Industry Act section 11						Compliant 5			
Licence: Distribution, Transmission, Generation, Retail									
Distribution Licence condition 18.2, Transmission Licence condition 15.2, Generation Licence condition 15.2, Retail Licence Condition 22.2									
A Licensee must comply, and require its auditor to comply, with the Authority's 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 Authority, 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>Distribution, Transmission, Generation</i>	
<i>Distribution Licence condition 19.4 Transmission Licence condition 16.4, 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 Electricity Industry Act section 11	Compliance rating Not Rated
Licence: <i>Distribution, Transmission, Generation, Retail</i>	
<i>Distribution Licence condition 20.1, Transmission Licence condition 17.1, 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 so not able to assess compliance with advice requirements.	
Issues	
None	
Recommendations	
None	

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.	
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. (2009 and 2010 reports were late)									
Recommendations									
Develop a compliance manual with all regulatory requirements and the corresponding time obligations.									

Item 111 Electricity Industry Act section 11							Compliance rating Not Rated		
Licence: Distribution, Transmission, Generation, Retail									
Distribution Licence condition 22.2, Transmission Licence condition 19.2, Generation Licence condition 19.2, Retail Licence Condition 25.2									
A Licensee must publish any information it is directed by the Authority 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 Authority 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: Distribution, Transmission, Generation, Retail									
Distribution Licence condition 23.1, Transmission Licence condition 20.1, Generation Licence condition 20.1,Retail Licence Condition 26.1									
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 Authority. All material communication with the Authority 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 317 (300) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 2.2(1)(a)</i> A network operator must treat all Code participants that are its associates on an arms-length basis.	
Observations	
Documents	<input type="checkbox"/> Compliance <input checked="" 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 checked="" type="checkbox"/>
The retailer and distributor are the same organisation and there is no alternative retailer on the network. Provided there is no alternative retailer, there is no commercial reason for the network operator to treat the retailer on an arms-length basis and the requirement is assessed as Not Applicable.	
Issues	
None	
Recommendations	
None	

Item 318 (301) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 2.2(1)(b)</i> A network operator must ensure that no Code participant that is its associate receives a benefit in respect of the Code unless the benefit is attributable to an arm's length application of the Code or is also made available to all other Code participants on the same terms and conditions.	
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 retailer and distributor is the same person and as there is no alternative retailer on the network to require arms length treatment, no differential treatment is possible. Accordingly the issue is not applicable during the audit period.	
Issues	
None	
Recommendations	
None	

Item 319 (302) Licence condition 5.1	Compliance rating Compliant 4
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.1</i> A network operator must ensure that its meters meet the requirements specified in the applicable metrology procedure and also comply with any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act.	

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 load data.									
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 installations predate the licence and therefore will be grandfathered as compliant (refer Meter Code 3.14(1) regardless of the criteria against which they are measured. The meters have been tested but a number are not within the Meter Code accuracy levels. There is no metrology procedure for the organisation but the individual Power Purchase Agreements (PPA) cover meter installations and accuracy and are the agreed metrology requirements. The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and where protection class CTs are allowed under the Code (3.14(4)).									
Issues									
Some meters do not meet the Meter Code accuracy requirements and while the Licensee is not obliged to upgrade the meter installations (3.14(1)), the customers should be consulted to see if they wish to upgrade the meters. Given that it is unlikely that the CTs would be upgraded to metering class CTs, the cost benefit for changing the meters for mainly smaller loads may not be positive. If the opportunity arises for a new contract a separate metrology procedure should be developed. This would then require to be submitted to the <i>Authority</i> for approval.									
Recommendations									
Upgrade the meters to code requirements if the customers approve. If the opportunity arises develop and seek approval of a metrology procedure.(non Mandatory recommendation – 11.9)									

Item 320 (303)							Compliance rating		
Licence condition 5.1							Not Rated		
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.2(1)</i> An accumulation meter must at least conform to the requirements specified in the applicable metrology procedure and display, or permit access to a display of, the accumulated electricity production or consumption at the metering point in the manner 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: Reviewed meter information.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
There are no accumulation meters (non interval meters).									
Issues									
None									
Recommendations									
None									

Item 321 (304)				Compliance rating	
Licence condition 5.1				Compliant 5	
Licence: <i>Distribution, Transmission</i>					
<i>Electricity Industry Metering Code clause 3.3(1)</i> An interval meter must at least have an interface to allow the interval energy data to be downloaded in the manner prescribed using an interface compatible with the requirements specified in the applicable metrology procedure.					
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: Reviewed meter information.									
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 meters have interfaces to download data but interval data is being collected by the SCADA system and the accumulated data in the meter is not used. The interval data can be downloaded to a portable device/laptop and has been successfully tested as part of the calibration of meters. There is no general metrology procedure, but metrology is defined in the power purchase agreements and while not the <i>applicable metrology procedure</i> are the agreed metrology requirements.									
Issues									
None.									
Recommendations									
None.									

Item 322 (305)							Compliance rating		
Licence condition 5.1							Not Rated		
Licence: Distribution, Transmission									
Electricity Industry Metering Code clause 3.3(3)									
If a metering installation is required to include a communications link, the link must (where necessary), include a modem and isolation device approved under the relevant telecommunications regulations, to allow the interval energy data to be downloaded in the manner prescribed.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. 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"/>
The metering installations communications links are all on internal communication systems and therefore do not have to comply with the relevant telecommunications requirements.									
Issues									
None									
Recommendations									
None									

Item 323 (306)						Compliance rating	
Licence condition 5.1						Compliant 5	
Licence: Distribution, Transmission							
Electricity Industry Metering Code clause 3.5(1)& (2)							
A network operator must ensure that there is a metering installation at every connection point on its network which is not a Type 7 connection point. Unless it is a Type 7 metering installation, the metering installation must meet the functionality requirements 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 site substations and sample installations. Documents viewed include: Metering drawings and calibration test reports.							
Process	<input checked="" type="checkbox"/>	Outcome	<input checked="" type="checkbox"/>	Output	<input checked="" type="checkbox"/>	Reporting	<input checked="" type="checkbox"/>
All connections are metered and item 325 (308) deals with proximity of metering to connection point.							
Issues							
None.							

Recommendations
None

Item 324 (307) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.5(3)</i> A network operator must, for each metering installation on its network, on and from the time of its connection to the network, provide, install, operate and maintain the metering installation in the manner prescribed (unless otherwise agreed).	
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 load information.	
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 were no new meters installed in the audit period. Operating and maintaining the metering installation was in accordance with the otherwise agreed requirements (the PPAs). The metering installations are as agreed with customers.	
Issues	
None	
Recommendations	
None	

Item 325 (308) Licence condition 5.1	Compliance rating Compliant 4
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.5(4)</i> A network operator must ensure that, except for a Type 7 metering installation, the metering point for a revenue metering installation is located as close as practicable to the connection point in accordance with good electricity industry practice.	
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 load information.	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
All customers are metered. Due to the topology of the network not all metering is at the point of connection but is in a practical location (mostly sub stations) in accordance with good electricity industry practice. The customers are happy with the arrangement. (The principal customer originally constructed the network in this configuration).	
Issues	
None	
Recommendations	
None	

Item 326 (309) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission, 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 327 (310)						Compliance rating			
Licence condition 5.1						Compliant 5			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.5(9)</i> If a network operator becomes aware that a metering installation does not comply with the Code, the network operator must advise affected parties of the noncompliance and arrange for the non-compliance to be corrected as soon as practicable.									
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 load information.									
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"/>
Meter Code 3.14(1) does not require installations that predate the Code to be updated. All meters are therefore considered compliant with the code. The network operator has not been aware of any non compliance with the agreed requirements in the PPA.									
Issues									
None									
Recommendations									
None									

Item 328 (311)						Compliance rating			
Licence condition 5.1						Not Rated			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.7</i> All devices that may be connected to a telecommunications network must be compatible with the Telecommunications network and comply with all applicable State and Commonwealth enactments.									
Observations									
Documents	<input type="checkbox"/>	Compliance	<input type="checkbox"/>						
Evidence: interviewed Asset Manager, 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"/>
There are no devices connected to Telecommunications network but instead connect to internal mines communications systems.									

Issues
None
Recommendations
None

Item 329 (312) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.8</i> A network operator must, for each metering installation on its network, ensure that the metering installation is secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	
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 load information.	
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"/>	
Most meters are on controlled access mine sites and all are in locked substations which require access permits for any work. This is adequate security hindering unauthorized access meeting good electricity industry practice. The meters are remotely monitored and any unauthorized changes will be detected.	
Issues	
None	
Recommendations	
None	

Item 330 (313) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.9(3)</i> Each metering installation must meet at least the requirements for that type of metering installation specified in Table 3 in Appendix 1 of 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 drawings, calibration results, meter load information.	
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 installations predate the Meter Code and therefore are grandfathered and do not require updating to meet the requirements of the Code. Refer to 3.14(1) of the Meter Code. The customers have accepted the accuracy in their contract (applicable metrology procedures). Meters have been calibrated. Reactive capability (VAR) is available in meters as required but reactive power is not charged. Clock rates are synchronised with Western Power every 15 minutes.	
Issues	
None	
Recommendations	
None	

Item 331 (314) Licence condition 5.1	Compliance rating Compliant 4
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.9(7)</i> For a metering installation used to supply a customer with requirements above 1000 volts that require a VT and whose annual consumption is below 750MWh, the metering installation must meet the relevant accuracy requirements of Type 3 metering installation for active energy only.	
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 load information. 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"/>
The installations predate the meter Code and therefore are grandfathered and do not require updating to meet the requirements of the Code. Refer to 3.14(1) of the Meter Code. The sample calibrations indicate that not all meters meet the requirements and the CTs do not.	
Issues	
Some meters do not meet the Meter Code accuracy requirements and while the Licensee is not obliged to upgrade the meter installations (3.14(1)), the customers should be consulted to see if they wish to upgrade the meters. Given that it is unlikely that the CTs would be upgraded to metering class CTs, the cost benefit for changing the meters for mainly smaller loads may not be positive.	
Recommendations	
Upgrade the meters to code requirements if the customers approve. (non Mandatory recommendation – 11.9)	

Item 332 (315) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.9(9)</i> If compensation is carried out within the meter then the resultant metering system error must be as close as practicable to zero.	
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 compensation has been carried out within the meter.	
Issues	
None	
Recommendations	
None	

Item 333 (316) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.10</i> A network operator must ensure that any programmable settings within any of its metering installations, data loggers or peripheral devices, that may affect the resolution of displayed or stored data, meet the relevant requirements specified in the applicable metrology procedure and comply with any applicable specifications or guidelines specified by the National Measurement	

Institute under the National Measurement Act.									
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 load information.									
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 metering installations predate the Meter Code and are grandfathered and do not require updating to meet the requirements of the Code, refer Meter Code 3.14(1) regardless of the criteria to which they are assessed. There is no general metrology procedure, only the requirements of the power purchase agreements which are satisfied. The meters cannot meet the requirements of the National Measurement Institute as the specifications apply to measurement class CTs and protection class CTs are allowed under the Code (3.14(4)).									
Issues									
None									
Recommendations									
None									

Item 334 (317)						Compliance rating			
Licence condition 5.1						Compliant 5			
Licence: Distribution, Transmission									
Electricity Industry Metering Code clause 3.11(1) A network operator must ensure that a metering installation on its network permits collection of data within the timeframes and to the level of availability specified.									
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 load information. 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"/>
The metering installations meet the requirements specified in the power purchase agreements which are the applicable service level agreements which is allowed in the Code (3.11(1)(b)).									
Issues									
None									
Recommendations									
None									

Item 335 (318)							Compliance rating		
Licence condition 5.1							Compliant 5		
Licence: Distribution, Transmission									
Electricity Industry Metering Code clause 3.11(2) A network operator must make repairs to the metering installation in accordance with the applicable service level agreement if an outage or malfunction occurs to a metering installation.									
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 load information. 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"/>
The metering repairs have been done in accordance with the requirements of the power purchase agreements (which are the applicable service level agreements with the customers) and are allowed in the Code (3.11(2)).									

Issues
None
Recommendations
None

Item 336 (319) Licence condition 5.1					Compliance rating Not Rated				
Licence: Distribution, Transmission, Generation Retail									
Electricity Industry Metering Code clause 3.11(3) 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. The retailer (Code participant) and the network operator (SCE) are the same person.									
Issues									
None									
Recommendations									
None									

Item 337 (320)					Compliance rating Not Applicable				
Licence condition 5.1									
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.12(1)</i> A network operator must ensure that each metering installation complies with, at least, the prescribed design requirements.									
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"/>
The requirements of 3.12(1) cannot be met as it requires measurement class CTs to be used exclusively for measurement but protection class CTs are permitted by 3.14(4). The metering installations meet the requirements of the applicable metrology procedures (in the PPAs).									
Issues									
None									
Recommendations									
None									

Item 338 (321) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.12(2)</i> A network operator must ensure that instrument transformers in its metering installations comply	

with the relevant requirements of any applicable specifications or guidelines (including any transitional arrangements) specified by the National Measurement Institute under the National Measurement Act and any requirements specified in the applicable metrology procedure.									
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 load information. 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"/>
In some cases protection CTs are used which is permitted by 3.14(4) and therefore standards of metering transformers (specified by the National Measurement Institute under the National Measurement Act) are not applicable. While there is no <i>applicable metrology procedure</i> , the requirements specified are those in the PPAs. The metering installations are grandfathered and meet the requirements agreed with the customers.									
Issues									
None									
Recommendations									
None									

Item 339 (322)							Compliance rating		
Licence condition 5.1							Compliant 5		
Licence: Distribution, Transmission									
Electricity Industry Metering Code clause 3.12(3) A network operator must provide isolation facilities, to the standard of good electricity industry practice, to facilitate testing and calibration of the metering installation.									
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 load information.									
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 metering installations predate the Code and are therefore grandfathered and do not require upgrading. Metering installations have isolation facilities to meet the requirements.									
Issues									
None									
Recommendations									
None									

Item 340 (323)						Compliance rating			
Licence condition 5.1						Compliant 5			
Licence: Distribution, Transmission									
Electricity Industry Metering Code clause 3.12(4) A network operator must maintain drawings and supporting information, to the standard of good electricity industry practice, detailing the metering installation for maintenance and auditing purposes.									
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 load information.									
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"/>
A sample of meter documents (Meter data, drawings, calibration results) has been sighted.									

Issues
None
Recommendations
None

Item 341 (324) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.13(1)</i> A network operator must procure the user or the user's customer to install (or arrange for the installation of) a full check metering installation or partial check metering installation in accordance with the prescribed requirements.	
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 load information.	
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"/>
Full check metering installations are not required and are not provided. Partial Check metering is provided through the SCADA and manual readings of meters occur monthly. In any case as the metering installations were commissioned before the Meter Code came into existence the requirement is deemed as satisfied. (3.14(1)).	
Issues	
None	
Recommendations	
None	

Item 342 (325) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.13(c)</i> A partial check metering installation must be physically arranged in a manner determined by the network operator, acting in accordance with good electricity industry practice.	
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 load information.	
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"/>
Partial check metering is not required in the PPAs (service level agreements) and is not provided with separate meters. Partial Check metering is provided through the SCADA and manual readings of meters occur monthly. In any case as the metering installations were commissioned before the Meter Code came into existence the requirement is deemed to satisfy (3.14(1)).	
Issues	
None	
Recommendations	
None	

Item 343 (326)				Compliance rating	
Licence condition 5.1				Compliant 5	
Licence: Distribution, Transmission					
Electricity Industry Metering Code clause 3.13(4)					
A check metering installation for a metering point must not exceed twice the error level permitted under clause 3.9 for the revenue metering installation for the metering point, and must be connected in such a way that it measures the same load conditions as the revenue metering installation for the metering point, and must be otherwise consistent with the prescribed requirements.					
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 load information.					
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"/>
Check metering installations are not required in the PPA and is not provided with separate meters. Partial Check metering is provided through the SCADA and manual readings of meters occur monthly. In any case as the metering installations were commissioned before the Meter Code came into existence the requirement is not applicable (3.14(1)).					
Issues					
None					
Recommendations					
None					

Item 344 (327)					Compliance rating				
Licence condition 5.1					Not Applicable				
Licence: Distribution, Transmission									
Electricity Industry Metering Code clause 3.14(3) If, under clause 3.14(2) of the Code, a metering installation uses metering class CTs and VTs that do not comply with the prescribed requirements, then the network operator must either (or both) install meters of a higher class accuracy or apply accuracy calibration factors within the meter in order to achieve the overall accuracy requirements 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 load information.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The metering installations were commissioned before the Meter Code came into existence. Clause 3.14(3) is only applicable for installations committed before Code commencement (3.14(1)) and not commissioned within a specified time frame.									
Issues									
None									
Recommendations									
None									

Item 351 (334)	Compliance rating
Licence condition 5.1	Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.20(1)</i> A network operator must, if reasonably requested by a Code participant, provide enhanced technology features in a metering installation.	

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"/>
Advanced technology features have not been requested.									
Issues									
None									
Management Actions									
Not applicable									

Item 352 (335)						Compliance rating Not Rated			
Licence condition 5.1									
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.20(3)</i> A network operator may only impose a charge for the provision of metering installations with enhanced technology features 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.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
Advanced technology features have not been requested.									
Issues									
None									
Recommendations									
None									

Item 353 (336)						Compliance rating Not Rated			
Licence condition 5.1									
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.21(1)</i> Meters containing an internal real time clock must maintain time accuracy as prescribed. Time drift must be measured over a period of 1 month.									
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"/>
Advanced technology features have not been requested.									
Issues									
None									
Recommendations									
None									

Item 354 (337) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.21(2)</i> If a metering installation includes measurement elements and an internal data logger at the same site, it must include facilities on site for storing the interval energy data for the periods 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 load information.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
Advanced technology features have not been requested.	
Issues	
None	
Recommendations	
None	

Item 355 (338) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.22</i> A network operator providing one or more metering installations with enhanced technology features must be licensed to use and access the metering software applicable to all devices being installed and be able to program the devices and set parameters.	
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"/>
Advanced technology features have not been requested.	
Issues	
None	
Recommendations	
None	

Item 356 (339) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 3.23(a)</i> Where signals are provided from the meter for the user or the user's customer use, a network operator must ensure that signals are isolated by relays or electronic buffers to prevent accidental or malicious damage to the meter.	
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"/>
Advanced technology features have not been requested. Customers do not receive meter signals.	

Issues
None
Recommendations
None

Item 357 (340) Licence condition 5.1					Compliance rating Not Rated				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.23(b)</i> Where signals are provided from the meter for the user or the user's customer use, a network operator must provide the user or the user's customer with sufficient details of the signal specification to enable compliance with clause 3.23(c) of the Code.									
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"/>
Advanced technology features have not been requested. Customers do not get meter signals.									
Issues									
None									
Recommendations									
None									

Item 358 (341) Licence condition 5.1					Compliance rating Not Rated				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.25</i> A network operator that operates and maintains a prepayment meter on its network must operate and maintain the pre-payment meter in accordance with good electricity industry practice and, as far as reasonably practicable, minimise any departure from what the requirements of the Code would have been in respect of the pre-payment meter if clause 3.24 were deleted.									
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"/>
There are no pre-payment meters.									
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 360 (343)						Compliance rating Not applicable			
Licence condition 5.1									
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 3.29</i> A network operator must publish a list of registered metering installation providers, including the prescribed details, and at least annually, update the list.									
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 load information.									
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"/>
Clause 3.28 provides that a network operator may register or deregister a person to undertake some or all of the activities relating to installation of metering. The Licensee has chosen not to register anyone. An installer for any new metering installation shall be considered at time required as installations are non standard. As registration is optional and there is no person registered, the requirement to publish and update a list is not applicable.									
Issues									
None									
Recommendations									
None									

Item 361 (344)						Compliance rating Compliant 5			
Licence condition 5.1									
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 4.1(1)</i> A network operator must establish, maintain and administer a metering database containing standing data and energy data for each metering point on its network.									
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 load information. Meter data base.									
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 maintains a database of the required information. Database and registry sighted.									
Issues									
None									

Recommendations
None

Item 362 (345) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.1(2)</i> A network operator must ensure that its metering database and associated links, circuits, information storage and processing systems are secured by means of devices or methods which, to the standard of good electricity industry practice, hinder unauthorized access and enable unauthorized access to be detected.	
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 databases and associated links, circuits, information storage and processing systems are secure by passwords with varying access levels.	
Issues	
None	
Recommendations	
None	

Item 363 (346) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.1(3)</i> A network operator must prepare, and if applicable, must implement a disaster recovery plan to ensure that it is able, within 2 business days after the day of any disaster, to rebuild the metering database and provide energy data to Code participants.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Asset Manager, 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 servers are backed up and recovery time has been tested. Recovery of energy data is within next meter reading as energy readings self correct at the next meter reading (half hour). The database registry is recovered within 1 hour and general recovery of servers within 1 day. The energy data is captured to two independent systems – one SCADA and one XL database. Either data set maybe used for provision of energy data. A disaster in one will not affect the data retained in the other, which will be immediately available and satisfying the requirement. Additionally, both data sets are backed up independently. Meter data is not required to be supplied to Code participants until after month end. The disaster recovery plan is covered by having independent dual data sets. Data is backed up off site in Perth.	
Issues	
None	
Recommendations	
None	

Item 364 (347) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.2(1)</i> A network operator must ensure that its registry complies with the Code and the prescribed clause of the market rules.	
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 network is not part of the WEM so the market rules are not applicable. The registry meets the requirements.	
Issues	
None	
Recommendations	
None	

Item 365 (348) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.3(1)</i> The standing data for a metering point must comprise at least the items specified.	
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, registry	
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 provided a complete print out of the registry information which contains the standing data required by the code.	
Issues	
None	
Recommendations	
None	

Item 366 (349) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission, 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) Licence condition 5.1					Compliance rating Compliant 5				
Licence: <i>Distribution, Transmission, 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: Generation, Retail									
Electricity Industry Metering Code clause 4.5(2)									
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, registry									
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. There is only one customer and therefore the registry is a single item. The customer is aware of their own details. 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 and the network operator are the same person.									

Issues
None
Recommendations
None

Item 369 (352) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.6(1)</i> If a network operator is notified of a change to or inaccuracy in an item of standing data by a Code participant which is the designated source for the item of standing data, then the network operator must update the registry.	
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 changes or inaccuracies have been advised from customers so there was no action consequent to advice. A code participant is defined as someone with an access contract and the Power Purchase Agreements are access contracts. The retailer and the network operator is the same person so no formal correspondence has taken place.	
Issues	
None	
Recommendations	
None	

Item 370 (353) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.6(2)</i> If a network operator is notified of a change to or inaccuracy in an item of standing data by a Code participant which is not the designated source for the item of standing data, or otherwise becomes aware of a change to or inaccuracy in an item of standing data, then the network operator must undertake investigations to the standard of good electricity industry practice to determine whether the registry should be updated, and update the registry as required.	
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 changes or inaccuracies have been advised.	
Issues	
None	
Recommendations	
None	

Item 371 (354) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.7</i> A network operator must notify any affected user for a metering point of the updated standing data within the timeframes prescribed, where that user would otherwise be entitled to the updated standing data.	
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 changes or inaccuracies have been advised by users that would require advice to users.	
Issues	
None	
Recommendations	
None	

Item 372 (355) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.8(3)</i> A network operator must allow a user who supplies, purchases or generates electricity to have local and (where a suitable communications link is installed) remote access to the energy data for metering points at its associated connection points, using a 'read only' password provided by the network operator.	
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"/>
The customer has local access (the meters are on their sites). No requests for remote access have been received.	
Issues	
None	
Recommendations	
None	

Item 373 (356) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 4.8(4)</i> A network operator must have security devices and methods in place that ensure that energy data held in its metering installation and data held in its metering database is secured from unauthorized local or remote access, in the manner prescribed, sufficient to the standard of good electricity industry practice.	

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"/>
The metering installations and data are on controlled access mine sites. Password access is required for access to the database so it is secured from unauthorized local or remote access, in the manner prescribed, sufficient to the standard of good electricity industry practice.									
Issues									
None									
Recommendations									
None									

Item 374 (357) Licence condition 5.1					Compliance rating Compliant 5				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 4.8(5)</i> A network operator must ensure that electronic passwords and other electronic security controls are secured from unauthorized access and are only issued to authorized personnel.									
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"/>
The metering information is secured by Licensee's IT requirements and is secured by passwords with varying access levels. Passwords are only issued to authorised personnel.									
Issues									
None									
Recommendations									
None									

Item 375 (358) Licence condition 5.1						Compliance rating Compliant 5			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 4.9</i> A network operator must retain energy data in its metering database for each metering point on its network for at least the periods, and with the level of accessibility, 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"/>
Data is retained by IT systems with back up of servers and retained for the required time. Metered energy data from 2008/9 has been sighted and is available immediately on the computer network to the appropriate personnel.									
Issues									
None									

Recommendations
None

Item 376 (359) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.1(1)</i> A network operator must use all reasonable endeavours to accommodate another Code participant's requirement to obtain a metering service and requirements in connection with the negotiation of a service level 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, 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 for a metering service were made in the audit period.	
Issues	
None	
Recommendations	
None	

Item 377 (360) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.1(2)</i> A network operator must expeditiously and diligently process all requests for a service level agreement and negotiate its terms in good faith. A network operator must, to the extent reasonably practicable in accordance with good electricity industry practice, permit a Code participant to acquire a metering service containing only those elements of the metering service which the Code participant wishes to acquire.	
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 for a metering service level agreement or a metering service were made in the audit period.	
Issues	
None	
Recommendations	
None	

Item 378 (361) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.3</i>	

A network operator must, for each metering point on its network, obtain energy data from the metering installation and transfer the energy data into its metering database 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"/>
Data is downloaded every half hour which is less than the 2 day requirement.									
Issues									
None									
Recommendations									
None									

Item 379 (362) Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.4(1)</i> A network operator must, for each accumulation meter on its network, use reasonable endeavours to undertake a meter reading that provides an actual value at least once in any 12 month period.									
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 are no accumulation meters.									
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. The retailer and the network operator is the same person so there is no practical distinction between where the need arises.									

Issues
None
Recommendations
None

Item 381 (364) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.5(2)</i> A network operator may only impose a charge for the provision of data under this Code in accordance with the applicable service level agreement between it and the user and must not impose a charge for the provision of data if another enactment prohibits it from doing so.	
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"/>
The users were only charged in accordance with the power purchase agreements which are the <i>applicable service level agreements</i> . There were no charges for metering. No complaints were received.	
Issues	
None	
Recommendations	
None	

Item 382 (365) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Generation, Retail</i>	
<i>Electricity Industry Metering Code clause 5.5(3)</i> A user must not impose any charge for the provision of the data under this Code unless it is permitted to do so under another enactment.	
Observations	
Documents	<input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed 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 were not charged for data.	
Issues	
None	
Recommendations	
None	

Item 383 (366) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.6(1)</i>	

A network operator must provide validated, and where necessary, substituted or estimated energy data for a metering point to the user for the metering point and the IMO 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, PPAs									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The data is provided according to the <i>applicable service level agreements</i> (the PPAs) The network is not part of the WEM and the requirement is not applicable as daily settlements with the IMO are not required.									
Issues									
None									
Recommendations									
None									

Item 384 (367) Licence condition 5.1						Compliance rating Not Applicable			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.7</i> A network operator must provide replacement energy data to the user for the metering point and the IMO 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, PPAs.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
The network is not part of the WEM and the requirement is not applicable as daily settlements with the IMO are not required. The data is replaced in accordance with the timeframes in the relevant service level agreement (the Power Procurement Agreements). The policy is to use straight line estimations for the replacement value.									
Issues									
None									
Recommendations									
None									

Item 389 (372) Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.12(1)</i> If a network operator is given a request in accordance with the communication rules and the energy data request relates only to a time or times for which the user was the current user at the metering point, a network operator must provide a user with a complete set of energy data for a metering point 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 have been no requests and no transfers to require energy data. The users have been provided energy data according to the PPAs (applicable service level agreements).									
Issues									
None									
Recommendations									
None									

Item 390 (373) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.13</i> A network operator must provide a current user with a complete current set of standing data for a metering point and advise whether there is a communications link for the metering point, within the timeframes prescribed, if it is given a request in accordance with the communication rules.	
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 have been no requests (There are no communication rules as there is no need for them with no other retailer on network).	
Issues	
None	
Recommendations	
None	

Item 391 (374) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.14(3)</i> A network operator must acknowledge receipt of a bulk standing data request from a user and provide the requested standing data within the timeframes prescribed in accordance with the communication rules.	
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 have been no requests.	
Issues	
None	
Recommendations	
None	

Item 392 (375) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.15</i> A network operator that provides energy data to a user or the IMO must also provide the date of the meter reading.	
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, invoices, 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"/>
Dates are included with meter readings on invoices or supporting data.	
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. The retailer and network operator are the same organisation so passing of information is automatic.	
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 400 (383) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.19(5)</i> A network operator must give notice to a user, or (if there is a different current user) the current user, acknowledging receipt of any customer, site or address attributes from the user 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 was no new customer site or address attributes in the audit period to require a notice.	
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. There was no provision of standing data by the network operator to the user.									
Issues									
None									
Recommendations									
None									

Item 405 (388) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(2)</i> A network operator must comply with any reasonable request by a Code participant to undertake either a test or an audit of the accuracy of the metering installation or the energy or standing data of the metering installation.	
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 requests in the audit period.	
Issues	
None	
Recommendations	
None	

Item 406 (389) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(4)</i> A test or audit is to be conducted in accordance with the metrology procedure and the applicable service level agreement.	
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"/>
The tests have been carried out in accordance with the power purchase agreements which are the <i>applicable service level agreements</i> .	
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. The network is not on the WEM.	
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 409 (392) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(8)</i> A network operator may only impose a charge for the testing of the metering installations, or auditing of information from the meters associated with the metering installations, or both, in accordance with the applicable service level agreement between it and the user.	
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"/>
There were no charges for meter testing.									
Issues									
None									
Recommendations									
None									

Item 410 (393) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(9)</i> Any written service level agreement in respect of the testing of the metering installations, or the auditing of information from the meters associated with the metering installations, must include a provision that no charge is to be imposed if the test or audit reveals a non-compliance with this Code which results in energy data errors in the network operator's favour.	
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"/>
The power purchase agreements allow for meter testing but the practice is not to charge, no matter which way the error is favouring.	
Issues	
None.	
Recommendations	
None	

Item 411 (394) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(11)</i> A network operator must advise the affected parties as soon as practicable of errors detected under a test or audit, the possible duration of the errors, and must restore the accuracy of the metering installation in accordance with the applicable service level agreement.	
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 Licensee is not obliged to upgrade the metering installations (3.14(1)). But the customers should be consulted to see if the accuracy of some meters should be improved as the tests indicated that some meters did not meet Code requirements. The Customer was advised of the tests. The customer installed the meters originally.	
Issues	
Some meters do not meet the Meter Code accuracy requirements and while the Licensee is not obliged to upgrade the meter installations (3.14(1)), the customers should be consulted to see if they wish to upgrade the meters. Given that it is unlikely that the CTs would be upgraded to metering class CTs, the cost benefit for changing the meters for mainly smaller loads may not be	

positive.
Recommendations
Upgrade the meters to code requirements if the customers approve. (non Mandatory recommendation – 11.9)

Item 412 (395) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.21(12)</i> The original stored error correction data in a meter must not be altered except during accuracy testing and calibration of a metering installation.	
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"/>
Error correction data was not altered or destroyed during calibration or tests. Stored data in a meter is not used (data obtained from SCADA).	
Issues	
None	
Recommendations	
None	

Item 413 (396) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.22(1)</i> A network operator must validate energy data in accordance with this Code applying, as a minimum, the prescribed rules and procedures and must, where necessary, substitute and estimate energy data under this Code applying, as a minimum, the prescribed rules and procedures.	
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"/>
Validation was not required (installed before Code and CT ratios not changed, check metering is not required). Estimated energy is substituted using Substitution Method 13 or interpolated data which will self correct the following month. Peak power is not charged.	
Issues	
None	
Recommendations	
None	

Item 414 (397) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.22(2)</i> The network operator must use check metering data, where available, to validate energy data provided that the check metering data has been appropriately adjusted for differences in metering installation accuracy.	
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"/>
Check metering not installed or required by PPA but meters are manually read monthly and correlated with the database values. Partial check metering provided on SCADA.	
Issues	
None	
Recommendations	
None	

Item 415 (398) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.22(3)</i> A network operator must prepare substitute values using the prescribed method if a check meter is not available or energy data cannot be recovered from the metering installation within the time required.	
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"/>
Full check metering not installed or required. Estimated energy is substituted using Substitution Method 13 or interpolated data which will self correct the following day (or even if last day in next month). Metering readings are correlated monthly by manual reads.	
Issues	
None	
Recommendations	
None	

Item 416 (399) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.22(4)</i> A network operator that detects a loss of energy data or incorrect energy data from a metering installation must notify each affected Code participant of the loss or error within 24 hours after detection.	

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 have been no errors in the energy data and therefore no obligation to notify. There have been communication breaks between the energy data base and the billing data base. These errors self correct when the communication is re-established and this is within 24 hours. When a loss of energy (billing) data is detected (due to communication breaks), self correcting estimate reading is employed for large loads (Method 13). Any loss of energy data or incorrect energy data is handled according to the PPAs.									
Issues									
None									
Recommendations									
None									

Item 417 (400) Licence condition 5.1					Compliance rating Compliant 5				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.22(5)</i> Substitution or estimation of energy data is to be required when energy data is missing, unavailable or corrupted, including in the circumstances described.									
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"/>
When energy data is missing, unavailable or corrupted, the substituted or estimated data has is substituted using Substitution Method 13 or interpolated data which will self correct the following month. The only occasions when data is missing has been a communications break from the SCADA to the energy database and not issues in the metering installation.									
Issues									
None									
Recommendations									
None									

Item 418 (401) Licence condition 5.1					Compliance rating Compliant 5				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.22(6)</i> A network operator must review all validation failures before undertaking any substitution.									
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"/>
There has been no failure of the energy data validation. Data that has been missing, unavailable or corrupted and data has had to be substituted has been due to a communications break from									

the SCADA to the energy database and not issues in the metering installation and not issues in validation. There has been an issue with Western Power in Kambalda but that is not an issue for this licensee.
Issues
None
Recommendations
None

Item 419 (402) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.23(1)</i> A network operator that determines that there is no possibility of determining an actual value for a metering point must designate an estimated or substituted value for the metering point to be a deemed actual value for the metering point.	
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, energy data.	
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"/>
In all cases the actual value was available as the error was in communication and not in the metering installation but it was not necessary to go back to the meter as the reading self corrects next actual reading. (The actual readings are correlated by monthly manual reads). The designated, substituted or estimated energy deemed value is determined using Substitution Method 13 or interpolated data which will self correct the following day / month.	
Issues	
None	
Recommendations	
None	

Item 420 (403) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.23(3)</i> A network operator that has designated a deemed actual value for a metering point must repair or replace the meter or one or more of components of metering equipment (as appropriate) at the metering point.	
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"/>
There has been no error requiring a metering point to be repaired or replaced. The issues were in the communication between systems and not in the meters.	
Issues	
None	
Recommendations	
None	

Item 421 (404) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.24(1)</i> A network operator that uses an actual value (first value) for energy data for a metering point, and a better quality actual or deemed actual value is available (second value), must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	
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"/>
It would not be necessary to revise the reading with the second value (accumulator register) as the error will self correct the following next update (day/month). Meter accumulation registers are not used (other than for manual reads) but SCADA accumulates the data.	
Issues	
None	
Recommendations	
None	

Item 422 (405) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.24(2)</i> A network operator that uses a deemed actual value (first value) for energy data for a metering point, and a better quality deemed actual value is available (second value), must replace the first value with the second value if doing so would be consistent with good electricity industry practice.	
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"/>
It would not be necessary to revise the reading with the second value (accumulator register) as the error will self correct the following update (day/month). Meter accumulation registers are not used (other than for manual reads) but SCADA accumulates the data.	
Issues	
None	
Recommendations	
None	

Item 423 (406) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.24(3)</i> A network operator that uses an estimated or substituted value (first value) for energy data for a metering point, and a better quality actual, deemed, estimated or substituted value is available	

(second value), must replace the first value with the second value if doing so would be consistent with good electricity industry practice or the user and its customer jointly request it to do so.									
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"/>
It would not be necessary to revise the reading with the second value (accumulator register) as the error will self correct the following daily update (or even at end of month).									
Issues									
None									
Recommendations									
None									

Item 424 (407) Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.24(4)</i> A network operator (acting in accordance with good electricity industry practice) must consider any reasonable request from a Code participant for an estimated or substituted value to be replaced.									
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 for an estimated or substituted value to be replaced. There is no disadvantage to the customer that would require this due to self correction of next reading.									
Issues									
None									
Recommendations									
None									

Item 425 (408) Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.25</i> A network operator must ensure the accuracy of estimated energy data in accordance with the methods in its metrology procedure and ensure that any transformation or processing of data preserves its accuracy in accordance with the metrology procedure.									
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 error in the energy data base but some disturbances in transmission to the billing data base which self corrects when communication is re-established. The accuracy is not material where the estimates will self correct the following daily update or monthly bill if at end of									

period if any energy data issues should arise.
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. The retailer and the network operator is the same person.	
Issues	
None	
Recommendations	
None	

Item 427 (410) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.29</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, then, except to the extent that the metering data agency agreement provides otherwise, the parties must undertake the activities 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: 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 election for Western Power to be the metering agent.	
Issues	
None	
Recommendations	
None	

Item 428 (411) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.30(1)</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, then the electing network operator and the electricity networks	

corporation must enter into a metering data agency agreement in relation to the network, which must deal with at least the matters 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: 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 election for Western Power to be the metering agent.									
Issues									
None									
Recommendations									
None									

Item 429 (412) Licence condition 5.1						Compliance rating Not Applicable			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.31(1)</i> If a network operator makes an election for the electricity networks corporation to be its metering data agent in relation to a network, the electricity networks corporation must assess the compliance of each metering installation in the network with this Code and notify the electing network operator of each non-compliant metering installation.									
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: 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 election for Western Power to be the metering agent.									
Issues									
None									
Recommendations									
None									

Item 430 (413) Licence condition 5.1						Compliance rating Not Applicable			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 5.31(2)</i> An electing network operator may, by notice to the electricity networks corporation, require the electricity networks corporation to upgrade a non-compliant metering installation, in which case the electricity networks corporation must undertake the upgrade in accordance with the metering data agency agreement and good electricity industry practice.									
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: 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 election for Western Power to be the metering agent.									
Issues									
None									

Recommendations
None

Item 431 (414) Licence condition 5.1	Compliance rating Not Applicable
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 5.34(2)</i> Except to the extent that the metering data agency agreement provides otherwise, the costs which may be recovered by the electricity networks corporation for acting as the network operator's metering data agent must not exceed the amounts 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: 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 election for Western Power to be the metering agent.	
Issues	
None	
Recommendations	
None	

Item 432 (415) Licence condition 5.1	Compliance rating Not Compliant 2
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry Metering Code clause 6.1(1)</i> A network operator must, in relation to its network, comply with the agreements, rules, procedures, criteria and processes 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"/>
The procedures are laid out in the power purchase agreements. There is no evidence of departures from the agreements There have been no complaints. There is no separate metrology procedure.	
Issues	
The metrology requirements are defined in the PPAs which have been in place since 1996 and therefore predate Code and are satisfied. If the opportunity arises such as a new contract the Licensee should develop for approval a metrology procedure document.	
Recommendations	
If the opportunity arises such as a new contract the Licensee should develop for approval a metrology procedure document.	

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 user not complying with the agreements.									
Issues									
None									
Recommendations									
None									

Item 435 (418) Licence condition 5.1					Compliance rating Compliant 5				
Licence: <i>Distribution, Transmission, 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. The retailer and the network operator is the same person.									
Issues									
None									
Recommendations									
None									

Item 436 (419) Licence condition 5.1					Compliance rating Compliant 5				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry Metering Code clause 7.2(2)</i> A network operator must notify each Code participant of its initial contact details and of any change to its contact details at least 3 business days before the change takes effect.									
Observations									
Documents	<input checked="" type="checkbox"/>	Compliance	<input checked="" type="checkbox"/>						
Evidence: interviewed Commercial Manager, Manager North & South, Assistant Managers North and South. Documents: correspondence file									
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 was a change of address in the audit period and customers were advised more than the required 3 days before the change.									
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. The retailer and the network operator is the same person and notification is superfluous. Network operator has made no requests.	
Issues	
None	
Recommendations	
None	

Item 438 (421) Licence condition 5.1	Compliance rating Compliant 5
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 checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
Evidence: interviewed Asset Manager, Documents: Not applicable	
Process	<input checked="" type="checkbox"/> Outcome <input checked="" type="checkbox"/> Output <input checked="" type="checkbox"/> Reporting <input checked="" type="checkbox"/> Compliance <input checked="" type="checkbox"/>
The 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 on the Licensee's network. The Retailer notified Western Power as its network operator in regard to the Boulder connection of the Licensee's change of address and this advice has been confirmed by Western Power.	
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>Distribution, Transmission, 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>Distribution, Transmission, 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>Distribution, Transmission, 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>Distribution, Transmission, 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>Distribution, Transmission, 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	

2.15.4 ELECTRICITY INDUSTRY (NETWORK QUALITY AND RELIABILITY OF SUPPLY) CODE – LICENCE CONDITIONS AND OBLIGATIONS (ALL LICENCE CONDITION LICENCE CLAUSE 5.1)

Item 446 (429) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 5(1)</i> A distributor or transmitter must, as far as reasonably practicable, ensure that electricity supply to a customer's electrical installations complies with prescribed standards.	
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: Incident/outage logs 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"/>
The PPAs are an agreement to vary the supply quality requirements in accordance with the Code. The parties freely entered into this contract and had an understanding of the advantages and disadvantages of the conditions to which they were agreeing. Supply quality and interruptions are monitored by SCADA. Standards were agreed with customers in power purchase agreements and these specify the relevant standards of the day (AS2279). The old Australian Standard uses a different method for voltage flicker and less detail for harmonics. Direct comparison was not possible. The old Australian Standard has a more demanding total harmonic level than the Code.	

Issues
None.
Recommendations
None.

Item 447 (430) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 8</i> A distributor or transmitter must, so far as reasonably practicable, disconnect the supply of electricity to installations or property in specified circumstances, unless it is in the interest of the customer to maintain the supply.	
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: Incident logs.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no disconnections for network quality and reliability of supply issues during the audit period. Disconnection of the customer would, if quality of supply became an issue, be carried out in the most reasonably practical manner unless it is in the interest of the customer to maintain supply. The customer on site representative would be contacted where possible.	
Issues	
None	
Recommendations	
None	

Item 448 (431) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 9</i> A distributor or transmitter must, as far as reasonably practicable, ensure that the supply of electricity is maintained and the occurrence and duration of interruptions is kept to a minimum.	
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: Incident logs, SCADA 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"/>
Interruptions are logged. There is a requirement for mine production and therefore supply to keep interruptions to a minimum and penalties apply for not meeting the required availability.	
Issues	
None	
Recommendations	
None	

Item 449 (432) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(1)</i> A distributor or transmitter must, so far as reasonably practicable, reduce the effect of any interruption on a 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: Incident logs.	
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"/>
Planned outages are coordinated with mine production/shutdowns. Unplanned outages were restored as soon as reasonably practicable and as expected for a radial system.	
Issues	
None	
Recommendations	
None	

Item 450 (433) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 10(2)</i> A distributor or transmitter must consider whether, in specified circumstances, it should supply electricity by alternative means to a customer who will be affected by a proposed interruption.	
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: Incident logs. The power purchase agreements cover supply reliability.	
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 network is essentially radial or N-0 and there is no backup for line failures. There have been no requests for standby or alternative supply due to shutdown. These circumstances are very unlikely as planned outages are coordinated with mine shutdowns.	
Issues	
None	
Recommendations	
None	

Item 452 (435) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(2)</i> A distributor or transmitter must, so far as reasonably practicable, ensure that customers in specified areas do not have average total lengths of interruptions of supply greater than specified durations.	
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: Incident logs.	

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 PPAs are an agreement to vary the supply quality requirements in accordance with the Code. The parties freely entered into this contract and had an understanding of the advantages and disadvantages of the conditions to which they were agreeing. Supply quality and interruptions are monitored by SCADA. The interruptions which potentially could attract penalties are monitored in accordance with the agreement. The average interruption was 63 minutes which is less than the prescribed 290 minutes.									
Issues									
None									
Recommendations									
None									

Item453 (436) Licence condition 5.1						Compliance rating Compliant 5			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 13(3)</i> The average total length of interruptions of supply is to be calculated using the specified method.									
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: Incident logs.									
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 PPAs are an agreement to vary the supply quality requirements in accordance with the Code. The interruptions which potentially could attract penalties are monitored in accordance with the agreement. The average interruption was 63 minutes (4 year average of annual averages in accordance with Code) which is less than the prescribed 290 minutes. Licensee has collecting outage statistics but indices such as SAIDI and SAIFI are hard to have statistical meaning with so few customers.									
Issues									
None									
Recommendations									
None									

Item 454 (437) Licence condition 5.1						Compliance rating Not Rated			
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 14(8)</i> A distributor or transmitter must, on request, provide to an affected customer a free copy of an instrument issued by the Minister and of any notice given under section 14(7) of the Electricity Industry (Network Quality and Reliability of Supply) Code 2005.									
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: Incident logs.									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No requests have been made.									
Issues									
None									
Recommendations									
None									

Item 455 (438) Licence condition 5.1	Compliance rating Not Rated
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 15(2)</i> A distributor or transmitter that agrees with a customer to exclude or modify certain provisions must set out the advantages and disadvantages to the customer of doing so in their 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: Incident logs.	
Process	<input type="checkbox"/> Outcome <input type="checkbox"/> Output <input type="checkbox"/> Reporting <input type="checkbox"/> Compliance <input type="checkbox"/>
There have been no new agreements in the audit period. But, the PPAs are an agreement to vary the supply quality requirements in accordance with the Code. The parties freely entered into this contract and had an understanding of the advantages and disadvantages of the conditions to which they were agreeing.	
Issues	
None	
Recommendations	
None	

Item 461 (444) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(1)</i> A distributor or transmitter must take all such steps as are reasonably necessary to monitor the operation of its network to ensure compliance with specified requirements.	
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: Incident logs, SCADA 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 systems are monitored by SCADA.	
Issues	
None	
Recommendations	
None	

Item 462 (445) Licence condition 5.1	Compliance rating Compliant 5
Licence: <i>Distribution, Transmission</i>	
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 23(2)</i> A distributor or transmitter must keep records of information regarding its compliance with specific requirements for the period specified.	
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: Incident logs.									
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 time requirement only applies to reports under s27 which in turn are not required as there are no small use consumers. Power quality is continuously monitored and incident logs are being maintained for 23(1)(a) as varied by the agreement between the parties.									
Issues									
None									
Recommendations									
None									

Item 463 (446) Licence condition 5.1							Compliance rating Not Rated							
Licence: <i>Distribution, Transmission</i>														
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(3)</i> A distributor or transmitter must complete a quality investigation requested by a customer in accordance with specified requirements.														
Observations														
Documents		<input 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 Incident logs														
Process		<input type="checkbox"/>	Outcome		<input type="checkbox"/>	Output		<input type="checkbox"/>	Reporting		<input type="checkbox"/>	Compliance		<input type="checkbox"/>
No requests have been made.														
Issues														
None														
Recommendations														
None														

Item 464 (447) Licence condition 5.1					Compliance rating Not Rated				
Licence: <i>Distribution, Transmission</i>									
<i>Electricity Industry (Network Quality and Reliability of Supply) Code 2005 clause 24(4)</i> A distributor or transmitter must report the results of an investigation to the customer concerned.									
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: Incident logs									
Process	<input type="checkbox"/>	Outcome	<input type="checkbox"/>	Output	<input type="checkbox"/>	Reporting	<input type="checkbox"/>	Compliance	<input type="checkbox"/>
No requests/reports have been made.									
Issues									
None									
Recommendations									
None									